Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 04/20/2020 | Report No: ESRSA00423
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Tanzania</td>
<td>AFRICA</td>
<td>P164906</td>
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Project Name: Land Tenure Improvement Project

Practice Area (Lead) | Financing Instrument | Estimated Appraisal Date | Estimated Board Date
Urban, Resilience and Land | Investment Project Financing | 4/20/2020 | 7/8/2020

Implementing Agency(ies)

Borrower(s)

Ministry of Finance and Planning
Ministry of Lands, Housing and Human Settlements Development

Proposed Development Objective(s)
To strengthen the national land administration system and increase tenure security in selected areas for both men and women.

Financing (in USD Million)

<table>
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<th>Total Project Cost</th>
<th>Amount</th>
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<td>150.00</td>
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B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?
No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]
While Tanzania has a strong legal framework for land rights, it has one of the lowest records of land registration (<10%) in Africa. The current land registration process is not systematic but sporadic, which is expensive and does not provide a complete database for planning, taxation and other key uses. While community norms may provide a perceived tenure security, as pressure on land resources increases, documentation of land rights may help property holders to be more secure and more likely to invest in improvements to the property, as well as reducing potential for land conflicts. The lack of property ownership/use data also negatively affects tax revenue and effective planning for
growth and development. Therefore the proposed Project will to demarcate and register (with certificates issued) approximately 2.5 million parcels over the project period. Both urban and rural areas will be covered and both men and women will benefit. The Ministry of Land, Housing and Human Settlement Development (MLHHSD) will be responsible for implementing the Project with support from local level authorities, CSOs and the private sector. In rural areas, MLHHSD can move more quickly to mass issuance of certificates based on several pilots already completed. In urban areas, issuance of certificates will be piloted in year one before full rollout during the subsequent four years. These activities along with the rollout of the Integrated Land Management Information System (ILMIS) will support the decentralization of efficient land administration services to all regions. The Project will also support capacity building, public awareness, base-mapping and strengthening the geodetic network and other activities to support a modern and efficient land administration system that provides tenure security for all, including women, pastoralists and other vulnerable groups.

The Project Components are:

Component 1: Increased Tenure Security - Subcomponent 1.1: rural mass certification and issuance of 500,000 Certificates of Customary Rights of Occupancy (CCROs); Subcomponent 1.2: urban mass registration and issuance of 1,000,000 Certificates of Rights of Occupancy (CROs) and 1,000,000 Residential Licenses (RL).

Component 2: Land Information Management - Subcomponent 2.1: Upgrading and upscaling of Integrated Land Management Information System (ILMIS); Subcomponent 2.2: Production of base maps.

Subcomponent 2.3: Enhancement of geodetic framework; Subcomponent 2.4: Support for Valuation Systems (TBC)

Component 3: Institutional Strengthening and Skills Development - Subcomponent 3.1: Legal, regulatory and institutional development; Subcomponent 3.2: Capacity building for the land sector; Subcomponent 3.3: Physical development of the land administration system; Subcomponent 3.4: Support to the Land and Housing Tribunals; and Subcomponent 3.5: Public Awareness.

Component 4: Project Management

D. Environmental and Social Overview

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

The Constitution of Tanzania provides that every person has the right to property. Tanzania’s 1995 National Land Policy (NLP) states that all land in Tanzania is considered public land vested in the President. In 1999 the Village Land Act and the Land Act were published and established three categories of land: General, Reserved and Village Land. The Five-Year Development Plan II (FYDP II) implementation strategy includes the formalization of land rights, resolution of land disputes, and the improvement of processes for investors to acquire land. The current land registration process is not systematic.

Tanzania is a large country with 21 administrative regions and 100’s of districts with varying environmental and socio-economic profiles. Tanzania population is nearly 54 million and is growing rapidly at about 3 percent per year. About a third of the population lives in urban areas and it is estimated that half of the population will be living in urban areas by 2050. 68 percent of the population still lives in rural areas where poverty remains high, with about 10 million defined as poor, and 14 million in the bottom 40 percent (2012). About 73 percent of Tanzanian households depend on agriculture for their livelihoods. The agricultural sector is dominated by small farms which occupy 91 percent of Tanzania’s farmland. Livestock production is a major activity for an estimated 40 percent of smallholder households and 47 percent of large-scale farms.
The project will be implemented in selected regions and districts across Tanzania. The regions were selected on the following criteria: economic potential; demand and readiness for land registration; urban centers where master plans have been prepared or are in the process of preparation; potential or actual occurrence of land conflicts; rural areas with high agricultural potential; urban areas with high percentage of unplanned settlements; and Government priority areas as stipulated in medium and long term economic and physical plans. The following regions were selected to be covered by component 1: Dar es Salaam, Dodoma, Arusha, Tabora, Geita, Pwani, Mwanza, Shinyanga, Tanga and Morogoro. The Districts to be covered include, but are not limited to, Dodoma (Chamwino), Simiyu (Maswa), Ruvuma (Mbinga), Katavi (Mpanda), Songwe (Songwe) and Momba Rural District. This will cover 6-7 percent of the country. Project areas will be reviewed during project implementation and may change depending on emerging priorities as needed. The proposed rural district project areas are dominated by agriculture land uses. Other uses include rangelands for pastoralists used for grazing, residential housing areas as well as social infrastructure. Rangelands are found in Arusha. Due to demographic changes and economic development most villages in rural areas have a village center where community services, markets and village offices are usually located. Land plots in these areas are generally smaller. These centers are surrounded by relatively less densely populated areas beyond which farmland and / or rangeland is located. Villages may also have designated land for other uses including economic activities, quarries etc. However, in some villages free or available land is reducing in size. The main economic activities in rural areas of Tanzania include crop agriculture, animal husbandry, horticulture, floriculture, poultry etc. usually on a subsistence basis. Some residents in rural areas are involved in small business activities such as transportation and selling their crops in urban areas, small business entrepreneurship and in credit schemes. It should be noted that the anticipated 500,000 Certificate of Customer Right of Occupancy (CCROs) to be issued in rural areas will not involve communities adjacent to protected areas as well as pastoral corridors. Monitoring will be carried out to ensure that if and/or when the community is part of the pastoralist groups, there will be measures to ensure that pastoralists are included in all planning and decision making and that equitable solutions are found. Detailed assessment and screening of potential environmental and social impacts will be conducted at site-specific level prior to commencement of implementation of the specific activity. In addition, the project will not start this CCRO process in pastoral areas such as Arusha, but in places where there are no or limited pastoralist-farmer conflicts, so the client and team can build experience. This experience will enable the project to address potential conflicts and design appropriate solutions by involving local NGOs that have a lot of experience dealing with encroachment and community conflicts. The project is not envisaged to affect any biodiversity, water resource, national parks and wildlife corridors or any areas of ecological importance as mass registration will be not be undertaken in these areas. The project’s Environmental and Social Management Framework (ESMF) provides a criteria for environmental and social screening, which guides in the selection of appropriate locations and specific areas for the project activities.

Urban centers in the LTIP areas are predominantly experiencing rapid urban growth and city sprawl as well as demographic changes. These characteristics have imposed increasing demand on land for a variety of uses including housing, economic activities, urban agriculture, social infrastructure, roads, waste and sanitary facilities as well as for institutions such as universities and offices. Settlement patterns in most cases are not organized and as such overcrowding is a common feature. Development controls and legal compliance in terms of ensuring planned settlement and land ownership are common problems. In addition, informal land parceling leading to decreasing plot sizes is a common characteristic. Residents in urban areas are involving in various economic activities including business and entrepreneurship, renting properties, commercial and manufacturing industries. Other common
activities include urban agriculture in different forms such as floriculture, small animal keeping. Incomes are frequently cash based due to the nature of their economic activities.

Land conflicts among land users has been increasing in Tanzania and has mainly involved conflict between smallholder farmers, settled farmers and pastoralists or between large scale farmers or investors who require large tracts of land and small scale farmers, pastoralists or hunter gatherers. In rural areas reported cases of conflicts between farmers and livestock keepers are on the increase due to decreasing natural resources such as land, water and pasture. There has also been conflict between villagers and the government as a result of appropriation of land for public corporations, national parks and game reserve areas. Boundary conflicts also occur between administrative units such as villages, municipalities and districts and that, are mainly triggered by competition over scarce resources which available in the competed area.

Within Tanzania there are a number of pastoralists and hunter-gatherers who are living traditional lifestyles. These groups include the Maasai, Hadzabe, Akie, Sandawe and Barabaig who generally live in the North of the country. The Akie, Sandawe and Hadzabe are predominantly hunter-gathers while the Maasai and Barabaig are traditionally pastoralists. These groups generally traditionally own land communally with few individual land plots and need large tracts of land for seasonal grazing or gathering of natural resources with associated stock routes. Land rights of vulnerable groups including hunter-gatherers and pastoralist communities have a complex history in Tanzania and historically there has been conflict between these groups over rights to land and other natural resources.

Land in Tanzania is generally held under customary tenure arrangements with rules and institutions specific to various ethnic groups and geographies. As such, women’s rights to land are often overlooked as land is usually inherited by males. The ability of women to access land is limited by cultural norms notably inheritance of land by men due to patrilineal kinship systems. Even where women have land, they may not have full rights to that land including not being able to exercise permanent rights over it, not being able to sell the land and not having rights to sell the harvest from the land. Existing norms and processes provide many people with perceived tenure security especially in rural areas. The Village Land Act recognizes communal land and the sharing of land and resources within village boundaries for pastoralists, agriculturalists and hunter-gatherers. Pressure on land is likely to increase associated with urbanization, industrialization and conflict over land rights. Documentation of land rights may help property holders to be more secure and more likely to invest in improvements to the property, as well as reducing potential for land conflicts. There are also many non-governmental organizations (NGOs) and civil society organizations (CSOs) also supporting land formalization efforts. The NGOs focus on: (i) poverty reduction and enhancing livelihood security; (ii) female empowerment; (iii) environmental or wildlife conservation; and (iv) protecting the livelihoods of pastoralists.

Tanzanian labor laws include provisions to protect workers’ rights, including Occupational Health and Safety (OHS). However, implementation especially for individuals or small local contractors (independent builders) in rural areas is weak. Frequently these contractors work without adequate protections in place including risk assessments, the use of Personal Protective Equipment (PPE) and medical insurances. Management of these issues is covered in the ESMF and Labor Management Procedures however, implementation will need to be closely monitored throughout the project.

D. 2. Borrower’s Institutional Capacity

The Ministry of Lands, Housing, and Human Settlements Development (MLHHSD) houses the Departments of Land Administration, Survey and Mapping, Physical Planning, and Housing. It is responsible for land administration throughout the country and supervises eight Zonal Land Administration Offices. District Councils, District Land Offices, and village land authorities are accountable to MLHHSD but are vested in the Presidents’ Office for Regional
The World Bank
Land Tenure Improvement Project (P164906)

Administration and Local Government (PO-RALG). Land disputes are handled by District Land and Housing Tribunals, Ward Tribunals and Village Land Councils.

This will be the first project for the MLHHSD under the new Environmental and Social Framework (ESF) and the first World Bank funded standalone project to be implemented by the MLHHSD. The current capacity to manage social and environmental risks in MLHHSD is low especially in relation to consideration of the rights of Vulnerable Groups in line with ESS7. The capacity of Village Land Councils was assessed during project preparation and is generally limited with variations across the country based on a range of factors including geographical location, previous exposure to land use planning initiatives etc. However, evidence from other projects suggests that with sensitization and capacity building prior to working in the village and support from the technical specialists at the county level they are able to support the land tenure process. The District Field Teams who will implement the project in rural areas also have limited knowledge and capacity regarding environmental and social requirements. Such knowledge may vary between districts depending on the context within their district, but areas of concern include vulnerable groups, seasonal land uses and wildlife corridors. Similarly, the knowledge of the private firms may be limited.

Capacity building and training requirements have therefore been included in the ESMF to increase the capacity of the MLHHSD as well as those involved in implementation on the ground to develop the environmental and social management instruments at all levels and to undertake effective implementation. This includes developing an Environmental and Social Management Unit into which an environmental and a social expert will be hired to provide support and training to the Ministry team. In addition, a GBV expert will be contracted to provide support to develop the GBV Action Plan and undertake training of the PCU and Project workers on issues related to GBV/SEA. The ESMF also includes a training plan covering all levels (national to local) covering issues such as preparation and implementation of environmental and social instruments, screening requirements, consultation approaches, grievance management, and gender considerations including GBV.

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

A. Environmental and Social Risk Classification (ESRC) Substantial

Environmental Risk Rating Substantial

Environmental risk rating is classified as Substantial based on the likely impacts and risks from proposed activities under Component 1 and 3, specifically from construction of 26 Regional Land Offices, one national archive building and renovation of some District Land Offices and the inexperience of the key project implementing entity. Construction works, transportation and handling of construction materials may lead to site specific environmental impacts, which would be mitigated during project implementation. Demarcation and certification processes may pose low risks and impacts associated with installation of beacons for the public land-private land interface in urban areas. Mitigation measures to limit vegetation clearance and potential soil erosion will be specified in the Environmental and Social Management Plans (ESMPs) and undertaken during project implementation. The nature of the proposed activities are not likely to pose any indirect or long-term environmental impacts. No projects activities will be undertaken inside or near protected areas and sensitive habitats. Project activities will be screened for potential direct and indirect impacts on biodiversity and natural habitats, including protected areas and migratory corridors. Since the designs and locations of the proposed physical works or facilities to be financed under the project are not
determined at this stage, the project has prepared an Environmental and Social Management Framework (ESMF). Unforeseen potential risks associated with encroaching into ecological and culturally sensitive areas may arise from land demarcation exercise, if not well planned. The ESMF has considered such risks and recommends actions to be undertaken including screening. The ESMF provides guidance on screening of potential environmental and social impacts and recommend appropriate instruments such as Environmental and Social Management Plans (ESMPs) to be prepared to manage risks in compliance with both the World Bank ESF and the Government guidelines.

**Social Risk Rating**

Substantial

The Project will be implemented nationwide and a range of impacts may occur which the borrower has limited capacity to manage. The social risks related to construction of office buildings are expected to be limited as construction is planned on existing government land. This will limit any resettlement, nevertheless, any informal land users and associated resettlement will need to be identified and compensated. The presence of workers has the potential to result in impacts to community health and safety including increased disease transmission (communicable, sexually transmitted and vector borne), road traffic accidents, accidents at construction sites if communities enter them (including any borrow pits or quarries) and the risk of Gender Based Violence (GBV) or Sexual Exploitation and Abuse (SEA). Excavation may also result in impacts to previously undiscovered cultural heritage although this is considered unlikely. Risks associated with labor and working conditions will also need to be managed including occupational health and safety risks. Related mitigation measures are detailed in the ESMF. In addition, measures to engage the community and address any concerns and perceptions they may have are included in the Stakeholder Engagement Plan (SEP).

The physical regularization of plots (to provide rights of way and easements within settlements) may result in land take. This will be identified through the land use planning process at the village/mtaa level where public land needs will be agreed through a participatory approach. LTIP anticipates that land will be provided through Voluntary Land Donation but recognizes that affected people have the right to refuse and receive compensation. These measures are addressed in the Resettlement Policy Framework. The land registration and certification process may result in other impacts including the presence of an external workforce (Government or private firms) and the associated impacts to community health and safety notably disease transmission and the potential for exclusion of marginalized groups from benefits notably women, people living with disabilities, vulnerable groups (as defined by ESS7) the youth and the elderly.

The systematic process for boundary demarcation and registration of rights includes measures to deal with resulting conflicts, through engagement with all stakeholders, conflict resolution procedures and the development and implementation of a robust and transparent grievance redress mechanism. The need for early sensitization and understanding of potential conflicts has been addressed in the manuals for the project and the SEP. Project activities also has the potential to increase the risk of GBV and SEA associated with the workforce for construction and land registration and certification. These risks have been rated as moderated and are considered in the ESMF which outlines the need to develop a GBV Action Plan at the start of implementation to mitigate the risks.

As this is a nationwide project, risks will need to be considered differentially in relation to different societal groups including any relevant groups under ESS7. Land issues associated with these groups are very sensitive and there is significant potential for conflict if their rights to land are not adequately considered. Risks to these groups include exclusion from land use planning process, failure to recognize their rights to land (especially seasonal rights), the need to undertake planning activities across village boundaries and to recognize the need to maintain stock routes.
Registering of rights may also result in such groups losing access to land especially where land is currently being administered under customary tenure in rural areas or other groups dominate. Where relevant, Free, Prior and Informed Consent will be obtained where the project will have adverse impacts on land and natural resources subject to traditional ownership or customary use.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

Assessment and management of environmental and social risks and impacts are required for all the proposed activities to be financed under the project. The identification and assessment of environmental and social risks and impacts was undertaken during the preparation of the Environmental and Social Management Framework (ESMF) and other instruments and identified that activities under Components 1 and 3 are the most likely to generate environmental and social risks and impacts.

The ESMF provides guidance on the appropriate site-specific instruments such as the Environmental and Social Management Plans (ESMPs). The ESMF also provides guidance and measures for the construction activities and registration/certification and associated management of potential environmental and social impacts, whose scale and likelihood are likely to differ. In addition, those responsible for managing such impacts may also vary. The project’s ESMF includes: i) clear procedures and methodologies for the environmental and social planning, review, approval and implementation of activities to be financed under the project; ii) guidelines for the preparation of site-specific instruments and mitigation plans such as Environmental and Social Impact Assessments (ESIAs), or Environmental and Social Management Plans (ESMP) as per ESMF screening criteria land NEMC guidance iii) appropriate roles and responsibilities, and outlines the necessary reporting procedures, for managing and monitoring environmental and social concerns related to projects components; iv) guidance on assessment of training needs, capacity building and technical assistance needed to successfully implement the provisions of the ESMF; vi) guidance on the project funding required to implement the ESMF requirements.

For the office building construction and renovation, the main environmental and social impacts would be those common in construction works such as clearance of trees, noise, waste, dust, soil erosion, water effluents, sedimentation, air emissions, occupational health and safety issues, effects on public access roads, community health and safety, labor and working conditions, influx and potential for gender-based violence. Impacts associated with biodiversity, protected areas and migratory corridors are not considered to be relevant for construction as the offices will be constructed on existing Government land within urban centers.

During project implementation the borrower will assess the construction of office buildings according to the same risk categories described in ESS1 and manage, supervise and monitor the environmental and social risks and impacts through the project life cycle. These impacts could vary depending on the location of the office buildings and their mitigation measures will be as outlined in the site specific ESMPs. The construction of the office buildings will be subject to an Environmental and Social Impact Assessments (ESIAs) or site-specific Environmental and Social Management Plans (ESMPs) as required under national law and well as ESS1 and the Environmental, Health and
Safety Guidelines (EHSGs) of the Bank. Site specific RAPs may also need to be prepared. Site specific ESMPs will need to be approved and the arrangements for their implementation put in place before commencement of the activities.

For registration/certification activities impacts will include limited vegetation clearance and soil erosion associated with the installation of beacons only to public-private land interface along roads in urban areas, increased traffic movements with the potential for accidents and injuries, occupational health and safety, community health and safety including the risk of GBV, land take (associated mainly with regularization and conflict over land rights). Impacts associated with biodiversity, protected areas and migratory corridors will be avoided through the screening of villages and urban areas to be included in the project. During project implementation measures to address these impacts will be undertaken including establishing and training workers on codes of conduct to guide interactions with the community, extensive community sensitization and awareness raising and the development of specific plans to address issues around vulnerable groups. In addition, grievance mechanisms have been established through which beneficiaries can resolve issues associated with competing land rights. The certification process includes field-based conflict resolution, public display for confirming all rights and boundaries and grievance redress mechanisms.

The social context of Tanzania in relation to land was considered as part of the development of the instruments in particular the baseline section of the ESMF and the VGPF. The existing social contextual information, alongside the engagement undertaken during project preparation, was used to inform the assessment of impacts and the development of mitigation associated with the various project components. The legal context of issuing CCROs and CROs was informed by the legal assessment summarised in the PAD and views of stakeholders notably NGOs working in the land sector on citizen participation in land management, causes of conflict over land and grievance redress mechanisms, vulnerable populations and barriers to participation and attitudes and perceptions regarding the regularization process.

GBV/ SEA risks exist during construction and registration/certification activities associated with the presence of workers. The presence of none-local and local workers could exacerbate the risk of GBV, sexual harassment and/or other sexual offenses including rape. Construction workers may engage in sexual fraternization and transactional sex in particular with younger women and girls. A GBV Action Plan will be developed including codes of conducts for construction workers and a Grievance Mechanism, as outlined in the ESMF to mitigate these risks.

The LTIP will establish an Environmental and Social Management Unit (ESMU) in the national Project Coordination Unit (PCU) will consist of the following:

(i) Environmental Specialist (1) to facilitate and provide technical support on the management of environmental issues including the development of Project Briefs for the ESMPs, supervision of construction activities etc. The specialist will also be responsible for increasing the capacity of the MLHHSD environmental officer.

(ii) Social Specialist (1) to facilitate and provide technical support on the management of social issues including the development of Vulnerable Groups Plans, Stakeholder Engagement Plans, and management of land take (resettlement, voluntary land donation) etc. The specialist will also be responsible for increasing the capacity of the MLHHSD social officer.
(iii) GBV specialist will be contracted to assist the project in developing and implementing a GBV action plan, training and capacity building as well as case handling as needed.

(iv) From the within the MLHSD two officers with environmental (1) and social (1) expertise will be assigned to the Project. They will support the Specialists in the day to day implementation of the project.

At the District level, the Environmental Officer and Community Development Officer will act as the field supervisors at the district level and will be responsible for overseeing environmental and social issues under the guidance of the environmental and social management unit. The Project will hire additional Environmental Officers and Community Development Officers to support implementation in the rural areas, based on the implementation schedule.

In the urban areas, private firms will be contracted and will be required to include in their teams an Environmental Officer and Community Development Officer for each area within which they are working. This requirement will be included as a mandatory role in the Terms of Reference issued for the contract.

The contractors hired to construct the office buildings will hire an Environmental, Health and Safety and Social (EHSS) Manager to oversee the day to day construction activities and ensure compliance with the Environment and Social Management Plan (ESMP), the SEP, GRM and any other instruments prepared for the project. A Supervision Consultant will be hired to oversee construction of office buildings. The supervision consultant will be required to include one Environmental Specialist and one Social Specialist to ensure compliance with the Project environmental and social instruments, national legislation and the WB requirements. They will submit monthly reports to the Environmental and Social Management Unit in the PCU for review and action.

ESS10 Stakeholder Engagement and Information Disclosure

The Project focuses on improving land tenure security across Tanzania and as such will require significant engagement with stakeholders in particular regarding Components 1 and 3 of the Project. The project has prepared a Stakeholder Engagement Plan (SEP) that identifies the relevant project stakeholders, the outcomes of stakeholder engagement and experiences from other projects.

Stakeholder who have been identified include national and district authorities, village councils, communities and individual land owners as well as NGOs and Community Based Organizations (CBOs) in particular those focused on issues of land, women’s rights and Vulnerable Groups. With regard to the community, consideration has been given to the presence of pastoralists, settled farmers and Vulnerable Groups including hunter-gatherers, pastoralists and those without any recognized claim to the land they are living on/ using. The SEP has also identified project affected parties (individuals or groups) who, because of their circumstances, may be disadvantaged this includes the elderly and people living with disabilities who may be less able to participate in participatory planning processes; the youth who often have limited rights to land; women who may be excluded from participatory processes and whose rights to land are not well respected due to cultural norms; pastoralists (who are not part of vulnerable groups) who need land for grazing and those living or using land in protected areas etc.
Following the requirements of ESS10, all stakeholders will need to be engaged with on the various components of the Project. Engagement activities will need to be culturally sensitive and inclusive and consider the presence of groups covered by the provisions of ESS7 to ensure their views are addressed by the Project and that they are not excluded from the engagement process. Similarly, engagement approaches will need to address the needs/challenges of engaging with people living in urban areas. The SEP outlines the phases of engagement that will be undertaken in each village/mtaa starting from sensitization of the regional and district stakeholders, then village leaders and eventually the community using a range of techniques including village meetings and focus group discussions for Vulnerable Groups and marginalized people. The specific measures to ensure the inclusion of vulnerable groups aims to ensure their inclusion in the village planning and demarcation processes such that they are able to benefit from the Project. Free, Prior and Informed Consent (FPIC) will be sought from Vulnerable Groups to implement the project where adverse impacts on land and natural resources subject to traditional ownership or customary use are likely to be impacted.

Due to the complexity of the stakeholder engagement process and potential grievances, the GOT will designate additional staff to support the district teams and the PCU to implement the Stakeholder Engagement Plan. Based on learnings from other projects community organizations will be engaged to facilitate engagement with vulnerable and marginalized groups during the process.

Grievance Mechanism: As part of the Stakeholder Engagement Plan (SEP) grievance mechanism have been put in place to address concerns associated with land (other than resettlement) and general grievances. For land-based grievances a village adjudication committee will be established that will address issues related to surveying, demarcation, boundary disputes etc. The committee must include women to ensure their needs are considered. The general grievance mechanism will use the existing village/mtaa structures to resolve issues. Where grievances cannot be resolved at this level, grievances will be sent to the District for resolution. Grievances associated with land take will also use existing village/mtaa structures with the involvement of the relevant (government or private firm) implementing team. The use of existing institutions is considered appropriate given the relatively short timescale the project will be in any given community and the GoT preference to increase the capacity of these institutions. However, where Vulnerable Groups (ESS7) are present the need to include traditional leaders in the grievance process is discussed in both the SEP and the VGPF.

Meaningful consultations: The government has facilitated consultations through the project preparation with project stakeholders so they can express their views, feedback, concerns, risks and proposed changes and mitigation measures for the project. This has included meetings with CSOs in Arusha and Dodoma who represent the views of Vulnerable Groups and Women, engagement with other government authorities and experts in specific areas such as resettlement; and meetings with a village council where communal land titles have been issued. Further consultation will then take place at the Regional level (based on more detailed mapping for each region) and the local community level for those communities directly engaged in systematic registration processes and will be aligned with the requirements in the operations manuals for the issuing of CROs and CCROs during the early phases of implementation.

Risks associated with transmission of Covid-19 will be assessed and considered prior to undertaking any engagement activities and the SEP will be updated where relevant taking into account any constraints to stakeholder engagement
including requirements for social distancing and limits to gatherings. The Project will consider smaller community meetings and information dissemination via alternative means including radio, social media etc.

Disclosure: The project has established a dedicated web page where it has disclosed project information and the environmental and social instruments (draft and final) to inform stakeholders of the benefits, risks and impacts of the proposed project. As part of Project preparation draft framework documents were disclosed including summaries in Kiswahili. Stakeholders were invited to provide feedback on the documents, to facilitate this the MLHHSD met with the Tanzania Land Alliance (TALA) (a CSO) to discuss their comments. Based on the comments provided the documents were updated. In addition, the information will need to be disclosed in relevant local languages, in a culturally appropriate manner, and in ways that can reach the communities where the project will be implemented.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

The project will include direct, contracted and supply chain workers as follows:

- Direct Workers who will consist of MLHHSD staff who have been designated to work on the project. The number of staff will be relatively few in number and will include a number of existing civil servants. For those who are not Civil Servants all the requirements of ESS2 will apply while for civil servants only elements related to child and forced labor and Occupational Health and Safety are relevant.

- Contracted workers who will consist of construction workers including builders, masons, plumbers etc. who will be nationally contracted for component 3. The overall number of construction workers is likely to be limited in any given location and will mainly consist of unskilled or semi-skilled male Tanzanian nationals. Furthermore, private firms, facilitators and consultants will be hired to provide technical assistance for elements of the project, undertake capacity building and implement elements of Component 1 (in particular in urban areas). These are likely to be limited in number and will consist of highly educated national personnel who will support the project for varying duration. Surveyors will also be appointed on temporary contracts and may include locally hired individuals.

- Primary supply chain workers will mainly work for companies providing materials needed for construction activities. There will be a number of such suppliers across the country for the various construction activities who will provide a relatively limited number of materials.

The use of forced labor is not considered likely on the project given the limited nature of construction, the use of national contracting and that workers will be employed subject to standard contracts. Furthermore, consulting firms and facilitators will be selected on the basis of their skills and qualifications which will include due diligence on labor and working conditions.
Employment of children by contractors may occur as child labor is known to exist in the construction industry in Tanzania. The labor management procedures (LMP) in the ESMF explicitly forbid the use of child labor on the project. For this project persons under the age of 18 are considered to be child labor reflecting that construction is classed as hazardous work and the policies of the MLHHSD. Age verification is required for all employees through the use of national ID cards which are routinely held in Tanzania. In addition, contracts are required for all workers. Contracts with suppliers will require that they do not use child (or forced) labor along with the right to terminate contracts if such issues are identified. As part of the contracting process due diligence will be undertaken of suppliers.

Construction staff face the risk of exploitation and unfair treatment by employers including long working hours, lack of rest periods, irregular payments and lack of contracts. Unskilled and semi-skilled workers unlike skilled workers may lack knowledge of their rights or be willing to waive these rights in order to gain employment. In order to address this the LMP requires that all contracted workers are provided with contracts in line with national law and the provisions of ESS2 and training on the same. All workers will be required to sign a code of conduct with provisions on GBV and SEA and will be trained on the provisions of the code including disciplinary procedures.

The construction of office buildings will involve civil works activities which might cause health and safety hazard risks in terms of incidents and accidents to workers. Poor management of OHS is known to be common in Tanzania including none compliance with national laws. These risks will be managed through a variety of measures as presented in the LMP including the development of OHS plans, use of Personal Protective Equipment (PPE) such as safety boots and gloves for construction workers, good housekeeping on site, fencing of sites etc.

Accidents and emergencies could also occur during the construction and operation of the offices as well as during implementation of component 1 such as fires and road traffic accidents. In order to address these risks an Emergency Preparedness and Response Plan will need to be developed.

Contractors will be required to develop a Grievance Redress Mechanism for their workers in line with the requirements of ESS2 which should include how grievances can be submitted, to who and the time frame within which they will be addressed. An appeals process should also be included in the Grievance Redress Mechanism.

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

Site specific environmental impacts are envisaged from proposed construction of 26 Regional Land Offices, National Archive Building and renovation of a number of District Offices (up to 12). Construction related environmental impacts and risks are likely to include clearance of trees, soil erosion, dust and air emission from construction equipment, etc. The significance of the likely impacts is expected to be low to moderate and will vary depending on the site, hence the environmental and social screening form of the ESMF will be used to determine the site-specific mitigation measures to minimize pollution of water, soil and air. Sources of construction raw materials including sand, gravel and wood products will be screened to ensure that Primary Suppliers abide to authorized areas and observe sustainable harvesting. Use and storage of source of energy for construction machinery and vehicles will be monitored to ensure that risks of pollution from oils is minimized. As per ESMF requirement, mitigation measures will be included in the site-specific ESMPs, which will be prepared prior to commencement of construction works.
ESS4 Community Health and Safety

Civil works may result in impacts to community health and safety which will need to be assessed and mitigated for each office through an Environmental and Social Impact Assessment (ESIA) and/or an Environmental and Social Management Plan (ESMP). Potential impacts to community health and safety include transmission of communicable and/or vector borne diseases as a result of the presence of the construction workforce and poor housekeeping at construction sites. However, given the location and scale of the activities these impacts are expected to be limited. Environmental risks might include contamination of community water sources with construction materials, contamination of soils with construction debris, open pits and liabilities left after the construction.

Community health and safety may also be impacted as a result of the presence and behaviors of personnel involved in systematic activities (demarcation, data collection, regularization, etc.). Risks may include the potential for sexual exploitation and abuse, disease transmission, disruption of local social structures etc.

Any increase in vehicle movements associated with the either construction or registration/certification could also increase the risk of accidents involving members of the community and workers. Workers for these activities may also increase the risk of GBV. A GBV Action Plan will be developed and implemented during the initial stages of project implementation. A number of measures to prevent GBV have been outlined in the ESMF and will be further developed in the Action Plan including recruiting a GBV specialist consultant, requirements to sensitize workers and community on GBV risks and the use of Codes of Conduct to be signed by all workers which will include provisions related to GBV. The project GRMs are designed to receive GBV-related complaints and training for operators of these mechanisms will be provided to ensure any such complaints are handled confidentially. As part of the GBV Action Plans identification of relevant government agencies and/or NGOs in the district who can provide survivor services will be undertaken.

Should structures not be built to a good standard there is the potential for risks to human health and safety. As Tanzania has earthquake prone areas, the designs for the buildings need to be able to withstand such shocks. Building design will be undertaken by the Design and Supervision consultant based on a ToR that will include requirements for structural safety, universal access and user needs. The ToR will be cleared by the Bank to ensure they are in line with the requirements of the ESF.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The LTIP will construct the office buildings on existing government land, this should minimize the potential for physical and/or economic displacement. However, displacement of households that have informally used the land historically may occur and will need to be identified during the development of ESIA/ESMPs. Where displacement of households (physical or economic) is required for the construction of office buildings the project affected persons will need to be compensated for their losses in line with the requirements of the Resettlement Policy Framework (RPF). The RPF requires that compensation is provided at replacement value for land and assets on the land as appropriate.

For both CCROs (in rural areas) and CROs (in urban areas) land use planning is usually undertaken as part of the registration and certification process. Planning standards require that there is a network of roads and/or tracks within a settlement to allow access to individual land plots. The standards indicated that that approach roads should
be 10-20 meter, collector roads 5-7.5 meter and tracks 1-2 meter in villages and that in urban areas these requirements should be determined by the LGA. In order to create this network, physical regularization may be required whereby land owners may lose rights and use of strips of land along the perimeters of their plots. This will result in loss of land although it is expected that this will be limited for any given household. It should be noted that the requirements of ESS5 will not apply to displacement that may result from disputes between private parties during the regularization process (e.g. land lost as a result of a boundary dispute) only land which is acquired for the formation of the road network, creation of protected areas or other Government use, or subject to expropriation or new restrictions. Impacts resulting from all land conflicts will be addressed as part of appropriate Project conflict resolution mechanisms or referred to appropriate channels.

The RPF makes provisions for land take as a result of regularization. A Voluntary Land Donation (VLD) procedure has been developed which is aligned with national law and the requirements of ESS5 which states that (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor’s remaining land area below that required to maintain the donor’s livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. Transparent records of all consultations and agreements reached must be maintained. The VLD requires extensive engagement to be undertaken to sensitize the community to the concept from the initial stages of the project and to provide further information to those affected through implementation to allow affected people to make informed choices and to ensure that households do not suffer negative impacts as a result of the donation. Recognizing that VLD presents a number of risks including peer pressure, economic impacts to the donor, fear of loss of benefits (CROs and CCROs) if they refuse to donate land and potential for conflict within households and between neighbors the process requires that final decisions are made away from community meetings and that people are not excluded from the process if they refuse to donate.

Where VLD is not possible or not acceptable to the affected person the RPF presents the process for developing a RAP which will provide compensation at full replacement cost. Again, this process requires extensive engagement, the valuation of assets and agreement on the compensation to be provided. The RPF also considers the needs of vulnerable households such as those with small land parcels and female headed households to ensure they are not negatively impacted.

The RPF recognizes that Vulnerable Groups (ESS7) face specific risks associated with changes in access to land and land rights. Such risks include loss of access to seasonal land, protection of stock routes, access to natural resources as well as exclusion from the planning process which may impact on their ability to protect their traditional lands. For this reason, the RPF outlines when a Vulnerable Groups Plan will be required and places emphasis on the need to fully engage with these groups to understand their land use across village boundaries as necessary.
In relation to land registration and certification, a series of screening questions has been developed for the specific site selection (villages, communities) so that no mass registration activities are undertaken in protected areas, wildlife corridors, watersheds and other environmentally sensitive areas.

The ESMF also provides guidance on screening project activities for potential degradation of natural resources and ecological systems mainly associates primary suppliers for construction material. The aim is to mitigate the risk of degradation of natural or critical habitats, and to have a mechanism in place to ensure that the Primary Suppliers are not significantly impacting ecosystem or degrading natural habitats. The ESMF and as per requirement of ESS6, provides guidance on the management and harvesting of such resources from authorized areas in a sustainable manner as described in the guidelines. Further assessment will be undertaken at the site-specific location and activity during the preparation of site-specific environmental and social safeguards instruments and mitigation recommended in ESMPs as appropriate.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

The currently identified project areas include locations where Vulnerable Groups are present. As areas may change during project implementation consideration has been given to all VGs during project preparation. A Vulnerable Groups Planning Framework (VGPF) has been prepared to address the needs of VGs.

The key issues covered in the VGPF include:

• Issuance of Communal or Group CCROs: Under Tanzanian laws the issuance of group CCROs on Village Land is possible and has been undertaken previously. The VGPF makes provision for group CCROs to be issued to VGs either when they are the only group present in a village or on parts of land within a village boundary to protect these areas for traditional use.

• Multi- Village Land Use Plan: to ensure that communal land uses across village boundaries are adequate addressed in particular this refers to land that is used seasonally and stock routes. Early identification of the need to undertake such planning is considered key and the VGPF makes provision for early sensitization and engagement with traditional leaders in the communities to understand these needs, participatory land use planning and working with community organizations familiar with these groups to facilitate access to information.

• Engagement: The importance of engagement with VGs is highlighted including the importance of working with traditional leaders to ensure participation of VGs and making sure their voices are heard in the development of VLUPs. This includes the use of community organizations, planning for village meetings and holding focus groups as needed.

Detailed Vulnerable Groups Plans will be developed during project implementation guided by the VGPF this will include the need to understand existing land uses by VGs including seasonal use, stock routes, migratory corridors and traditional knowledge on land management. This information can then be fed into the Village Land Use Plan. The Vulnerable Group Plan (VGP) will also include the requirements for Free Prior and Informed Consent where appropriate and the rights of VGs to refuse the project if they feel it undermines their rights to land. Conflict
resolution procedures have been developed and will be implemented by LTIP to address conflict between the VGs and wider community.

ESS8 Cultural Heritage
The construction of office buildings may have an impact on cultural heritage including disruption to previously unknown archaeological or historical sites. As the office buildings will be constructed on existing government land, impacts to locally important cultural sites are not expected but will be determined during the development of ESIAs/ESMPs for the construction. A Chance Finds Procedure has been developed as part of the ESMF in case of discovery of any unknown archaeological sites during construction.

Impacts to cultural heritage sites as a result of registration and certification are not foreseen. Any sites that were locally important would be identified as part of the land use plan and could be covered by communal certificates.

ESS9 Financial Intermediaries
The Project will not involve the use of financial intermediaries.

C. Legal Operational Policies that Apply

| OP 7.50 Projects on International Waterways | No |
| OP 7.60 Projects in Disputed Areas | No |

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

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED</th>
<th>TIMELINE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
<td></td>
</tr>
<tr>
<td>Environmental and Social Management Framework (ESMF) has been prepared and will be disclosed in country and in the World Bank website prior to project Appraisal.</td>
<td>03/2020</td>
</tr>
<tr>
<td>The MLHHSD will have overall coordination and responsibility for project implementation, including environmental and social management, through the Steering Committee supported by the Technical Committee and LTIP Project Coordination Unit (PCU).</td>
<td>06/2025</td>
</tr>
<tr>
<td>An Environmental and Social Management Unit (ESMU) will be established consisting of:</td>
<td>06/2025</td>
</tr>
<tr>
<td>- 1 Environmental Specialist hired by the PCU;</td>
<td></td>
</tr>
<tr>
<td>- 1 Social Specialist hired by the PCU;</td>
<td></td>
</tr>
</tbody>
</table>
- 1 GBV Expert contracted by the PCU; and  
- 2 MLHHSD Officers (1 environment and 1 social) assigned to the Project.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>The ESMU will disseminate the ESMF, the SEP, VGPF and RPF to key stakeholders; supervise production of the required instruments monitoring effective implementation and reporting on the same.</td>
<td>06/2025</td>
</tr>
<tr>
<td>The Government will conduct the environmental and social assessment for the construction of office buildings in line with national legislation and the requirements of the ESF.</td>
<td>09/2020</td>
</tr>
<tr>
<td>As and when required pursuant to the ESMF, RPF, VGPF and SEP, specific Environmental and Social Impact Assessment (ESIA) and/or Environmental and Social Management Plans (ESMP), Resettlement Action Plans (RAP), Voluntary Land Donation Procedures and Vulnerable Groups Plans (VGP), will be developed and disclosed during project implementation.</td>
<td>06/2025</td>
</tr>
</tbody>
</table>

### ESS 10 Stakeholder Engagement and Information Disclosure

The Government will ensure implementation of the SEP for all project components in accordance with the provisions of ESS10. The SEP may be amended and updated (and redisclosed) as needed during Project implementation.  
06/2025

The Government will ensure that the arrangements for the Grievance Redress Mechanisms (GRMs) covering general grievances (for the project) and land grievances described in the ESMF and the SEP are implemented for all project components.  
06/2025

### ESS 2 Labor and Working Conditions

Labor Management Procedures (LMP) have been prepared as part of the ESMF.  
02/2020

The Government will implement labor management procedures consistent with national legislation and ESS2. These procedures are set out in the Environmental and Social Management Framework.  
06/2025

The Government will ensure that Project workers can access the general grievance mechanism outlined in the ESMF and SEP for any Project-related labor and employment complaints, concerns and comments.  
06/2025

The Government will ensure that Project contractors, consultants and facilitators develop and implement an OHS Plan in line with the risks faced by the workers and implement the same including EPRPs  
06/2025

The ESMU will ensure that all workers are trained on relevant environmental and social issues including worker rights, codes of conduct, GBV mitigation, community sensitization, grievance redress mechanisms and environmental controls.  
06/2025
<table>
<thead>
<tr>
<th>Contractors and private firms will be required to develop and implement Worker Grievance Redress Mechanisms</th>
<th>06/2025</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESS 3 Resource Efficiency and Pollution Prevention and Management</td>
<td>06/2025</td>
</tr>
<tr>
<td>Potential risks and impacts associated with ESS3 have been addressed in the screening form of the project ESMF and will be implemented throughout the Project.</td>
<td>06/2025</td>
</tr>
<tr>
<td>ESS 4 Community Health and Safety</td>
<td>02/2020</td>
</tr>
<tr>
<td>Impacts and risks associated with ESS4 have been covered in the ESMF.</td>
<td>06/2025</td>
</tr>
<tr>
<td>The Government will ensure the use of competent and well trained drivers and that vehicles are well maintained and that the rules of the road in Tanzania are abided by for all vehicle movements associated with the Project.</td>
<td>06/2025</td>
</tr>
<tr>
<td>The Government will ensure that Project workers implement measures to manage specific risks and impacts to the community arising from Project activities consistent to prevent and avoid: traffic accidents, disease transmission etc.</td>
<td>06/2025</td>
</tr>
<tr>
<td>Project workers will be trained on and required to signed codes of conduct which include clauses related to GBV. A GBV Action Plan will be developed which will be implemented in all districts and will include prevention and response measures.</td>
<td>06/2025</td>
</tr>
<tr>
<td>The Government will prepare and implement Emergency Preparedness and Response and Plans (EPRP) in line with the ESMF.</td>
<td>09/2020</td>
</tr>
<tr>
<td>A GBV Action Plan will be developed which will be implemented in all districts and will include prevention and response measures.</td>
<td>06/2025</td>
</tr>
<tr>
<td>ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</td>
<td>06/2025</td>
</tr>
<tr>
<td>For construction of office buildings resettlement impacts will be identified during site screening and the development of site specific ESMPs.</td>
<td>06/2025</td>
</tr>
<tr>
<td>For land regularization identification of potential resettlement will be determined during land use planning noting this may be through voluntary land donation or compensation.</td>
<td>06/2025</td>
</tr>
<tr>
<td>The Project will develop and implement resettlement plans consistent with the requirements of the RPF, ESS5 and national legislation, including the implementation budget and support for resettlement.</td>
<td>06/2025</td>
</tr>
<tr>
<td>The Project will implement the Voluntary Land Donation (VLD) Procedures outlined in the RPF ensuring that project affected people are fully informed and consulted and are aware of their rights in relation to VLD.</td>
<td>06/2025</td>
</tr>
</tbody>
</table>
The Project will undertake monitoring and quarterly reporting on land acquisition and resettlement activities (including VLD) against the indicators included in the RPF.

<table>
<thead>
<tr>
<th>ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</th>
</tr>
</thead>
<tbody>
<tr>
<td>The project will implement the provisions of the Environmental and Social Management Framework (ESMF)</td>
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<table>
<thead>
<tr>
<th>ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</th>
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<tbody>
<tr>
<td>Screening will be undertaken to determine the presence of or potential impacts to one or more of the Vulnerable Groups (VGs) which have been identified in the VGPF as a result of project activities.</td>
</tr>
<tr>
<td>The Government will conduct social studies to assess the nature and degree of the Project’s direct and indirect impacts on Vulnerable Groups who are present in, or have collective attachment to, the project area and to understand their land uses.</td>
</tr>
<tr>
<td>The project will develop and implement VGPs consistent with the requirements of the VGPF and ESS7.</td>
</tr>
<tr>
<td>The project will ensure that VGs have access to the Project Grievance Mechanism. If necessary, the VG could include a functional process/grievance mechanism adapted to the specific requirements of the vulnerable groups.</td>
</tr>
</tbody>
</table>

<table>
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<tr>
<th>ESS 8 Cultural Heritage</th>
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<tbody>
<tr>
<td>The project will implement a Chance Finds Procedure on all projects as outlined in the ESMF. This will be included in all construction contracts</td>
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</table>

<table>
<thead>
<tr>
<th>ESS 9 Financial Intermediaries</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
</tr>
</tbody>
</table>

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

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

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

Reliance on Tanzania’s national Environmental and Social Framework (laws, regulations and procedures) is not being proposed in whole or in part for this project.

IV. CONTACT POINTS

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Telephone No: +1-202-458-7811  Email: vstanley@worldbank.org

Borrower/Client/Recipient
Borrower: Ministry of Finance and Planning

Implementing Agency(ies)
Implementing Agency: Ministry of Lands, Housing and Human Settlements Development

V. FOR MORE INFORMATION CONTACT
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Telephone: (202) 473-1000
Web: http://www.worldbank.org/projects

VI. APPROVAL
Task Team Leader(s): Emma Isinika Modamba, Victoria Stanley
Practice Manager (ENR/Social) Robin Mears Cleared on 20-Apr-2020 at 13:53:39 EDT
Safeguards Advisor ESSA Hanneke Van Tilburg (SAESSA) Conurred on 20-Apr-2020 at 14:33:18 EDT