



# Concept Environmental and Social Review Summary

## Concept Stage

### ( **ESRS Concept Stage** )

Date Prepared/Updated: 04/03/2024 | Report No: ESRSC04199



I. BASIC INFORMATION

A. Basic Operation Data

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P180884	Investment Project Financing (IPF)	Sustainable Cities and Land Project	2025
Operation Name	Sustainable Cities and Land Project		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Cameroon	Cameroon	WESTERN AND CENTRAL AFRICA	Urban, Resilience and Land
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
Ministry of Economy, Planning and Land Planning	Ministry of Housing and Urban Development	01-Nov-2024	15-Jan-2025
Estimated Concept Review Date	Total Project Cost		
12-Mar-2024	200,000,000.00		

Proposed Development Objective

To improve access to infrastructure and services, and to enhance land administration in targeted urban areas in Cameroon.

B. Is the operation 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 Activities

[Description imported from the Concept Data Sheet in the Portal providing information about the key aspects and components/sub-components of the project]

The project supports unlocking potentials of urban development, livability, and land administration in the largest cities as an essential driver of socio-economic growth in Cameroon, through a sustainable, resilient, and inclusive approach that enables private sector development. The project design is complementary to other operations and analytics in



Cameroon by the Bank and development partners and is informed by relevant World Bank operations on large-city transformations, slum upgrading, and urban land management. The project is structured around four components that are interrelated to each other: Component 1. Transformative and Climate-Smart Urban Upgrading. Sub-component 1.1. Upgrading of Urban Infrastructure and Services Sub-component 1.2. Policy Support, Technical Assistance, and Capacity Building Component 2. Improvement of Urban Land Administration Systems. Sub-component 2.1. Policy Dialogue and Capacity Building for Improved Land Administration Sub-component 2.2. Improving Land Tenure Security through Modernized Land Administration Component 3. Project Management, Monitoring and Evaluation. Component 4. Contingent Emergency Response Component (CERC).

## D. Environmental and Social Overview

### D.1 Overview of Environmental and Social Project Settings

*[Description of key features relevant to the operation's environmental and social risks and opportunities (e.g., whether the project is nationwide or regional in scope, urban/rural, in an FCV context, presence of Indigenous Peoples or other minorities, involves associated facilities, high-biodiversity settings, etc.) – Max. character limit 2,000]*

The physical investments of the project will be implemented in Yaoundé (administrative and political capital) and Douala (main port and commercial city), where 30 percent of the country's total population live. The project does not involve associated facilities. Cameroon, with a population of 28.6 million and 2.5% annual growth over the last decade, is among Sub-Saharan Africa's most urbanized countries. About 30% of the national population resides in urban areas. Urbanization, characterized by uncontrolled sprawls and a lack of effective enforcement of urban planning laws, has led to increased pollution, congestion, and inadequate waste management. Informal settlements are home to more than 47 percent of the urban dwellers in Douala and 30 percent in Yaoundé (ECAM4, 2019) who suffer from overcrowding, land insecurity, and a lack of basic services, further complicating urban vulnerability to climate and disaster risks, including landslides and floods. Indigenous Peoples are not present in these cities.

Yaoundé is situated in the center of Cameroon, at an elevation of about 750 meters above sea level, with average temperatures ranging from 19°C to 29°C. The terrain features hilly and mountainous landscapes. Douala, located along the Atlantic coast, is at sea level and near the coast, subjecting it to a humid and tropical equatorial climate with consistently warm temperatures ranging from 24°C to 30°C year-round and high humidity levels. The city's terrain is predominantly flat, with the Wouri River running through it, leading to a significant estuary. Douala's coastal and riverine ecosystems are notable for their mangrove forests, which are critical for maintaining coastal water quality, providing breeding grounds for diverse marine life, and acting as buffers against coastal erosion. The Douala Edéa National Park, a marine protected area of IUCN Category II, is located close to Douala coast.

### D.2 Overview of Borrower's Institutional Capacity for Managing Environmental and Social Risks and Impacts

*[Description of Borrower's capacity (i.e., prior performance under the Safeguard Policies or ESF, experience applying E&S policies of IFIs, Environmental and social unit/staff already in place) and willingness to manage risks and impacts and of provisions planned or required to have capabilities in place, along with the needs for enhanced support to the Borrower – Max. character limit 2,000]*

The project implementation will utilize the institutional arrangement with the most appropriate legal mandates, adequate capacity, and ready mechanisms for executing the project activities. A project Steering Committee (PSC), bringing together key relevant ministries and agencies (e.g., Ministry of Housing and Urban Development (MINHDU), Minister of State Property, Ministry of Estates, Cadastre and Land Affairs (MINDCAF), Ministry of Public Works (MINT),



Ministry of Economy ,Planning and Rgional Developpment (MINEPAT), among others, will provide strategic direction of the project and facilitate vertical and horizontal coordination. The PSC will have a Secretariat in MINH DU to oversee project implementation. Consultations and an institutional assessment of these agencies and the modalities will be performed during project preparation.

The above agencies have no prior experience with implementing the World Bank- Environmental and Social Framework (ESF). Therefore, a related training and capacity building plan will be developed to address this gap as needed. The project will need at least an environmental specialist and a social specialist experienced in resettlement and stakeholder engagement to guide the preparation of the Environmental and Social Management Framework (ESMF), the Stakeholder Engagement Plan (SEP) and Grievance Redress Mechanism (GRM), and Resettlement Framework (RF) during project preparation. The organizational structure for the project implementation including arrangements of communication and coordination for the E&S risk management, E&S staffing for the project’s implementation will be assessed during the project’s preparation.

## II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

### A. Environmental and Social Risk Classification (ESRC)

High

#### A.1 Environmental Risk Rating

Substantial

*[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 2,000]*

There are three types of infrastructure construction activities that the project will finance under the component 1. These include: (i) constructing resilient and green urban flood risk management infrastructure for sustainable urban drainage system and stormwater management, (ii) inclusive and resilient urban transport infrastructure through construction and upgrading of priority road network, to address the major bottleneck and traffic congestions, and (iii) constructing and key market places in the two cities. These are complemented by neighborhood upgrading interventions targeting vulnerable urban settlements, focusing on infrastructure improvements like roads, pedestrian walkways, stormwater drainage, and enhancing public spaces and markets. These civil works within existing urban areas are anticipated to lead to various environmental impacts and risks. Construction and upgrading efforts, especially those related to urban flood management and transport infrastructure, could disrupt local ecosystems, contaminate soil and water, and could lead to inefficient resource use. These interventions might also alter natural drainage conditions, expose workers to hazardous conditions, and generate construction debris, solid and hazardous wastes, noise and air pollution, and traffic congestion and hazards affecting both the urban environment and local communities. Component 2 may lead to environmental risks and impacts due to possible land use changes, including land degradation, disturbed natural drainage, and flood and erosion, among others. The subprojects are neither large in size nor complex. All potential environmental impacts and risks are predictable, localized, temporary, reversible, and low in magnitude. They can be easily and predictably mitigated using standard mitigation measures aligned with World Bank Health and Safety Guidelines and good international industry practices. An environmental and social management framework (ESMF) will be prepared by appraisal.

#### A.2 Social Risk Rating

High

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*[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 2,000]*

The Social risk is rated High and is associated with potential (i) negative and mostly permanent impacts caused by land acquisition and resettlement, resulting in physical and economic displacement, associated to the infrastructure works that will be carried out in very densely populated areas including informal settlements that host the most vulnerable poor people of Yaoundé and Douala (Component 1 Transformative and Climate-Smart Urban Upgrading); (ii) potential social unrest when conducting upgrading activities in poor neighborhoods in Douala and Yaoundé; (iii) the downstream social negative impacts that could emerge from the land management dialogue and land administration and management systems related activities and outcomes that inadvertently could result in involuntary resettlement and compromise existing legitimate rights of some of the most vulnerable people, i.e. inability to register some forms of tenure such as communal customary rights; registering land in areas with informal forms of land tenure, issuance of titles that may result in disqualification and potential eviction of current occupants of parcels (Component 2. Improvement of Urban Land Administration Systems); (iv) poor worker’s work conditions, including OHS and SEA/SH in the workplace, communities and transport systems; and (v) poor vulnerable peoples participation in project’s consultations and access to project benefits. Issues of universal access will be included in infrastructure design. This risk assessment takes into consideration the overall limited capacity and experience of the Borrower managing these E&S risks, particularly the structural problem that the country has been facing in applying the land acquisition policies of the Bank due to legal gaps (i.e., non-eligibility of losses of incomes and valuation method that is not at replacement cost) and firmly rooted institutional long process and complex procedures in the application of their expropriation law.

*[Summary of key factors contributing to risk rating. This attribute is only for the internal version of the download document and not a part of the disclosable version – Max. character limit 2,000]*

**B. Relevance of Standards and Policies at Concept Stage**

**B.1 Relevance of Environmental and Social Standards**

**ESS1 - Assessment and Management of Environmental and Social Risks and Impacts** Relevant

*[Optional Explanation - Max. character limit 1,000]*

The environmental risk of the project has been rated as Substantial. The main environmental risks are mainly attributed to infrastructure construction activities under component 1 and include: ecosystem disturbance, land and water pollution, air pollution, solid and hazardous waste generation, OHS related issues, traffic congestion and hazards, inefficient use of resources, etc. The ESF standards relevant to the project are ESS1, ESS10, ESS2, ESS3, ESS4, ESS5, ESS6 and ESS8. The project involves multiple sub-projects whose locations and designs are unknown, and their specific E&S risks and impacts cannot be determined until the details of the sub-projects have been identified. Hence, the Borrower will prepare and disclose an Environmental and Social Management Framework (ESMF) by Appraisal. The ESMF will outline the principles, rules, guidelines, and procedures for assessing E&S risks and impacts, offering a systematic approach for managing these as sub-project specifics emerge.

**ESS10 - Stakeholder Engagement and Information Disclosure** Relevant

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*[Optional Explanation - Max. character limit 1,000]*

The GoC will prepare a Stakeholder Engagement Plan (SEP) that will be disclosed by project appraisal. Issues to be assessed and documented in the SEP include i) performance track record in engaging with stakeholders and the use of grievance mechanisms in the participatory processes that have been carried out by the GoC in the urban sector, particularly in slums upgrading and land management; ii) barriers to information disclosure and transparent sharing of Project information that could affect meaningful consultations; and iii) specialized needs and approaches to consultation to disadvantaged or vulnerable individuals or groups, including potential prejudice or discrimination, to ensure that stakeholders living in neighborhoods to be upgraded are intensively consulted during project preparation and implementation. The SEP will include the project's beneficiary feedback indicator, which will be reported during project implementation, and the Grievance Redress Mechanism.

**ESS2 - Labor and Working Conditions**

Relevant

*[Optional Explanation - Max. character limit 1,000]*

The GoG will prepare a Labor Management Procedure (LMP) during project implementation. The project will include direct workers, contracted workers, and primary suppliers, all of which will be covered under ESS2. Community workers and security personnel, are not envisaged. The LMP and ESMF will foresee requirements including i) promoting safety and health at work, ii) promoting fair treatment, non-discrimination, and equal opportunity for project workers; iii) protecting project workers, including vulnerable workers, contracted workers, and primary supply workers, as appropriate and development of related occupational health and safety (OHS) plans as part of the ESMF or as standalone plan if needed; iv) preventing the use of all forms of forced labor and child labor; v) supporting the principles of freedom of association and collective bargaining for project workers in a manner consistent with national law; (vi) preventing SEA/SH; and vii) providing project workers with accessible means

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

Relevant

*[Optional Explanation - Max. character limit 1,000]*

The project activities require significant resource consumption, including the use of construction materials which may deplete local natural resources and cause environmental degradation. Water and energy will be required during the construction of all project activities. Moreover, the project is expected to generate substantial construction and demolition waste, including solid waste from workers' camps and market waste. Construction activities are also likely to release dust, pollutants, and contaminants into the air and water bodies, adversely affecting air and water quality. Additionally, noise pollution from construction could disrupt local communities. The ESMF will outline a comprehensive resource management and pollution control approach and provide related guidance and/ or plans in this respect The sub-project-specific ESMPs will provide detail mitigation measures (including a waste management plan (recycling and reuse protocols for construction and demolition waste and dust

**ESS4 - Community Health and Safety**

Relevant

*[Optional Explanation - Max. character limit 1,000]*



The construction and upgrading activities pose significant risks, including increased traffic, which can lead to accidents and heightened safety hazards for both workers and the local population. Furthermore, the dust and noise pollution increase can potentially exacerbate respiratory problems and stress among local residents. The ESMF will include comprehensive mitigation measures to manage increased traffic and construction-related hazards, ensuring the protection of both workers and local communities. The subproject-specific ESMPs will include traffic management plans to minimize disruptions and enhance pedestrian safety; dust control measures and noise reduction strategies to mitigate air quality and noise impacts; and effective grievance mechanisms. In addition, the GoC will prepare a GBV: SEA/SH action plan to mitigate this risk during project's implementation. The project design will ensure universal accessibility to all improved infrastructure.

**ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

Relevant

*[Optional Explanation - Max. character limit 1,000]*

Civil works will require land acquisition, resulting in physical, economic, temporary, and permanent displacement. Those most affected are likely the persons living in densely populated areas, including informal settlements hosting the most vulnerable poor people of Yaoundé and Douala. Likewise, downstream social negative impacts from the land management dialogue and related activities and outcomes could result in involuntary resettlement and compromise existing legitimate rights of most vulnerable people (i.e. inability to register communal customary rights; issuance of titles that may result in potential eviction of current occupants of parcels). The scope of the resettlement is not yet known and will be defined as information on the works becomes available. A Resettlement Framework (RF) will be prepared, consulted upon, and disclosed by the Borrower by appraisal. Site specific RAPs will be prepared, disclosed and implemented by the Borrower during project implementation.

**ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Relevant

*[Optional Explanation - Max. character limit 1,000]*

The Douala Edea National Park is located close to Douala city. It is a vast wilderness consisting largely of mangroves crisscrossed by numerous rivers and swamps, with points of interest for tourists. More preserved areas exist around Yaounde, such as the Mefou proposed National Park, located about 45 km, used as a sanctuary for primates native to Africa and home to a rich and diverse flora. Infrastructure activities will be implemented in urban areas with already modified habitat footprints. However, if the work sites are located near the mangroves in Douala, there is a risk of soil erosion and sedimentation contamination from earthworks. Sourcing aggregates from construction activities might strain local natural resources, impacting flora and fauna. The ESMF will include screening checklists to assess the impacts on the mangroves of Douala. Sub-projects with potential implications for biodiversity will be omitted from the project and a related exclusion list will be prepared.

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

Not Currently Relevant

*[Optional Explanation - Max. character limit 1,000]*



**ESS8 - Cultural Heritage**

Relevant

*[Optional Explanation - Max. character limit 1,000]*

Yaoundé and Douala are rich in cultural heritage. Yaoundé is renowned for its historical monuments and museums that showcase diverse ethnic arts, while Douala is distinguished by its colonial architecture and vibrant contemporary art scenes. If construction activities are carried out close to these sites, there is a risk of damaging cultural heritage sites, including historical buildings, archaeological sites, and areas of cultural significance to local communities. Such impacts can lead to the loss of tangible cultural heritage and disrupt intangible cultural practices and identities, causing the loss of heritage values crucial for community identity and continuity. The ESMF will encompass a comprehensive cultural heritage assessment and a Chance Finds Procedures. Sub-projects will develop and implement a cultural heritage management plan as needed.

**ESS9 - Financial Intermediaries**

Not Currently Relevant

*[Optional Explanation - Max. character limit 1,000]*

**B.2 Legal Operational Policies that Apply**

**OP 7.50 Operations on International Waterways**

No

**OP 7.60 Operations in Disputed Areas**

No

**B.3 Other Salient Features**

**Use of Borrower Framework**

No

*[Optional explanation – Max. character limit 1,000]*

**Use of Common Approach**

No

*[Optional Explanation including list of possible financing partners – Max. character limit 1,000]*

NA

**B.4 Summary of Assessment of Environmental and Social Risks and Impacts**

*[Description provided will not be disclosed but will flow as a one time flow to the Concept Stage PID – Max. character limit 5,000]*

E&S risks are rated High. While environmental risks are considered Substantial, social risks are rated high. Environmental risk is rated Substantial. Types of infrastructure the project will finance: (i) constructing urban drainage system and stormwater management, (ii) construction and upgrading of priority road network and (iii) constructing and

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key market places in the two cities. These are complemented by neighborhood upgrading interventions targeting vulnerable urban settlements, focusing on infrastructure improvements like roads, pedestrian walkways, stormwater drainage, and enhancing public spaces and markets. These civil works within existing urban areas are anticipated to lead to various environmental impacts and risks. Construction and upgrading efforts, especially those related to urban flood management and transport infrastructure, could disrupt local ecosystems, contaminate soil and water, and lead to inefficient resource use. These interventions might alter natural drainage conditions, expose workers to hazardous conditions, and generate construction debris, solid and hazardous wastes, contributing to noise and air pollution, affecting both the urban environment and local communities with hazards and traffic congestion. Component 2 may lead to environmental challenges from land use changes, such as increased land degradation, disturbed natural drainage, and heightened flood and erosion risks. Civil works will be implemented in the existing urban areas, away from environmentally sensitive areas such as mangroves and forests. The size of the subprojects is neither large nor complex. All potential environmental impacts and risks are predictable, localized, temporary, reversible, and low in magnitude. They can be easily and predictably mitigated using standard mitigation measures aligned with WB Health and Safety Guidelines and GIIP.

The Social risk is rated high and is associated with potential (i) negative and mostly permanent impacts caused by the land acquisition and resettlement, resulting in physical and economic displacement, associated to the infrastructure works that will be carried out in very densely populated areas including informal settlements that host the most vulnerable poor people of Yaoundé and Douala (Component 1 Transformative and Climate-Smart Urban Upgrading); (ii) the downstream social negative impacts that could emerge from the land management dialogue and land administration and management systems related activities and outcomes that inadvertently could result in involuntary resettlement and compromise existing legitimate rights of some of the most vulnerable people, i.e. inability to register some forms of tenure such as communal customary rights; registering land in areas with informal forms of land tenure, issuance of titles that may result in disqualification and potential eviction of current occupants of parcels (Component 2. Improvement of Urban Land Administration Systems); (iii) poor worker's work conditions, including Occupational Health and Safety (OHS) and Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) in the workplace, communities and transport systems; and (iv) poor vulnerable peoples participation in project's consultations and access to project benefits. Issues of universal access will be included in infrastructure design. This risk assessment takes into consideration the overall limited capacity and experience of the Borrower managing these environmental and social risks under the WB ESF, particularly the structural problem that the country has been facing in applying the involuntary policy of the Bank due to legal gaps (i.e., non-eligibility of losses of incomes and valuation methods that is not at replacement cost) and firmly rooted institutional long process and complex procedures in the application of their expropriation law.

The project concept states that project implementation will utilize the institutional arrangement that has the most appropriate legal mandates, adequate capacity, and ready mechanisms for executing the activities. A project Steering Committee (PSC), bringing together key relevant ministries and agencies (e.g., Ministry of Housing and Urban Development (MINHDU), Minister of State Property, Surveys and Land Tenure (MINDCAF), and others) will have a Secretariat in MINHDU that oversees project implementation. These agencies have no prior experience with implementing the World Bank- Environmental and Social Framework. The project will need at least an environmental and a social specialist experienced in resettlement and stakeholder engagement to guide the preparation of the ESMF, the SEP and GRM, and RF during project preparation. The organizational structure for project implementation including the E&S staffing will be assessed during the project's preparation. A tailored feature of the institutional arrangement on land acquisition and involuntary resettlement will be designed during project preparation.



### C. Overview of Required Environmental and Social Risk Management Activities

#### C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required by Appraisal?

*[Description of expectations in terms of documents to be prepared to assess and manage the project’s environmental and social risks and by when (i.e., prior to Effectiveness, or during implementation), highlighted features of ESA documents, other project documents where environmental and social measures are to be included, and the related due diligence process planned to be carried out by the World Bank, including sources of information for the due diligence - Max. character limit 3,000]*

The Borrower will prepare, consult on and disclose by project appraisal:

- a) an Environmental and Social Management Framework (ESMF). The ESMF will incorporate screening procedures to determine ES risk levels of proposed subprojects and guidance for preparing ESIA and ESMPs for subprojects.
- b) a Stakeholder Engagement Plan (SEP)
- c) a Resettlement Framework (RF) informed by a social analysis.
- d) the Environmental and Social Commitment Plan (ESCP) with the support of the Bank's team.

The Borrower will prepare, disclose, and consult on a GBV: SEA/SH Plan, a Labor Management Procedures during the project’s implementation (exact time to be defined during project preparation and reflected in the ESCP), Environmental and social impact assessment (ESIA) the number ESIA will be determined during project preparation.

A Hands-On Expanded Implementation Support( HEIS) for the project's preparation will be explored

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### III. CONTACT POINT

#### Contact Point

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#### **IV. FOR MORE INFORMATION CONTACT**

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#### **V. APPROVAL**

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