



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 08/06/2020 | Report No: ESRSC01535



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Bosnia and Herzegovina	EUROPE AND CENTRAL ASIA	P174604	
Project Name	BiH Firm Recovery and Support Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Finance, Competitiveness and Innovation	Investment Project Financing	8/13/2020	10/29/2020
Borrower(s)	Implementing Agency(ies)		
BiH Ministry of Finance and Treasury, RS Ministry of Finance, FBiH Ministry of Finance	RS Investment Development Bank, Federation BiH Development Bank		

Proposed Development Objective

The Project Development Objective is to support recovery for private firms affected by the economic impact of COVID-19 through access to finance and consolidated firm-targeting public support programs.

Financing (in USD Million)	Amount
Total Project Cost	63.54

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

Yes

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

In order to respond to this unprecedented crisis that has hit hardest those most vulnerable, and in light of uncertainties that lie ahead, this project aims to increase liquidity support to MSMEs including underserved segments of the economy while helping firms adjust to the new normal through tech adoption and digitalization. The Project focuses on MSMEs that are hit hard by the crisis, are in the lagging regions and are part of the vulnerable and underserved segments that would face challenges accessing working capital and investment financing. The unique design ensures a targeted approach, combining working capital and investment financing to support COVID-19



affected and undeserved MSMEs throughout the recovery phase. The participation of microcredit and leasing institutions in the line of credit component is particularly important for reaching those underserved by the traditional banking products and those in lagging regions, as well as reducing some of the existing constraints with regards to collateral requirements. Furthermore, the Project will support the authorities in the design of targeted support programs focused on tech adoption and digitalization aimed at helping firms adjust to the post COVID-19 world.

The project will consist of three components:

Component 1 - Line of credit: will consist of a line of credit aimed at providing financial firepower to privately-owned MSMEs affected by the COVID-19 outbreak. The Project financing will be channeled via intermediaries – Participating Financial Intermediaries (PFIs) that meet the eligibility criteria for participation – and administered through Project Implementation Units (PIU) in the RS the Investment Development Bank (RS IDB) and the FBiH Development Bank. Specifically, the component will focus on firms’ immediate working capital and investment needs, thereby ensuring that firms weather the crisis and regain regular operation and growth in the aftermath. The project will target MSMEs that were affected by the COVID-19 crisis but that remain financially viable and are likely to survive the crisis if provided financing to meet temporary liquidity needs.

Key target groups to be financed will include:

- Target Group 1 – Highly Impacted Enterprises: Firms that experienced at least a [20] percent drop in gross sales/turnover in Q2 2020 compared to Q2 2019.
- Target Group 2 – Underserved Enterprises: High-risk perception towards certain categories of enterprises including women-inclusive enterprises and young enterprises results in higher credit rationing to these groups even in normal times. These firms are expected to be impacted heavily by the COVID-19 crisis and will therefore be eligible for support under the proposed Project, irrespective of firm level impact.

Component 2 - Strengthen the institutional and program framework in support of firm recovery and growth – via performance-based conditions (PBCs). The objective of this component is to refocus government programs in support of firm growth and help build capabilities aimed at raising productivity, furthering recovery and building resilience of MSMEs in the aftermath of COVID 19. This would include streamlining existing entrepreneurship and innovation programs through better targeting, outreach and selection and establishment of systematic monitoring and evaluation (M&E) mechanisms to assess their operations and effectiveness. The improved alignment and targeting of policy instruments will aim to improve the competitiveness and productivity of BiH enterprises and opportunities for entrepreneurs in the post-COVID-19 new normal. The project will focus on getting firms to adopt new technologies, including digital operation to operate in the new normal that requires physical distancing and includes movement restrictions for the foreseeable future. Moreover the development of appropriate M&E mechanisms are key including systemic reporting and collection of data on specific input and output indicators related to the implementation of the innovation and entrepreneurship (I&E) support programs. This data is instrumental to monitoring the progress of the instruments towards achieving their stated objectives; alternatively adjusting the design, targeting, or selection for that purpose.

Component 3 - Project Management: There will be a small project management component, needed for the full operation of the project PIUs. The component will finance operation of the two PIUs and will include operational, procurement, environmental and social safeguards and project audits.

This Project is in line with the policy objectives set in the current WBG Country Partnership Framework (CPF) for BiH (2016-2020). Supporting a competitive business environment and access to finance are listed under Focus Area II



(Creating Conditions for Accelerated Private Sector Growth). In addition, the Systematic Country Diagnostic (SCD) Update (June 2020) concludes that priority areas for BiH remain largely the same as those identified in 2015 and the summary of reform priorities maintain that in order to make it easier to do business in BiH, maintaining financial stability and expanding access to finance, along with improving entrepreneurship is crucial.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project will be implemented country-wide, in both entities of Bosnia and Herzegovina: Federation BiH (FBiH) and Republika Srpska (RS). The country has a population of roughly 3.3 million and is located in the heart of the Balkan Peninsula bordering Croatia, Montenegro and Serbia with a 22 kilometre seashore access to the Adriatic Sea through the coastal town of Neum. The country belongs to the Adriatic Sea watershed and Black Sea watershed respectively, with a high percentage of rural and forested areas.

The COVID-19 pandemic was confirmed to have reached Bosnia and Herzegovina on 5 March 2020 in a patient in Banja Luka, returning from Italy. On 21 March 2020, the first death in the country from COVID-19 was announced in a hospital in Bihać. As of July 13, 2020, 6,981 COVID-19 cases have been confirmed in Bosnia and Herzegovina (BiH) with 226 COVID-19 associated deaths. The greatest concentration of cases in RS is in Banja Luka and the current number of COVID-19 related deaths is 139. In the FBiH, there are currently 3,712 cases, with 82 deaths.

The incidence of the virus and required policy responses, such as movement restrictions, have disrupted supply and reduced demand for most parts of the economy, while the uncertainty is driving down the investments. Disruption in supply chains and lower demand from the EU will cause declines in both manufacturing and exports of goods and services. COVID-19 also risks accelerating BiH's high pace of outward migration, already the highest in the region.

The most directly impacted industries in BiH were hospitality industry (accommodation, leisure, food service) while textiles and fabricated metal sectors experienced the worst hit with regard to supply chain disruptions. Nevertheless, impact of the virus is expected to affect the entire economy. MSMEs play a very important role in the BiH economy due to their role in generating income and employment. As of mid-2019 there are 38,537 active businesses operating in BiH, out of which 98.9 percent are MSMEs. MSMEs are estimated to account for 70.2 percent of total employment, 69.1 percent of total turnover and 62.4 percent of total valued added at factor cost in BiH. The sectoral distribution of MSMEs showcases MSMEs' high concentration in the non-tradable service sector. According to a recent survey conducted by Foundation 787, 72.7 percent of respondents had already discontinued their operations, while 16.4 percent remained active by introducing an alternative form of business. In addition, 71.5 percent of the respondents reported that the crisis already had a very negative impact on their business and revenues. Women reported somewhat worse outcomes than men, with 73.3 percent of female respondents sharing a very negative experience as opposed to 69 percent of males.

The Bosnia and Herzegovina Emergency Firm Support Project aims to ensure continued access to finance and access to government firm support programs for private firms affected by the economic impact of COVID-19. The project will target MSMEs, which were deemed most vulnerable with respect to access to finance, and facilitate their access to



finances for their operations in terms of working capital or investments which would help them cope with the aftermath of the Covid-19 pandemic. The scope of the activities or potential sectors have not yet been defined within the project, and the actual selection of the participating MSMEs will be based on the actual impact caused by the pandemic.

The eligibility criteria established for the project will exclude the following types of activities from project financing: sub-projects with substantial and/or high risk, sub-project activities requiring land acquisition and involuntary resettlement, and those with impacts on sensitive areas (for example, nationally and internationally protected areas) and cultural heritage. Child and forced labor will be excluded as well.

D. 2. Borrower’s Institutional Capacity

The project wi

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The project will be implemented through two PIUs within the RS IDB and the FBIH DB respectively. The PIU teams will be working solely for the purposes of this project and will be staffed according to the project needs. The two Banks will act as Financial Intermediaries (FIs) and will be working with screened commercial banks in each of the respective entities (FBIH and RS) to facilitate further onlending.

Neither of the two Banks has an established Environmental and Social Management System (ESMS), and while the RS IDB does have experience with implementing World Bank financed projects under safeguards and is staffed with a dedicated environmental and social specialist, the FBIH DB will employ a full time specialist to cover these areas prior to project effectiveness. The commercial banks, i.e. PFIs (Participating Financing Institutions) yet to be determined for participation in the project, will need to comply with the project-level ESMS, as based on the former SME support project, only one or two of the participating banks had some sort of an ESMS in place.

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

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The project environmental risk is classified as Moderate due to the activities under the Component 1 and the assessment of the Borrower capacity to conduct adequate environmental and social management. The credit line under this component will address various working capital and investment emergency needs, that are yet to be defined. Activities with substantial and high environmental risk are likely not to be supported, as the credit line will support MSMEs that tend not to be involved in such activities through the nature of their businesses. More clarity on the actual scope and type of activities supported will be available later.

The FIs in the project - the RS IDB and the FBIH DB, do not have operating ESMS satisfactory to the Bank. For the purpose of the project, FIs will upgrade the existing ESMS to fully correspond to ESF requirements, including, but not limited to: developing eligibility and exclusion criteria and screening procedures, developing E&S risk management processes for respective risk categories, creating monitoring and reporting procedures, and compiling environmental management-related policies and procedures into a unified document.

Considering the fact that the activities to be financed include investments and working capital that are yet to be defined, but also that are to be implemented within the scope of activities of MSMEs and SMEs, as well as the fact

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that the ESMS is to be developed satisfactory to the Bank and consistent with the ESF, the environmental risk is rated as Moderate.

Social Risk Rating

Moderate

The project social risk is classified as Moderate due to the activities under the Component 1 and the assessment of the Borrower capacity to conduct adequate environmental and social management. The credit line under this component will address various working capital and investment emergency needs, that are yet to be defined. Activities with substantial and high social risk are likely not to be supported, as the credit line will support MSMEs that tend to not be involved in such activities through the nature of their businesses. Further, there will be a screening of all sub-projects to ensure that the project will not support any activity having involuntary resettlement, or significant adverse social risks. More clarity on the actual scope and type of activities supported will be available only under project implementation. At the institutional level, one Bank has experience in managing social risk. While the other Bank does not have hands on experience, they are on board with building their capacity to adequately manage social risk. Specifically this will focus on risk screening and outreach and information to stakeholders as well as an efficient two way grievance management system. The risk rating can be reviewed once implementation is underway and activities are more clearly defined.

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:

This standard is relevant for activities under the Component 1. Project will support small investments and working capital operations of MSMEs that are yet to be defined, if at all. Purchase of chemicals or pesticides, operations producing large quantities of hazardous waste and those of substantial and high risk will not be eligible for financing, in addition to those listed on the WB exclusion list. A number of additional activities would be included specific to this project. Understanding that the project will support MSMEs, and that this would not include any major industrial polluters, the project is not expected to produce significant environmental impacts, and the expected potential impacts, therefore, will be readily addressed by national regulatory and institutional framework. As per the relevant BiH legislation (legislation of RS and FBiH), companies are subject to environmental impact assessment and environmental permitting that includes condition to apply relevant mitigation measures for environmentally damaging installations.

FIs (RS IDB and FBiH DB) and PFIs under this project will be required to develop their own ESMSs, apply and maintain them with adequate capacity in place. The PFIs will be required to develop and implement satisfactory ESMSs to address and manage the environmental and social (E&S) risks of the project-supported activities. The two project PFIs will regularly monitor the E&S due diligence including monitoring of subloans conducted by PFIs, and report the result to the Bank periodically. As part of the credit approval procedure, E&S due diligence will be conducted by each PFI for their respective sub-borrowers' financed activity. Given the purpose of the project and the eligibility criteria set forth for the separate credit line, it is anticipated that finance will be mainly utilized as working capital and investments to support the entire existing business enterprises affected by the COVID -19 pandemic. Proportional to the sub-project

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risks, the PFIs will supervise MSMEs using their own ESMSs, while RS IDB and FBIH DB (as the FIs) will monitor compliance of PFIs with FI's ESMS. Details of FIs' and PFIs' ESMSs is discussed under ESS9 section.

The eligibility criteria established for the project will exclude the following types of activities from project financing: sub-projects with substantial and/or high risk, sub-project activities requiring land acquisition and involuntary resettlement, and those with impacts on sensitive areas (for example, nationally and internationally protected areas) and cultural heritage. No major civil works are expected for any of the sub-projects. Child and forced labor will be prohibited under the Exclusion Lists of FIs.

In terms of vulnerable and target groups, it must be noted that the project will support both (i) Highly Impacted Enterprises: Firms that experienced at least a [20] percent drop in gross sales/turnover in Q2 2020 compared to Q2 2019; and (ii) Underserved Enterprises: High-risk perception towards certain categories of enterprises including women-inclusive enterprises and young enterprises results in higher credit rationing to these groups even in normal times. These firms are expected to be impacted heavily by the COVID-19 crisis and will therefore be eligible for support under the proposed Project, irrespective of firm level impact. As needed, a further desk-based screening (social) assessment may be conducted to inform the further targeting of activities/industry types that may be given priority.

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

The Borrower Framework will not be used for the Project.

ESS10 Stakeholder Engagement and Information Disclosure

A Stakeholder Engagement Plan (SEP) is already developed, as the project was initially going to be processed as an Emergency operation. The SEP identifies and analyzes key stakeholders (i.e. affected parties, other interested parties and disadvantaged and vulnerable groups) and describe the process and modalities for sharing information on the project activities, incorporating stakeholder feedback into the Project and reporting and disclosure of project documents.

Project preparation has included a detailed mapping of the stakeholders. The project aims to target Highly Impacted Enterprises: Firms that experienced at least a 20 percent drop in gross sales/turnover in Q2 2020 compared to Q2 2019. It will also specifically target Underserved Enterprises: High-risk perception towards certain categories of enterprises including women-inclusive enterprises and young enterprises results in higher credit rationing to these groups even in normal times. These firms are expected to be impacted heavily by the COVID-19 crisis and will therefore be eligible for support under the proposed project, irrespective of firm level impact. Project beneficiaries will be the firms, their staff and the population at large who benefit from the goods and services of the enterprises that are supported by the project.

The SEP will help with reaching to the firms that are financially adversely affected by the economic impacts of COVID-19 pandemic, while at the same time relying on stakeholder engagement strategies to minimize close contact and follow the physical distancing procedures. The strategies for information disclosure and consultations will mainly rely on digital technologies, virtual meetings and focus groups, social media and FIs' webpages. Any face-to-face meetings and consultations will resume only after the government rules on restrictions on social gatherings are eased and lifted.



The FIs have established External Communications Mechanism to receive concerns, complaints, suggestions and feedback from loan beneficiaries as well as those who believe may be adversely affected by the activities of FIs as well as loan beneficiaries. Detailed grievance mechanisms (GM) procedures are presented in the SEP including departments responsible to receive and address grievances, different means of receiving grievances (e-mail, webpage, phone number, mail) and stipulated time frames to address and respond to grievances. The FIs will establish databases to log complaints. SEP includes strategies to report back to stakeholders during project implementation.

The SEP will be updated by Appraisal to include feedback received during virtual consultations and refined consultation strategies and modalities with due consideration of measures in place at such time. The final SEP will be shared with relevant stakeholders via culturally appropriate means.

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

This standard is relevant. ESS2 requirements will apply to the employees of the 2 FIs. The two Banks will act as FIs and will be working with screened commercial banks in each of the respective entities (FBiH and RS) to facilitate further onlending to MSMEs in BiH. Both Banks have a set of human resources policies and procedures in place which meet the requirements of ESS2 and national labor and OHS legislation. The human resources policies of all PFIs also use the same norm as the Banks and hence these will also be assessed against the ESS2, national labor and OHS legislation during project implementation. In ESCP, the 2 FIs will commit that any consultants directly hired by them to carry out the activities related to the project, will be employed under the terms and conditions as required by the national labor law and ESS2. ESCP will include requirement that PFIs have human resources policies and procedures consistent with ESS2 and national law requirements. The project will not engage community and primary supply workers as per ESS2 definition.

The FI Banks will ensure that national labor and OHS laws, and ESS2 are applicable throughout the life of project to its own employees, and PFI employees. Both FI's employee are subject to the BiH Labor Code. Recent assessment by the World Bank found the BiH largely in line with ESS2 with only some minor gaps.

Assessment of labor management procedures: Both FI Banks have human resource policies which define employees' rights such as compensation and wages, working hours, overtime hours and payment, leaves (maternity, annual, sick, unpaid), recruitment, training, promotions, severance payment, disciplinary measures, non-discrimination and equal opportunity. The policies prohibit forced labor and the minimum working age is 18 years. Human resources procedures prohibit harassment including sexual harassment and provide for mechanisms to report such cases. Human resources policies are accessible to employees on FIs intranet webpages sites.

The banking regulation in BiH requires all banks to establish grievance mechanism for customers and employees. The FIs have such grievance mechanisms established, and these are described in the SEP. The GM for employees is



accessible via intranet webpages, and employees can also lodge grievances to the human resources departments. In addition, employees can raise workplace ethics concerns.

An assessment of labour laws and procedures in the country done by the World Bank concluded that labor management procedures in BiH, including procedures relating to working conditions and terms of employment, nondiscrimination and equal opportunity, grievance mechanisms and OHS meet the requirements of ESS2. Similar documentation shall be reviewed for PFIs as well, when beneficiary PFIs are identified during project implementation.

In line with ESS9, both FIs, through respective ESMSs, will apply relevant requirements of ESS2 to sub-projects - SMEs recipients of loans. Exclusion Lists will include prohibition of financing of activities involving forced and child labor and screening and monitoring of sub-projects will include compliance with national labor and OHS laws. Legal agreements between FIs and loan recipient firms will include requirements for compliance with national labor and OHS laws. Labor and working conditions risks and impacts will be identified, assessed and addressed within the scope of the FIs ESMS in accordance with relevant ESS2 requirements.

GMs established by both FIs will provide an avenue for employees of sub-projects firms to report any non-compliance with project procedures including labor issues. GBV complaints will also have a grievance channel.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant. The potential issues related to the project such as air emissions, water releases, energy efficiency and waste management at the sub-project level will be mitigated through implementation of ESMS. The ESMSs which are fully discussed under ESS 9, will include all the necessary processes and procedures to ensure site specific considerations related to resource efficiency, pollution prevention and management will be addressed and managed. Environmental risks of sub-projects which might cause significant pollution impacts, will be rated as High or Substantial and thus be considered ineligible for financing.

ESS4 Community Health and Safety

This standard is relevant though it is less likely that the implementation of sub-projects would cause any adverse impacts associated with the community health and safety. In case that such impacts are identified, these will be assessed and addressed within the scope of FIs' and respective PFI's ESMSs in accordance with ESS4 requirements. No labor influx is anticipated given the project focus on jobs' preservation, small scale and working capital operations as well as size of supported companies.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is not currently relevant. No sub-project involving involuntary land acquisition and resettlement will be included for financing. This screening will be part of the ESMS.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources



This standard is not relevant, and sub-projects which might adversely impact biodiversity conservation and sustainable management of living natural resources will not be eligible for financing within the scope of the project.

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

This standard is not relevant.

ESS8 Cultural Heritage

This standard is not relevant, and sub-projects having impacts on cultural heritage will not be eligible for financing within the scope of the project

ESS9 Financial Intermediaries

This standard is relevant. FIs, being RS IDB and FBiH DB, and PFIs will be required to develop and implement satisfactory ESMSs to manage environmental and social risks of the project. Since the loan will be implemented as a separate and traceable credit line, ESS9 will apply only to the purposes envisaged by the project documentation, and not the entire portfolios of FIs and PFIs, as will be defined in the ESCP.

Under this project, sub-projects will be screened for environmental and social risks prior to the loan approval, within FI's/PFIs' ESMSs approved by the World Bank. In the course of project preparation and implementation, both FIs shall develop and implement ESMSs prior to Appraisal and PFIs - before commencing of onlending activities to MSMEs. Namely, each PFI, having an overarching E&S policy approved by senior management for its lending activities, will describe the scope of portfolio to be financed from the project proceeds and the sub-project appraisal procedures. The appraisal procedures will include screening against an Exclusion List, , procedures for risk classification, identification, assessment and management of the environmental and social risks and impacts; monitoring and review procedures and other elements of ESMS, consistent with the ESF.

The ESMS implementation procedure will ensure that prior to the loan approval, sub-projects are screened for E&S risks by PFIs according to their ESMSs approved by the World Bank. The process will ensure filtering out all but low and moderate-risk activities, including purchase of chemicals and pesticides, those generating large quantities of hazardous waste, those taking place or impacting natural protected or sensitive areas as well as those activities potentially devaluing physical cultural heritage. Compliance with national environmental, social, labor and OHS laws will be required as per requirements of the relevant ESSs.

The two FIs will require the PFIs to have an ESMS in place and E&S assessment procedures which are in full compliance with the corporate ESMS requirements of FIs, the ESF and acceptable to the World Bank. In this respect, FIs will provide support to PFIs. FIs will ensure that PFIs have ESMSs in place, which are acceptable to the Bank, before any sub-loans are approved. PFIs will monitor the entire World Bank-financed portfolio and report to FIs, in a manner which is acceptable to the Bank. FIs will be required to monitor and supervise the environmental and social performance of the PFIs and their portfolio exposures on this credit line. The content of semi-annual reports will be detailed in the Project Operational Manual. The World Bank will monitor FIs, while they will monitor the E&S performance of PFIs for their sub-borrowers under this credit line. The World Bank will conduct prior review for an



initial 5-10 set of sub-projects of PFIs and thereafter conduct supervision spot checks for a number of sub-projects. The details of prior and post review will be described in the Project Operational Manual.

B.3 Other Relevant Project Risks

None identified at this stage.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

No potential financing partners identified at this stage.

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

Actions to be completed prior to Bank Board Approval:

Develop ESMS acceptable to the Bank and in line with the ESF prepared for the two main participating FIs. PFIs need to have ESMSs prior to commencing on-lending.

Develop final SEP

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

Development of ESMSs by PFIs to the satisfaction of FIs prior to the commencement of on-lending by PFIs

Continued implementation of the ESMS and SEP

Adequate staffing and training

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 20-Aug-2020

IV. CONTACT POINTS

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World Bank

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Borrower/Client/Recipient

Borrower: BiH Ministry of Finance and Treasury

Borrower: RS Ministry of Finance

Borrower: FBiH Ministry of Finance

Implementing Agency(ies)

Implementing Agency: RS Investment Development Bank

Implementing Agency: Federation BiH Development Bank

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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Safeguards Advisor ESSA	Agnes I. Kiss (SAESSA) Cleared on 06-Aug-2020 at 15:24:55 EDT