Environmental and Social Review Summary
Concept Stage

(ESRS Concept Stage)

World Bank Performance Standards (OP 4.03)

March 4, 2020
## I. BASIC INFORMATION

### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
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<tbody>
<tr>
<td>Africa</td>
<td>Africa</td>
<td>P171967</td>
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#### Project Name
Regional Infrastructure Finance Facility (RIFF) Project

#### Practice Area (Lead) Financing Instrument
Finance, Competitiveness and Innovation Investment Project Financing

<table>
<thead>
<tr>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
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<tbody>
<tr>
<td>5/4/2020</td>
<td>6/18/2020</td>
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#### Borrower(s) Implementing Agency(ies)

<table>
<thead>
<tr>
<th>Borrower(s)</th>
<th>Implementing Agency(ies)</th>
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<tbody>
<tr>
<td>Trade and Development Bank (TDB), Common Market for Eastern and Southern Africa (COMESA) Secretariat</td>
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#### Proposed Development Objective(s)

The Project Development Objective is to support the expansion of long-term finance to infrastructure and social sectors in Eastern and Southern Africa.

#### Financing (in USD Million)

<table>
<thead>
<tr>
<th>Financing (in USD Million)</th>
<th>Amount</th>
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</thead>
<tbody>
<tr>
<td>Borrowing Country's Fin. Intermediary/ies</td>
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<tr>
<td>Montreal Protocol Investment Fund</td>
<td>0.00</td>
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Total Project Cost: 425.00

### B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

NO
C. Summary Description of Proposed Project [including Project structure, components, activities, technical design, flow of funds, etc.]

The Regional Infrastructure Finance Facility (RIFF) Project aims to promote economic transformation and regional integration in Eastern and Southern Africa by extending long-term development capital to catalyze private sector investment into infrastructure and social sectors using an approach that maximizes finance for development (MFD). The Project is anticipated to be structured as an Investment Project Financing with Disbursement Linked Indicators (DLIs). It has three components and two implementing agencies i.e.: (i) Trade and Development Bank (TDB) for a financial intermediary financing operation with component 1 (Infrastructure Finance Facility) and component 2 (credit enhancement instruments) aimed at scaling up TDB’s long-term project and infrastructure finance activities; and, (ii) the Common Market for Eastern and Southern Africa (COMESA) Secretariat for Component 3, a technical assistance and capacity building window for enabling environment initiatives and project preparation support.

The RIFF Project is well aligned with WB's regional strategy for Africa which contemplates focusing on fewer and bigger operations within the core pillars of creating sustainable and inclusive growth, jobs and economic transformation, strengthening human capital, and building resilience.

Component 1: Infrastructure Finance Facility (IFF ~US$325 million)

Africa’s growing and vibrant private sector can be a major driver of the regional integration across the continent. This first component will seek to mobilize private investment by making available long-term finance to the infrastructure and social sectors. Infrastructure sectors here include: Energy, Logistics, Water and Sanitation, ICT/digital, and social sectors include health, education and housing. There will be a dedicated energy window within this component, focusing on projects with explicit development impact or as pilots to push for PPP agenda.

Component 2: Credit-Enhancement for Increased Private Sector Participation (~US$75 million)

In Africa in particular, investment in infrastructure and the social sector faces elevated risks due to political and regulatory uncertainty, embedded risks in government concessions, exchange rate risk, as well as underdeveloped and unpredictable policy frameworks. As a result, in many cases, private sector investment cannot be realized without credit enhancement instruments. The team will explore two forms of credit enhancement: partial credit guarantee fund and tier 2 capital equivalent to TDB.

Component 3: Technical Assistance (~US$25 million)

This component will undertake a number of complementary TA activities managed by the COMESA Secretariat i.e.: a) Support enabling environments in Member States to Promote Private Sector Participation b) Project preparation and investment promotion c) Capacity Building at TDB, Secretariat and member state levels.

D. Scope of application of Performance Standards (PSs) [and Environmental and Social Standards (ESSs), if relevant]

The project will apply the World Bank’s Performance Standards (PSs) to component 1, which aims to mobilize private investment by making available long-term finance to the infrastructure and social sectors, and to component 2 which will facilitate credit-enhancement to enable increased private sector participation. Components 1 and 2 will be implemented by TDB. The PSs are considered more suitable for TDB since its Environmental and Social Management System (ESMS) is based on the IFC Performance Standards, and all its private sector clients – who are the focus of this
project - are familiar with and are using them.\textsuperscript{1} TDB reviews its ESMS every year, which provides opportunity for the project to contribute to the strengthening of the ESMS. On the other hand, the project will apply the Environmental and Social Standards (ESSs) to component 3 which will undertake a number of complementary TA activities in support of the TDB operations and will be implemented by the COMESA Secretariat. COMESA is a public regional institution currently owned by 21 member states, hence the application of the ESSs to the component it will be implementing.

E. Environmental and Social Overview

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

The Regional Infrastructure Finance Facility (RIFF) Project is a regional collaborative initiative between the World Bank, the Trade and Development Bank (TDB) and the Common Market for Eastern and Southern Africa (COMESA) Secretariat. TDB is a regional African Development Finance Institution which aims to support regional economic integration by fostering development. Since TDB is the main implementing agency, E&S assessment and risk management design for the project focuses on analyzing salient characteristics and parameters appropriate for Financial Intermediary (FI) lending operations where locations of the investments for which World Bank proceeds will be used would most likely not be known before implementation.

Specifically, as part of its environmental and social (E&S) assessment and due diligence for Financial Intermediary (FI) projects, the World Bank assesses the following key aspects: (1) the nature and risk profile of the FI's current portfolio prior to World Bank's investment with a focus on infrastructure portfolio in case of the RIFF project; (2) the scope and nature of the proposed World Bank's support; (3) the quality and comprehensiveness of the key components of the FI's Environmental and Social Management System (ESMS), where the FI already has one in place, including any existing E&S policies and procedures, organizational capacity and competency, and current monitoring and reporting arrangements; (4) FI's own labor and working conditions and the current policies and organizational structure for managing these aspects; and (5) FI's current approaches for engaging with stakeholders as part of its E&S policies, procedures, and organizational capacity assessment.

1. Initial review of the current TDB's portfolio E&S risk profile

Established in 1985, the Eastern and Southern African Trade and Development Bank (TDB) is a multilateral, treaty-based development financial institution, with assets of USD 6 billion. TDB approaches its interventions in a manner that pro-actively supports sustainable development, including the reduction of climate risks and expansion of clean energy – in line with the Paris Agreement and SDG commitments linked to environmental protection. To date, 70% of TDB's energy portfolio is in renewables and half of its overall portfolio directly and indirectly contributes to SDGs (source: https://www.unenvironment.org/news-and-stories/press-release/trade-and-development-bank-unepcollaborate-climate-finance). TDB's proactive position in integrating sustainability in its operations is

\textsuperscript{1} TDB is considered a Private Entity per para 3 of OP4.03 Performance Standards for Private Sector Activities, which states that “\textit{a private entity is any natural or legal person, whether privately or publicly owned: (a) which is carrying out or is established for a business purpose, and is operating on a commercial basis; (b) which is financially and managerially autonomous; and (c) whose day-to-day management is not controlled by the government.}” TDB is majority-owned by governments but operates on a commercial basis according to its Charter; it regularly issues bonds in the capital markets and has investment grade rating by Moody’s. Governments are not involved in the day-to-day management. The Project activities are considered Private Sector Activities per para 4 since TDB will be responsible for identifying, assessing and managing the environmental and social risks, and has an ESMS to identify, assess and manage these risks associated with the subprojects it finances.
demonstrated not only by the development of an Environmental and Social Management System (ESMS) on the Environmental, Social and Governance (ESG) risk side, but also by actively pursuing the formulation of Climate Finance Framework, Sustainability Reporting Framework, and SDG Bonds Framework. To this end, on November 5, 2019, TDB signed an MoU with UN Environment Program to collaborate on climate change mitigation and adaptation actions.

**Sectoral exposure:** Initial review of TDB's portfolio of project finance shows main focus on relatively high-risk sectors such as agriculture, trade, industry, infrastructure, energy and tourism. Its loan book is dominated by petrochemicals and agribusiness, with gross exposure of 36% and 23% in 2017, respectively. TDB conducts two major types of lending activities: (1) trade finance loans generally with maturities of less than a year to a maximum of 36 months; and (2) project and infrastructure finance loans with maturities from three to 10 and a maximum of 15 years. Both suggest moderate E&S risk exposure in terms of tenor, though it should be noted that World Bank’s involvement aims to enable TDB to lend with longer tenors. However, in terms of investment size and borrowing entity profile, TDB extends lending to public sector (governments and state-owned enterprises, representing 63% of its portfolio as of December 31, 2018), large as well as small and medium corporations, and other financial institutions. The nature of TDB’s operations means that it lends larger amounts to a smaller number of entities. This leads to high portfolio concentration, which can potentially increase the magnitude of E&S risks and impacts.

Energy is currently TDB’s top financed sector and includes hydro, geothermal, wind, and oil and gas, with oil and gas as the top exposure sector due to trade facilities for countries to purchase oil and gas. During appraisal the team will ascertain the most efficient measures to ring-fence WB’s financing from supporting upstream oil and gas investments (even if indirectly), in line with corporate commitments.

2. **Scope and Nature of the Proposed World Bank Support and its Environmental and Social Implications**

The purpose of the RIFF facility is to incentivize TDB to extend long-term finance mainly to the private sector in infrastructure and social sectors. Geographically, RIFF is expected to be implemented in TDB’s IDA member countries, i.e. countries that are part of COMESA. While there are 22 countries that are members of COMESA, it is highly unlikely that the project will have investments in all of them as the project’s focus will be primarily on countries where there is the highest probability and enabling environment to attract private capital and the limited project funding can be leveraged to engage with investors. The following activities considered for the World Bank support to TDB under RIFF are expected to be associated with environmental and social risks and impacts:

A) **The infrastructure Finance Facility (Component 1)**

A-1. **Infrastructure Project Finance.** This component plans to fund several infrastructure and social sectors projects and hence presents direct exposure to E&S risks and impacts of the clearly defined investments that would be supported from World Bank loan proceeds using Project Finance lending instrument. Investments are expected to mobilize private capital, support resilience building, jobs, and trade and investment across borders by making credit available for beneficiary entities. Beneficiary entities are expected to be mostly private sector, however there is a possibility of financing public entities as well (e.g. a public portion of a PPP if it can be expected to leverage significant private capital). The project does not, however, envision funding to be on-lent to other FIs or FI-type entities and all infrastructure investments under this component will be made directly by TDB.

Overall, infrastructure Project Finance normally requires a lot of attention to E&S risks management including potential issues around land acquisition, resettlement, labor and working conditions, pollution, biodiversity impacts, engaging with disadvantaged and marginalized groups, GBV/SEA cases and stakeholder engagement and
grievance management, among others. Since the specific risks and impacts cannot be known before project implementation when the specific investments will be selected for financing, it can be anticipated that a wide range of E&S risks may arise within the “long list” of investments that TDB would submit for World Bank’s consideration. Although the project design does not envision formal restrictions on funding certain infrastructure sectors, RIFF may consider support for investments in the renewable and clean energy, water and sanitation, ICT/digital, and social sectors that would include health, education and housing. Given the relatively modest size of the credit line, World Bank will work with TDB to diversify the pipeline to achieve maximum positive impact. This may potentially mean financing a diversified set of smaller projects.

Other E&S risk factors include the fact that under Component 1, the RIFF project seeks to support TDB to expand to new markets and territories including FCV countries (for instance Burundi, Eritrea,) and other underserved regions and sub-regions as a way of reducing concentration risk related to its loan portfolio which is currently geographically concentrated in Kenya (16 percent), Zambia (14 percent) and Sudan (13 percent) of total gross loans as of end-June 2019. Also, the proposed project seeks to support TDB to invest in infrastructure assets maintenance, which could potentially entail E&S legacy risks.

It should be noted that the World Bank may select several “pilot” investments under this component for which precise locations would be known during project preparation, and which would then be financed by the RIFF. In those cases E&S risk identification and management instruments would have to be prepared and disclosed before World Bank Board, with the regular advance disclosure of drafts. In this regard, the RIFF project team will undertake further engagements with TDB to identify projects that are well advanced, and which the Bank would like to finance so that the E&S risk assessment and management instruments can be prepared in time for Board and in compliance with relevant requirements of the World Bank’s OP 4.03.

A-2. Dedicated energy window. This window envisions the provision of trade finance to off-grid companies and mini-grid developers, which will likely constitute MSME Finance lending extended directly by TDB without additional financial intermediation using wholesale-retail financing model (i.e. extending financing through other FIs), unlike many other World Bank projects in this sector and thus would be experimental. Generally, MSME finance in the off-grid sector can be expected to carry limited E&S risks. These small size investments are mostly associated with small-scale land acquisition issues (including issues associated with voluntary land donation), labor and working conditions, occupational health and safety, potential for GBV risks, and limited environmental risks such as added stress on community water resources. In MSME finance, E&S risk assessment approaches and mitigation instruments are substantially different from Project Finance that is the lending instrument for the “main” Component 1 and will require a tailored approach (described below).

However, this window also envisions support to regional integration subprojects such as PPPs for regional grid integration (e.g. interconnectors) or regionally significant generation PPPs that serve multinational development needs. These investments can potentially involve substantial resettlement, adverse impact on disadvantaged and marginalized groups, labor, GBV issues and other higher risk situations which is typical of such projects in the region. Hence, the nature and magnitude of E&S risks and impacts would be comparable to those under overall Component 1 (Project Finance).

B) Credit-Enhancement for Increased Private Sector Participation (Component 2). Credit enhancement instruments may be required to de-risk the project finance investments themselves, or to strengthen the balance sheet of TDB to mobilize greater amounts of private capital to support its infrastructure business line. The options currently
considered are (a) partial credit guarantee fund set up by TDB and (b) tier 2 capital equivalent to TDB. The scope and nature of physical E&S risks and impacts under this instrument would be largely similar to those under Component 1, however the nature of World Bank’s exposure to these risks would be different. The first instrument would carry direct exposure to E&S risks of the investments for which guarantees may be provided and the second instrument carries mostly reputational E&S risk exposure to TDB with a quasi-equity instrument where World Bank support will enable TDB to strengthen its ability to raise capital in the form of bonds from capital markets to fund its infrastructure business line. For Component 2, the approach to E&S risks and impacts mitigation measures will be assessed during project preparation based on the selected option.

C) Technical Assistance to COMESA (Component 3). The TA activities will focus on creating enabling environment to attract private capital. These activities include project preparation support to transformational projects with regional impact at scale i.e. feasibility studies to prepare the identified projects to bankability and investment promotion activities. As part of this process, it is possible that the preparation of E&S studies and risk mitigation instruments will be supported under the project, and those will need to comply with the relevant provisions of the World Bank ESSs, and the guidance laid out in the May 2019 Guidance Note on Technical Assistance and the ESF, in addition to receiving necessary approvals as required by each country's regulatory framework. COMESA's capacity to carry out these activities effectively will be further assessed during project preparation.

E. 2. Client’s Organizational Capacity/Borrower’s Institutional Capacity

The project will be implemented by two entities: (1) Trade and Development Bank (TDB) will implement Components 1 and 2, and, (2) COMESA Secretariat will implement Component 3.

E.2.1: E&S capacity of Trade and Development Bank

Investments made by TDB using proceeds of the WB loan will require adequate E&S risk assessments to be undertaken, mitigation measures developed, and adequate monitoring carried out. E&S assessment and risk management design for the subprojects will focus on analyzing salient characteristics and parameters appropriate for TDB’s lending operations, and entities that implement subprojects will have to apply the risk mitigation hierarchy of: avoid, reduce, mitigate, and compensate for residual impacts, with close oversight from TDB.

Current E&S capacity of TDB: TDB developed its first Environmental Policy in June 2005 supported by the Netherlands Development Finance Company FMO, which indicated a relatively long-standing commitment to sustainability at the early era of sustainable finance (for comparison, the Equator Principles originated in 2004 when global banks like Citi commenced doing the same). In 2010, TDB undertook an exercise to harmonize all its policies and procedures and the harmonized ESM policy was formally approved by the Board of Directors in September 2010. These policies provided the basis for which the environmental and social risk assessment was carried out by TDB. In 2015, the policies and procedures underwent a comprehensive review with Technical Assistance (TA) support from the African Development Bank (AfDB). Hence, TDB’s E&S policies and procedures currently in place reference international lenders’ standards, including IFC Performance Standards. Other financiers that are relying on the current TDB’s ESMS in their financing support to TDB are AFD and EIB.

Overall, TDB has structures and systems in place that can support RIFF implementing. The current TDB’s E&S capacity comprises:
**ESMS and E&S Policy:** TDB has an ESMS with a well-formulated E&S Policy and clearly articulated institutional commitments to integrating E&S sustainability across all its operations, complete with an exclusion list. The policy is based on the IFC (and other DFIs) performance standards and covers most of the elements of the World Bank’s Performance Standards for Private Sector Activities. TDB’s subjects its E&S risk policy to an annual review performed by external consultants to ensure it continues to be in line with international best practice. Under the World Bank financed RIFF project, there is room – through the annual ESMS reviews - to further improve TDB’s ESMS and scale up its institutional capacity and skills mix to undertake detailed due diligence during the WB project appraisal and implementation, for which an Environmental and Social Action Plan (ESAP) is in the process of being prepared collaboratively with TDB.

**Protocols and procedures to carry out E&S risk management functions:** TDB ESMS includes clear process flow and procedures that are linked to credit and investment cycles, which conforms to the international best practice. Those include a comprehensive decision tree/ matrix with clearly assigned responsibilities and accountabilities for each step, supported by formal guidance and tools to help the responsible persons fulfil their roles in the process consistently. TDB’s E&S procedures also include adequate management programs. From the initial review of ESMS, TDB seems to have clear steps for E&S screening of transactions which includes initial assessment of a transaction against the exclusion list and categorization. This is followed by an in-depth ESDD, which is undertaken internally by the TDB E&S staff for moderate and low risk projects or by external experts for high risk and some substantial risk projects. E&S clauses are included in the legal loan covenants.

**Subproject screening and review:** TDB has a system in place for the screening and review of subprojects submitted to it for financing, which includes due diligence by its own specialists for low to moderate subprojects and external consultants for high category subproject. Subprojects are subjected to E&S review at various stages starting with the ESMS Specialist working closely with specialists (including legal) at the New Deal Forum before submitting it to the ESMS Coordinator who reviews it in consultation with the operational and technical committee before submitting it to the ESMS Manager who reviews it in consultation with the corporate credit committee. From here the proposal is submitted to the Compliance and Credit Management Department from where it is processed up to the Board level as necessary. The E&S team members sit on various credit committees to ensure E&S is taken into account at transaction onboarding and that risks are appropriately categorized and weighted (also best practice).

**E&S Staffing:** TDB’s E&S unit is mapped to the fully-fledged Compliance and Risk Management Department (CRMD) which was created in 2012 to enhance TDB’s E&S risk assessment and to ensure the E&S risk assessment is fully integrated into the bank-wide Enterprise Management System (ERM). The unit is composed of an ESMS Specialist, ESMS Coordinator and ESMS Manager. In addition, TDB’s E&S policy emphasizes the requirement of engaging external E&S experts during due diligence and monitoring phases of category 1 subprojects to ensure expert advice is obtained at all stages of the project in respect to E&S issues. To ensure E&S risks get due attention throughout the organization, over 150 staff members in various departments have been trained on E&S to enable them become aware and look out for potential E&S risks in subproject proposals submitted to TDB for financing. Also, there are at least two (2) E&S champions in the organization who help to sensitize other staff on the importance of E&S risk assessment in proposals.

**Areas in which TDB E&S capacity requires strengthening:** The above structural capacity notwithstanding, due to a potential increase in the number of subprojects that will require E&S monitoring and supervision, and the potential increase in the number of clients who may need to be supported in their E&S risk management responsibilities as a result of RIFF implementation, it is recommended that TDB enhances its operational E&S expert capacity (in terms of in-house capacity to ensure adequate monitoring and supervision). Also, there are areas in which the TDB ESMS will
require to be strengthened. These mainly relate to the number of operational E&S staff, stakeholder engagement and information disclosure, and community health and safety, specifically in relation to labor influx, gender-based violence, (GBV) and sexual exploitation and abuse (SEA). The areas of improvement and their timeframes are indicated in the ESAP.

E2.2: COMESA Secretariat’s Environmental and Social Risk Management Capacity

ESSs will apply to the COMESA Secretariat’s Component 3 (TA support) which will include funding for preparation of E&S for TDB financing. However, the Secretariat as currently constituted has limited E&S capacity as there is no E&S department/unit or staff in its structure. The Secretariat’s experience with E&S implementation has been project based and has been guided by the requirements of the financing institution. In the few examples where the Secretariat undertook feasibility/ESIA studies for regional subprojects on behalf of member countries, the financing agency helped to establish a Project Implementation Unit (PIU) to be responsible for all activities under the project including preparation of E&S ToRs and procurement of E&S expert consultants. The PIU staff were contracted for the life of the project and was disbanded at the end of the project, leaving no institutional memory at the Secretariat.

Under RIFF, the technical assistance (TA) managed by COMESA would be used to build the E&S capacity of the Secretariat, with ongoing capacity support, to enable it to deliver on the TA aspects of the project for which it will be responsible.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Categorization

B. Environmental and Social Risk Classification

The environmental risk is rated high at concept stage (before mitigation). The project plans to support TDB’s pipeline of infrastructure investments and also enable TDB to lend with a longer tenor. Many investments are expected to support regional integration by making credit available for final beneficiaries. Investments are expected to demonstrate positive regional economic impact, which may include a consideration for achieving positive E&S outcomes and, among other aspects, climate-related benefits in terms of both mitigation and adaptation given TDB’s institutional priorities and current initiatives in this area (described above). In terms of inherent sectoral risks, which is one of the determining factors for the risk level along with loan sizes, tenors, and types of financial instruments, initial review of the current TDB portfolio of infrastructure projects shows significant exposure to relatively high-risk sectors such as agribusiness/ agriculture, transport, energy. Since the exact investments will not be known until implementation, it can be assumed that any of the thematic risks covered by WB PSs and ESSs can arise.

The social risk rating for this project is rated as high at the concept stage (before mitigation). The project will finance sub-projects through an FI in multiple sectors and in up to 22 countries in Africa (though as mentioned previously, projects are likely to be located in countries which have an enabling environment to attract private finance into infrastructure). The focus is expected to be on medium to large scale infrastructure projects that are likely to result in significant involuntary resettlement impacts, complex labor management issues, and may be in areas where Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are present, areas
with a high prevalence of Gender Based Violence and Sexual Exploitation (GBV/SEA) which can be exacerbated by the project, areas affected by conflict or violence, or areas hosting refugees. TDB has an ESMS in place that recognizes the above social risks, but its capacity to monitor and supervise sub-projects over a large geographical area, as well as the capacity of their potential borrowers is not yet fully known.

World Bank and TDB would agree on a list of restricted activities defining what kinds of subprojects that may not be financed by TDB using the Bank loan, with either temporary or permanent exclusion of certain activities from financing (as described under options 1 and 2 below).

Two options are being considered to limit the level of environmental and social risk exposure to the supported TDB portfolio:

**Option 1:** A phased calibrated approach, which consists of providing funding for sub-projects with only limited E&S risks and impacts in a first phase. If TDB successfully manages the E&S risks for the first phase, higher risk projects would be allowed in a second phase. Restrictions would be conditioned on specific TDB actions to strengthen its ESMS and capacity. These actions would be agreed with the client and specified in the ESAP.

**Option 2:** Investments that involve relatively higher risk situations/ circumstances - in line with how those are formulated in the WB’s OP4.03 / Performance Standards – would be permanently restricted and integrated into the overall World Bank’s eligibility criteria for funding that will guide WB’s portfolio construction. Examples of such restrictions can include not providing financing to investments with negative impacts on critical habitats; or to subprojects involving large-scale resettlement (clear definition is yet to be agreed upon); or to sub-projects involving substantial migrant labor/ labor influx (to be defined); or those sub-projects which would require free prior and informed consent (FPIC) to be met per PS 7. It should be noted that restrictions expressed in terms of specific sectors or project categories should be avoided due to subjectivity of this approach based on latest international good practice (with the exception of sectors that are part of high level official corporate commitments, such as coal).

### III. APPLICABLE ES STANDARDS

#### A. Performance Standards (PSs) that Apply to the Activities Being Considered

**PS1 Assessment and Management of Environmental and Social Risks and Impacts**

Overview of application of PS1: A brief description of the potential environmental and social risks and impacts relevant to the Project.

The RIFF project would adopt the following steps in the process of avoiding, mitigating, and offsetting/ compensating for E&S risks and impacts:

1. **Institutional Exclusion List.** Exclusion list is the first basic step in calibrating portfolio construction strategy from E&S perspective. Since the majority of DFIs have used this basic negative screening approach for about past 20 years, with proven effectiveness, TDB’s ESMS already incorporates an exclusion list which is a combination of negative screens of the DFIs that have financed TDB so far (as part of a common approach to strengthening TDB’s ESMS among them as various points in time).
2. **List of Restricted Activities.** Two options are being considered to mitigate the level of environmental and social risk exposure in the sub-projects. Both options would be based on a list of restricted activities which would be agreed between TDB and the World Bank and applied specifically to RIFF financing. The list can be used in two ways (1) One option is the phased calibrated approach whereby only projects with limited E&S risks and impact are being funded in a first phase, and those on the restricted list would not be supported. Once TDB becomes increases its E&S risk management capacity to a level deemed acceptable by the Bank, those activities could be considered for inclusion under RIFF financing; (2) the other option is to apply the restriction list permanently and sub-projects which present one of the restricted activities would not be eligible for financing under RIFF. The preparation work will clarify the preferred option with the client.

3. **Process of E&S Risks and Impacts Identification.** The TDB procedure and process for screening, review and approval of E&S assessment instruments, E&S due diligence, and E&S monitoring and reporting during implementation as written in its ESMS seems adequate to support the implementation of RIFF (but the Bank team is awaiting practical examples to confirm TDB’s application of its ESMS). Robust Environmental and Social Impact Assessments (ESIAs), as well as additional studies that will inform preparation of thematic risks and impacts management plans would be required (e.g. Biodiversity Management Plans, Labor Management Plan, GBV and SEA Management Plan etc.) for investments supported by the World Bank. Since the exact investment subprojects and their locations will not be known until RIFF enters implementation phase, it can be assumed that any of the thematic risks covered by the WB PSs can arise and be covered in the identification and assessment of E&S risks and impacts process. Therefore, the World Bank will require TDB to take all the requisite measures to ensure that the subprojects receiving Bank financing will comply with applicable country legislations of the countries where TDB makes the investments and the WB’s related environmental and social standards. All investments - which would constitute project or corporate finance for which WB’s PSs are most readily applicable - are expected to comply with the relevant provisions of the World Bank PSs. More specifically, PS1 (including stakeholder engagement and consultations in all aspects of the project) and PS2, will be applicable to TDB while ESS1, ESS2 and ESS10 will be applicable to COMESA. In addition, any of the eight (8) PSs could be relevant to investments made by TDB depending on the outcomes of the identification and assessment of E&S risks and impacts process through PS1. Similarly, any of the 10 ESSs could be relevant to COMESA, especially in their preparation of feasibility/ESIA study TORs and in guiding their review and clearance of TA documents.

**Specific Initial Considerations for Each Project Component**

(1) In the case of the LoC and credit enhancement support extended to TDB by the World Bank, all investments - which would constitute Project Finance for which WB’s PSs are most readily applicable - are expected to comply with the relevant provisions of the 8 World Bank PSs in addition to stakeholder engagement and information disclosure.

(2) In case of the dedicated energy window, which will likely constitute SME finance extended directly by TDB without additional financial intermediation using wholesale-retail financing model (i.e. extending financing through other FIs), E&S risks and impacts assessment may need to be done using other tools that derive their scope and nature from the PSs. Examples of such tools may be exclusion criteria specific to the energy sector, E&S screening and risk mitigation questionnaires, corrective action plans suitable for application by SMEs based on their size, loan tenors, and capabilities. Such tools and capacity to implement them effectively must be included in TDB’s ESMS.

(3) As part of its support to COMESA for technical assistance activities, should the preparation of E&S studies and risk
mitigation instruments be supported under the project, those will need to comply with the relevant provisions of the World Bank ESSs, in addition to receiving necessary approvals as required by each country’s regulatory framework.

**Engagement and Information Disclosure**

Stakeholder engagement will be required for all concerned parties including those affected by subprojects and other parties that may be involved in service delivery. For example, in a project involving land acquisition, the project affected persons, relevant civil society organizations (CSOs) and government entities that are involved in land issues would be included among the stakeholders to be engaged. Since not all subprojects may be known until implementation, the degree and specific approaches for stakeholder engagement requirements will be determined based on each subproject’s nature and circumstances. To this end, TDB has a stakeholder engagement plan as part of its ESMS. TDB’s current E&S Policy of January 2019 requires the beneficiaries to have proactive engagement with stakeholders and information disclosure at the community/beneficiary level. This has made specific provisions that require the beneficiaries to establish a mechanism to receive and facilitate the resolution of affected people’s concerns and grievances and recommends tools for the same. However, the stakeholder engagement and information disclosure aspects of the TDB ESMs will need to be improved to align it to the Bank’s public disclosure requirements by integration it into TDB’s E&S management procedures. For example, for RIFF, a Stakeholder Engagement Plan (SEP) would have to be prepared and publicly disclosed by TDB prior to Appraisal.

Specifically, the Bank’s SEP requirements call for the following (i) the expected types of key stakeholders; (ii) requirements for the FI subproject implementors to engage with the stakeholders, especially with potentially affected Indigenous Peoples’ (IP) representatives and other vulnerable groups, as applicable to each FI subproject; (iii) the requirement for the FI to develop a SEP scaled to the project risks and impacts of the project, and tailored to the characteristics and interests of the Affected Communities; (vi) requirements for frequency of engagement throughout the project cycle; (v) procedures for feedback solicitation, recording and monitoring; (vi) the need to define the responsible party for stakeholder engagement; (vii) timeline for the engagement; (vii) budget and human resources needed to implement the SEP/SEF by the FI, and to implement subsequent SEPs by the FI subprojects.

For each subproject to be financed by RIFF, TDB will require its borrowers to conduct stakeholder engagement in a manner that is proportionate to the potential risks and impacts of the subproject. Depending on the type of subproject and extent of its E&S risks and impacts, the Bank may require TDB to be engaged in stakeholder engagement. In addition, TDB will be required to put in place procedures for external communications on E&S matters proportionate to the risks and impacts of the subprojects, and the risk profile of TDB portfolio to enable TDB respond to stakeholder enquiries and concerns in a timely manner.

On information disclosure, TDB will disclose through the its website, and permit, the Bank, in writing, to disclose on the Bank’s website, a summary of each of the elements of TDB’s ESMS. Likewise, TDB will require its sub-borrowers to disclose, in relation to subprojects financed by the Project, any project-related documents required; (a) by the application of the PSs; (b) for any subprojects categorized as high risk in accordance with TDB’s own categorization system; and (c) any environmental and social monitoring reports relating to (a) or (b).
PS 2 Labor and Working Conditions

Overview of the relevance of PS2:

The current TDB E&S Policy of January 2019 identifies labor and working conditions as a cross cutting risk across its portfolio. TDB shall not directly finance any project, infrastructure or trade finance activity involving Production or activities involving harmful or exploitative forms of forced labor/harmful child labor and prostitution and/or Pornography as per the current exclusion list in ESMS document. TDB is currently monitoring the compliance of sub-projects in line with IFC’s Performance Standard 2 as follows:

- All projects have an HR policy
- TDB is working to reinforce processes within the borrowers for No Child and Forced Labor, No Discrimination,
- Equal Opportunities and Grievance Mechanisms
- Positive Approach on Labor conditions – PPE/C compliance,
- All projects developed emergency response capabilities and TDB is reinforcing the establishment of drill programs, including surrounding communities
- TDB is reinforcing that EHS measures being applied in the borrowers site are adopted in the supply chain

Not all sub projects will be known until implementation, however given that the project will support relatively large-scale infrastructure, labor force - including contracted workers and primary supply workers are likely to be realized. Issues such as labor influx, security of workers, codes of conduct for interaction with local communities, hygiene at construction camps. For these and other related risks, detailed employment and labor management procedures, including procedures for the management of sexual harassment in the work place and the prevention of child and forced labor, will need to be put in place by TDB clients (borrowers). The borrowers will be expected to share their codes of conduct, and other labor management plans with TDB. These will be required to be part of the financing agreements.

In addition, PS2 will apply to TDB itself. TDB is expected to have in place and maintain appropriate labor management procedures, including procedures relating to working conditions and terms of employment, nondiscrimination and equal opportunity, grievance mechanisms and occupational health and safety. The Bank will review the existing TDB labor policies and labor management procedures. At the end of 2018, TDB had 139 employees and 44% were female. TDB has a formal process to assess performance and conducted a staff survey in 2018. TDB has a formal code of conduct in place, enforced through the Human Resources and Administration Department and Compliance. Annual compulsory trainings for all staff are conducted. TDB also has a formal whistleblowing mechanism in place.

PS 3 Resource Efficiency and Pollution Prevention and Management

Overview of the relevance of PS3:

The exact projects will not be known until implementation, however given that the project will support relatively large scale infrastructure, a wide range of pollution and resource efficiency issues is expected to arise in the supported projects.

In general, PS3 is relevant for the project due to financing of rehabilitation or construction of new infrastructure, as subprojects may pose risk of environmental pollution and degradation of natural resources (soil, water, ecosystem services) and can result in impacts if not well identified and mitigated. Such subprojects could include construction of
new infrastructure, such as roads and water treatment facilities, use of technologies, equipment, among others. These activities may generate environmental problems by an inadequate: (i) use of inputs, including chemicals; (ii) consumption of water resources and consequent degradation of water quality and quantity (affecting users downstream); and (iii) use of gas and oil for equipment; among others.

The ESMS will consider the expected types of FI subproject-level risks and impacts and establish the applicable general requirements for mitigation measures as appropriate, considering country context and legislation as well as capacities at different levels of stakeholders and contributing agencies. The ESMS will also include specific measures for FI subproject implementation entities regarding the prevention or mitigation of pollution or degradation of natural resources (mainly soil and water) when handling hydrocarbons (oil and gas) for equipment in construction activities. The use of water, energy and raw materials should be assessed considering the mitigation hierarchy and efficient use and management of all types of material, including waste.

**PS 4 Community, Health, Safety, and Security**

Overview of the relevance of PS4:

All the sub projects will not be known until implementation, however given that the project will support relatively large scale infrastructure, a broad range of community health and safety issues is expected to be involved. E&S risks that are typical of infrastructure project in the TDB’s geographic areas are expected. These include influx of labor (immigration) and the related issues of gender-based violence (GBV), sexual exploitation and abuse (SEA), child labor and exploitation. This contributes to the project to be categorized as high risk and thus could be potentially restricted. For instance, under the list of restricted activities, an exclusion could be considered for subprojects having direct adverse impact on ecosystem services that may result in adverse health and safety risks to affected communities.

TDB is expected to have procedures in its ESMS for the management of these social risks, and to require its borrowers to have plans for the prevention and management of such risks. This requirement will be part of the financing agreements and will be submitted to TDB by the borrower prior to start of construction work. The ESMS document makes references to the potential Occupational Health and Safety risks and labor influx, and has made provision for integration into its ESMS and project financing procedures.

**PS 5 Land Acquisition and Involuntary Resettlement**

Overview of the relevance of PS5:

Given the project’s focus on providing financing to medium to large scale infrastructure, sub-projects are expected to require land acquisition, restrictions on land use and/or involuntary resettlement that may involve physical and/or economic displacement with potential adverse impacts on people’s livelihoods. The scope and complexity of these resettlement impacts as well as the context in which they occur and the capacity of the sub-borrower who will be responsible for managing the land acquisition and resettlement process will greatly affect the social risk assessment of the proposed sub-projects. Subprojects with potentially large-scale involuntary resettlement impacts (to be defined) would require prior clearance from the Bank to be eligible for RIFF financing. TDB’s practical experience with application of its policies to resettlement (whether small or large) is yet to be assessed to ensure that they are materially consistent with the standard. Where gaps exist, the Bank and TDB will agree on actions in the ESAP to strengthen the TDB resettlement policies, procedures and capacity.
PS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Overview of the relevance of PS6:

The exact projects will not be known until implementation, however given that the project will support relatively large scale infrastructure, biodiversity issues are expected to arise in many, albeit not all, supported projects. In general, PS6 standard is relevant for the project. Some FI subprojects might (i) be located in modified or natural habitats; or (ii) potentially affect or be dependent on ecosystem services. To limit the level of environmental risk exposure in the sub-projects, the list of restricted activities would likely exclude subprojects having adverse impact on critical habitats and/or legally protected and internationally recognized areas of high biodiversity value and subprojects where a biodiversity offset is proposed as the mitigation measure.

The ESMS will provide a process for FI subproject implementing entities to identify relevant risks and impacts in line with PS1 and PS6, consider direct and indirect subproject-related impacts on biodiversity and ecosystem services, and identify any significant residual impacts. The process will consider relevant threats to biodiversity and ecosystem services, especially focusing on habitat loss, degradation and fragmentation, invasive alien species, overexploitation, hydrological changes, nutrient loading, and pollution. It will also consider the differing values attached to biodiversity and ecosystem services by Affected Communities and other stakeholders as appropriate. Where natural habitats might be impacted, the relevant PS6 alignments will be applied, including consideration of subproject-related impacts across the potentially affected landscape or seascape.

PS 7 Indigenous Peoples

Overview of the relevance of PS7:

Indigenous Peoples as defined by the PS7 may be present in many of the countries in which TBD is expected to finance sub-projects under RIFF. TDB has a policy on Indigenous Peoples. However, their practical experience on the application of this policy is yet to be affirmed (evidence of such experience has been requested from TDB). TDB is committed to prohibit financing any subproject, infrastructure or trade activity that would impinge on the lands owned, or claimed under adjudication, by Indigenous Peoples, without full documented consent of such people as per the current exclusion list in the ESMS policy document. List of restricted activities would likely exclude subprojects involving Indigenous Peoples for which free, prior and informed consent is required under PS7.

PS 8 Cultural Heritage

Overview of the relevance of PS8:

TDB-financed subprojects may have direct, indirect, and possibly cumulative risks or impacts on cultural heritage. TDB’s ESMS prohibits financing of any subproject, infrastructure or trade finance activity impacting upon World heritage sites and other protected areas. TDB has experience with projects that have impacted cultural aspects of some of the affected communities, e.g. on matters of handling graves. Any gaps in TDB’s own ESMS will be supplemented by requirements of PS8.
B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of ESS1:

ESS1 is the “umbrella ESS” on whose findings and recommendations the application of all the other ESSs depend. This ESS will therefore apply to component 3 of the project which will be implemented by the COMESA Secretariat. The requirement of this ESS will be especially applicable to the Secretariat in the performance of the Feasibility/ESIA study activities. The preparation of TORs, and any E&S studies and risk mitigation instruments to be supported under the project will need to comply with the relevant provisions of the World Bank ESSs, and the guidance laid out in the May 2019 Guidance Note on Technical Assistance and the ESF, in addition to receiving necessary approvals as required by each country’s regulatory framework. (However, as already noted, the Secretariat’s current E&S capacity is limited and will have to be built under the project to enable the Secretariat successfully implement the activities foreseen under this component, including the development of ToRs and implementation of Feasibility/ESIA studies for some of the projects to be implemented by TDB).

Areas where reliance on the Borrower’s E&S Framework may be considered:

Will not be considered.

ESS10 Stakeholder Engagement and Information Disclosure

Overview of the relevance of ESS10:

Stakeholder Engagement and Information Disclosure are subsets of all the other ESSs and is therefore applicable to the COMESA Secretariat Activities. This ESS will apply to the Secretariat activities, especially in the performance of the Feasibility/ESIA study activities. The requirements of the standard will be included in the ToRs for such studies and the resultant document/instrument will be reviewed by the Secretariat against this standard.

ESS2 Labor and Working Conditions

Overview of the relevance of ESS2:

This ESS will apply to the COMESA Secretariat activities, especially in the performance of the Feasibility/ESIA study activities. The requirements of the standard will be included in the ToRs for such studies and the resultant document/instrument will be reviewed by the Secretariat against this standard. In addition, Occupational Health and Safety standards will be adhered to by the COMESA Secretariat.

Overview of the relevance of ESS3: Resource Efficiency and Pollution Prevention and Management
Given that the project will support relatively large-scale infrastructure, a wide range of pollution and resource efficiency issues is expected to arise in the supported projects. This ESS will apply to the COMESA Secretariat Activities, especially in the performance of the Feasibility/ESIA study activities for the rehabilitation or construction of new infrastructure. The requirements of the standard will be included in the ToRs for such studies and the resultant document/instrument will be reviewed by the Secretariat against this standard.

ESS4 Community Health and Safety
Overview of the relevance of ESS4:

Subprojects to be financed by TDB may result in health and safety impacts for the affected communities, including GBV, HIV/STD and SEA related impacts which would need to be identified during the feasibility/ESIA studies. For these reasons, this ESS will apply to the COMESA Secretariat activities, especially in the performance of the Feasibility/ESIA study activities. The requirements of the standard will be included in the ToRs for such studies and the resultant document/instrument will be reviewed by the Secretariat against this standard.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
Overview of the relevance of ESS5:

Subprojects to be financed by TDB are likely to require land to be acquired for their implementation. The acquisition of such land may result in involuntary resettlement and related impacts such as physical and/or economic displacement and adverse impacts on people’s livelihoods. The need for land-take and related impacts would need to be identified during feasibility/ESIA studies and the necessary mitigation measures recommended. For these reasons, this ESS will apply to the COMESA Secretariat Activities, especially in the performance of the Feasibility/ESIA study activities. The requirements of the standard will be included in the ToRs for such studies and the resultant document/instrument will be reviewed by the Secretariat against this standard.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
Overview of the relevance of ESS6:

Subprojects to be financed under RIFF for which the COMESA Secretariat may be called upon to undertake TA activities may be located in biodiversity sensitive areas. Therefore, this ESS will apply to the COMESA Secretariat Activities, especially in the performance of the Feasibility/ESIA study activities. The Secretariat will include the requirements of the standard in the ToRs for such studies and the resultant document/instrument will be reviewed by the Secretariat against this standard.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
Overview of the relevance of ESS7:

Subprojects to be financed under RIFF for which the COMESA Secretariat may be called upon to undertake TA activities may be located in areas in which Indigenous Peoples may be present or to which IPs may have collective attachment. Therefore, this ESS will apply to the COMESA Secretariat Activities, especially in the performance of the
Feasibility/ESIA study activities. The Secretariat will include the requirements of the standard in the ToRs for such studies and the resultant document/instrument will be reviewed by the Secretariat against this standard.

ESS8 Cultural Heritage
Overview of the relevance of ESS8:

Subprojects to be financed under RIFF for which the COMESA Secretariat may be called upon to undertake TA activities may be located in areas world cultural heritage areas, or in areas that are of cultural importance to the affected communities including IPs, or in areas in which culturally important chance-finds may be found during project implementation. Therefore, this ESS will apply to the COMESA Secretariat Activities, especially in the performance of the Feasibility/ESIA study activities and to give guidance on how to handle matters of cultural heritage during implementation. The Secretariat will include the requirements of the standard in the ToRs for feasibility/ESIA studies and the resultant document/instrument will be reviewed by the Secretariat against this standard.

ESS9 Financial Intermediaries
Overview of the relevance of ESS9:

The requirements of this standard will not apply to the COMESA Secretariat component of the project since the secretariat is a public entity that supports the 21 COMESA member states in their cross-border trade facilitation activities.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways
To Be Determined

Explanation:
This being a regional project, subprojects to be financed under RIFF for which the COMESA Secretariat may be called upon to undertake TA activities may be located in areas involving International waterways. Therefore, this ESS will apply to the COMESA Secretariat Activities, especially in the performance of the Feasibility/ESIA study activities. The Secretariat will include the requirements of the standard in the ToRs for such studies and the resultant document/instrument will be reviewed by the Secretariat against this standard.

OP 7.60 Projects in Disputed Areas
to be Determined

Explanation:
This being a regional project, subprojects to be financed under RIFF for which the COMESA Secretariat may be called upon to undertake TA activities may be located in areas with border or other cross-border disputes. Therefore, this ESS will apply to the COMESA Secretariat Activities, especially in the performance of the Feasibility/ESIA study activities. The Secretariat will include the requirements of the standard in the ToRs for such studies and the resultant document/instrument will be reviewed by the Secretariat against this standard.
IV. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Other Relevant Project Risks

B. Is a common approach being considered?  

List possible Financing Partners

Yes

Current E&S policies and procedures have been developed with support from multiple development finance institutions, FMO, AfDB, AFD, and most recently, EIB. World Bank’s review of TDB's ESMS will build on the work done by these partners. EIB’s line of credit was signed in December 2019 and includes SME and climate action components. EIB has prepared detailed eligibility criteria, among which are also detailed E&S requirements for each eligible sub-sector. These requirements include negative E&S screens (e.g. no subprojects involving resettlement in some cases, or significant negative impacts on areas with high biodiversity value and nature conservation areas would not be eligible). World Bank will explore, among other things, the possibility of harmonizing the ESMS procedures with EIB’s approach to achieve overall consistency in TDB’s infrastructure portfolio construction under a common set of criteria with equalized E&S risk characteristics.

Additionally, UNEP Finance Initiative has signed a memorandum of understanding with TDB on November 5, 2019, to collaborate around a number of areas critical to the global environmental agenda and help TDB green its portfolio and make it more climate-friendly (https://www.unenvironment.org/news-andstories/press-release/tradeanddevelopment-bank-unep-collaborate-climate-finance). World Bank shall seek opportunities for the RIFF project to collaborate and benefit from this larger engagement and any tools that may be developed as a result of this work.

C. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Project Appraisal:

Agreement on final approach and List of Restricted Activities
Preparation of the ESAP for TDB for components 1 and 2
Preparation of the ESCP for COMESA Secretariat for technical assistance under component 3 (feasibility studies)

D. Possible issues to be addressed in the:

Client Environmental and Social Action Plan (ESAP):

<table>
<thead>
<tr>
<th>Action</th>
<th>Timeframe</th>
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<tbody>
<tr>
<td>TDB completes a review of its E&amp;S policy to strengthen its measures and requirements for:</td>
<td>Before effectiveness</td>
</tr>
<tr>
<td>i. Stakeholder engagement and information disclosure</td>
<td></td>
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<tr>
<td>ii. Management of risks related to GBV, SEA and sexual harassment (SH)</td>
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<tr>
<td>iii. Labor and Working Conditions</td>
<td></td>
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</tbody>
</table>
TDB improves the public disclosure of its grievance procedures and grievance receipt interface | Before effectiveness
---|---
TDB puts in place third-party monitoring for all investments financed from WB credit line | Before effectiveness
TDB to enhance its human resource capacity for E&S work with clients due to a potentially increased number of subprojects requiring direct supervision and support to its clients (e.g. one E&S specialist can effectively monitor and supervise at most 15 subprojects, including offering the necessary support to clients). | Within first year of project implementation
Access the services of GBV experts to sensitize TDB E&S staff on GBV and SEA risk management strategies and to support TDB to include GBV/SEA risk management strategies in its ESMS policy and procedures | Before effectiveness
TDB develops a tool for calculating climate mitigation and adaptation benefits of its subprojects | Within first year of project implementation
TDB conducts internal training on its new additional HR policies (2019) and code of ethics | Within first year of project implementation
TDB conducts internal training on its new additional HR policies (2019) and code of ethics | Within first year of project implementation

Borrower Environmental and Social Commitment Plan (ESCP):
An ESCP will be prepared for COMESA Secretariat.

**E. Timing**

Tentative target date for preparing the Appraisal Stage ESRS | 23 March 2020

**V. WORLD BANK E&S OVERSIGHT**

Corporate advice/oversight will be provided by an Environmental and Social Standards Adviser (ESSA) during project preparation | Yes

**VI. CONTACT POINTS**
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VIII. APPROVAL

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