



Project Information Document/ Identification/Concept Stage (PID)

Concept Stage | Date Prepared/Updated: 05-Apr-2025 | Report No: PIDDC00816

**BASIC INFORMATION****A. Basic Project Data**

Operation Name	Operation Short Name
Digital Skilling for Employment	DSE
Operation ID	Financing Instrument
P506407	Investment Project Financing (IPF)
Beneficiary country/countries	Region
Lebanon	Lebanon
Environmental and Social Risk Classification	
Moderate	
Date PID Prepared	Estimated Date of Approval
20-May-2024	16-Jun-2025
Borrower(s)	Implementing Agency
Forward MENA, Digital Opportunity Trust (DOT)	Forward MENA, Digital Opportunity Trust (DOT)

PROJECT FINANCING DATA (US\$, Millions)**SUMMARY**

Total Operation Cost	3.87
Total Financing	3.87
Financing Gap	0.00

DETAILS**Non-World Bank Group Financing**

Trust Funds	3.87
Forced Displacement Trust Fund	2.05
Japan Social Development Fund	1.82

B. Introduction & Context**Country Context**

Lebanon is six years into an economic and financial crisis that is among the worst the world has seen, exacerbated by the recent conflict. The World Bank's 2021 Lebanon Economic Monitor (LEM) ranked Lebanon's financial and economic



crisis as one of the top three most severe crisis in the world since the mid-19th century ([World Bank 2021](#)). The October 2019 crisis has been further exacerbated by the dual impact of the COVID-19 outbreak and the massive Port of Beirut (PoB) explosion in August 2020, which all together affected people's health, livelihoods, and wellbeing. The Lebanese economy had been contracting for a prolonged period (by 21.4 percent in real GDP in 2020, 7.1 percent in 2021, and 2.6 percent in 2022). Prior to October 2023, economic growth was projected—for the first time since 2018—to expand in 2023 (by 0.2 percent) slightly. By February 2023, the currency lost more than 98 percent of its pre-crisis value. The depreciation of the parallel market exchange rate has accelerated since the beginning of 2023, breaching 100,000 LBP/US\$ amid rising tensions, bank strikes, and relatively fewer Foreign Exchange (FX) interventions by Banque du Liban (BdL). The exchange rate stabilized temporarily in the latter part of 2023, driven by a decrease in the demand for dollars, as well as foreign exchange interventions by the BdL in the first half of 2023, along with an increase in foreign exchange inflows from tourism and remittances. This situation is further exacerbated by the recent conflict that initially started in October 2023 but faced significant escalation between September and November 2024, sparking a wave of internal displacement and emigration.

Although the multiple crises have had a major impact on employment and jobs, some high-growth potential sectors are doing relatively better, including in technology and digital sectors. Prior to the 2019 crisis, Lebanon had already grappled with labor market issues, including stagnant job creation, inability to produce high-quality jobs, low workforce engagement—particularly among women—youth unemployment, skill gaps, and a prevalence of informal, low-yield employment. With the onset of the crises, the labor situation worsened, marked by rising joblessness due to firings, voluntary job exits, and widespread business shutdowns, which in turn fueled the informal sector. This elevated inactivity among the Lebanese workforce saps both the economy and human capital. Nevertheless, certain industries like agriculture and agro-food are experiencing growth, potentially replacing costly imports with local goods amid currency devaluation. Moreover, the drop in average wages has rendered Lebanese labor more globally competitive, notably in sectors such as ICT, where outsourcing opportunities lie in customer relationship management (CRM) services, software/applications development and integration, engineering design and consulting, marketing services, business consulting and market research, and telemedicine/remote education ([BCG MENA Talent Map, 2023](#)). With a skilled talent pool, Lebanon can provide services ranging from managing customer relationships and developing software solutions to offering engineering design and marketing expertise.

Technology and digital sectors are expanding globally, and remote work trends, such as gig work, are impacting job dynamics, providing much needed work opportunities for workers in Lebanon. The necessity for all populations to have access to internet and be digitally literate and skilled has never been more important. Globally, it is estimated that 44 percent of workers' skills will be disrupted in the next five years, 83 million jobs will be displaced by 2025 while 69 million jobs will be created ([World Economic Forum, 2023](#)). Six in ten workers will require training before 2027, but only half of workers are seen to have access to adequate training opportunities today ([World Economic Forum, 2023](#)). In addition, globally, almost one quarter million youth are engaged in online gig work (out of the 435 million gig workers of all ages). In Lebanon for instance, the share of youth engaged in gig work stands at 52 percent, one of the highest alongside Egypt, Morocco and Tunisia ([S4YE, 2023](#)). The Online Labour Index (OLI) indicates a 41 percent increase in demand for gig work between 2016 and Q1 2023, accelerated by the COVID-19 pandemic ([S4YE, 2023](#)). Considering the youth bulge effect in the region, including in Lebanon although the window of demographic dividend is passing, as well as the high unemployment rate, opportunities brought by the digital and tech sectors should be seized to find income generating activities and jobs to youth across different skills levels.

A critical risk to the project's implementation is the potential disruption of internet connectivity and electricity, both of which are vital for the project's success. These disruptions may hinder consistent progress. However, since much of the work is conducted online and leverages regional and global markets, the project also presents a unique opportunity to provide stable income despite these local challenges. While these infrastructure issues are beyond the project's scope to resolve, the digital nature of the work offers resilience in uncertain times. The project will also prioritize implementation in safe areas and will take into account possible virtual participation for training activities, to the extent possible.



Sectoral and Institutional Context

Lebanese youth are not equipped enough to thrive in a digital economy and may not benefit from the opportunities offered, either online (freelancing, microwork, etc.) or in person in Lebanon (location-based gig work or in person employment). Lebanon's educational curriculum is outdated, and it does little to provide students with the necessary market-relevant digital skills¹. In the digital age, the in-demand market skills are constantly evolving. According to the 2023 Human Capital Index, a child born in Lebanon today will only be 52 percent as productive as she could be had she had complete education and full health, compared to an average of 57 percent in the Middle East². The lack of good quality work experience today undermines future job prospects and lowers future growth potential. Without the right skills sets, youth can become marginalized, disappointed, and frustrated – characteristics which can contribute to social unrest. Such barriers are especially important amongst the refugee population with over half of Syrian children not being able to pursue their primary education due to economic hardships (World Food Programme, 2022).

Digital transformation is reshaping the job market and creating new employment opportunities in the digital economy, particularly for youth in vulnerable areas or refugees with limited local job prospects in Lebanon. Microwork, a component of the global outsourcing industry, exemplifies this trend by deconstructing a service, or the development of a product, into simple, repetitive tasks offering income generating opportunities. Microwork offers an accessible entry point into the digital workforce for low skilled individuals, requiring only basic numeral and literacy skills and a fundamental understanding of Information and Communications Technology (ICT). These tasks enable flexible income opportunities, particularly suitable for marginalized communities or disadvantaged populations. By breaking down large projects into microtasks, even individuals with limited skills, including low-literacy youth, can participate. Examples of microtasks are data entry, geo tagging and verification or transcriptions. Microwork has lower barriers to entry than online freelancing, making it an attractive income-generating opportunity for unemployed and underemployed individuals with few or no specialized skills (S4YE, 2023).

Microwork presents a promising pathway to employment for vulnerable populations, particularly youth and women in developing countries. With over 156 million people globally engaged in such tasks (WB S4YE "Working without borders", 2023), microwork has been shown to significantly increase earnings, with some studies reporting income gains between 40% and 200% (Rockefeller Foundation). Though individual tasks pay modestly, cumulative income often exceeds minimum wage in low and lower middle income countries (WB S4YE "Working without borders", 2023). In Lebanon, the growing demand for specialized microwork, such as Reinforcement Learning from Human Feedback (RLHF), Customer Experience (CX) tasks, sentiment analysis, and fake news detection, aligns with the country's multilingual, educated workforce and its increasing relevance in Arabic and French services (Genesis, Lebanon Market Assessment 2024). For less skilled workers, data collection has emerged as a unique growth area in the microtasking sector that specifically requires basic skills. Microwork represents a flexible, innovative income opportunity and a gateway to regional and global digital jobs.

Even before the October 2019 mass demonstration and the multiple crises that followed, the Syrian refugee crisis has had a significant impact on the local labor market, with youth bearing the brunt. The influx of refugees has resulted in a large increase in labor supply in Lebanon, with negative impacts concentrated in lagging regions – especially in the North and Bekaa – which already faced poor labor market outcomes. Labor market prospects for Lebanese youth have been particularly hard hit, as they are more likely to compete, both sectorally and occupationally, with Syrian refugees in the labor market. A 2013 World Bank report on the analysis of the impact of in the Syrian conflict on Lebanon shows that areas with high refugee influx, which coincide with economically lagging regions have witnessed a sharp unemployment increase among young Lebanese men, from 10 percent in 2010 to 36 percent in 2015. Forty-four percent of Lebanese host community households cited competition for jobs as the biggest factor driving community tensions. Creating more jobs in the economy or improving access to the economic opportunities that exist, is critical for addressing the needs of the population

¹ World Bank. (2021). *Lebanon Education Sector Note: Challenges and Opportunities*. World Bank.

While Lebanon has yet to establish a clear public policy framework for developing digital skills and preparing its citizens for the evolving demands of the future of work, partly due to the ongoing political and insitutional challenges, there is renewed hope with the appointment of a Minister for Information Technology and Artificial Intelligence (AI) in the new government. Before the onset of the October 2019 country wide demonstration, the Ministry of State for Information Technology and Affairs held the agenda of improving the supply and demand side of tech and digital skills. However, following the Government change in January 2020, this state ministry was dissolved with no clear hand-over to another Government entity regarding the digital skilling agenda, though the recent appointment of a Minister of Information Technology and AI offers an opportunity to revive and strengthen this agenda. The lack of public policy leaves Lebanon at a disadvantage when it comes to utilizing the rapid digital transformation that is radically changing the world. While most countries have begun implementing strategies to equip their citizens with digital skills, Lebanon has yet to adopt a comprehensive public plan to address this need. However, recent developments in government provide an opportunity to define a forward looking approach approach.

Relationship to CPF

Better jobs for more people are central to inclusive growth and a pathway out of poverty. The proposed project would aim to provide technical and financial support in two aspects of the jobs agenda including: (i) *generation of productive job opportunities* in microenterprises/self-employment (through productive/economic inclusion pilots, component 2 of this proposed project described below) an agenda the Ministry of Social Affairs is committed to support further through a comprehensive support to social safety net beneficiaries (see next paragraph); and (ii) *increasing inclusive access* to job opportunities by designing and implementing relevant skills development and employment services programs (e.g. digital skilling with the private sector, component 1 of this proposed project described below). Regarding the second aspect, this project will leverage the positive impact and results reached under a previous Bank supported RETF project (Skilling Up Lebanon, P176444[1]) and engagement with private sector entities for digital skilling under an ongoing WB ASA (Skilling Up Mashreq, P169918).

As indicated in the National Social Protection Strategy (NSPS), the Government of Lebanon is keen to implement economic inclusion (EI) programs as part of a comprehensive approach to social protection in Lebanon. This proposed project will aim to, through component 2 on microwork opportunities, implement an EI pilot in non-tradition sector (i.e. digital economy). It will complement an ongoing similar EI RETF pilot (Productive Economic Inclusion in Lebanon, P180905) but implemented in traditional sectors (e.g. agriculture). Both pilots will directly contribute to operationalizing the Government of Lebanon's (GOL) NSPS. Economic Inclusion and Labor Activation is one of the five pillars of the strategy, which outlines the government's vision and approach to providing comprehensive social protection to all Lebanese with a clear connection to employment opportunities as a possible exit strategy. Economic inclusion programs can support poor and vulnerable households to move out of poverty and reduce the government's social assistance caseload sustainably. Findings from the project will inform the government's approach to the economic inclusion of current cash transfer beneficiaries, in both traditional and non-traditional sectors, including identifying the most cost-effective and impactful approach for the country context.

Financing from the Japan Social Development Fund (JSDF) will facilitate an evidence-based approach to introducing economic inclusion in the digital economy in Lebanon (microwork). It will allow for testing different approaches and provide the government with evidence on cost-effectiveness and impact for any eventual scale-up through a World Bank operation. The flexibility of JSDF funding and eligibility to provide the funds directly to NGOs, can help pilot this approach in challenging settings like Lebanon, where conventional employment is scarce and inaccessible to many, but where microwork has the potential to contribute as an effective poverty reduction tool.

[1] Implementation Completion report summarizing the results and impact of the project can be found here: <https://documents1.worldbank.org/curated/en/099091823202581069/pdf/P17644403b456a0f0a07500bdda2dd8a2f.pdf>



C. Development Objective

Development Objective

The objective of the proposed project is to increase access to market-relevant digital skills and income generating activities amongst vulnerable youth in Lebanon.

Key Results

The key outcome indicators to be measured are:

- Number of beneficiaries who completed market-relevant training of which 50% females, 10% refugees and 2% People with Disabilities - baseline: 5,000; endline: 11,000
- Number of beneficiaries who improved their income or found employment of which 50% female, 10% refugees and 2% People with Disabilities - baseline 200; endline: 400
- Number of partnerships established - baseline 7; endline 11

The main beneficiaries of the proposed activities are youth, including refugees, under Component 1; and beneficiaries of social assistance and university graduates from non-tier 1 universities in Lebanon under Component 2. Half of the beneficiaries are expected to be women, therefore the project will ensure it is designed in a gender sensitive manner.

D. Preliminary Description



Activities/Components

To reach the above-objectives, the project will consist of two main components, proposed to each to be established as a separate RETFs with two proposed separate implementing agencies. Component 1, *Digital Skills for Employment*, is proposed to be implemented by Forward MENA for a budget of US\$1,150,000 only financed by the Dutch Prospects'. Component 2, *Productive Inclusion in the Digital Economy or 'Microwork'*, is proposed to be implemented by DOT for a budget of US \$2,720,000, out of which US\$900,000 will be financed by the Dutch Prospects' and US\$ 1,820,000 financed by the Japanese Social Fund for Development (JSDF). A detailed description of the proposed activities are listed below.

Component 1: Digital Skills for Employment (USD\$ 1,150,000 PROSPECTS)

Sub-component 1.1: Scaling up the Nammiskills (NS) platform.

The NS platform (www.nammiskills.org), a joint UNICEF-WB project implemented by Forward MENA (FM), supports youth through their digital learning journey and job search in the tech and creative sectors. The objective of this component is to improve the user experience of the platform and its various features as well as scale up its reach and offerings. It is proposed to be implemented as a RETF by FM. The project is expected to finance the following sets of activities organized in two activities.

Subcomponent 1.1.1: Improve the NS platform's user experience and features: This sub-component will finance the improvement of the innovative features of the platform including: (i) skills assessment; (ii) matching score; (iii) User Interface/User Experience; (iv) Monitoring & Evaluation tracking system, including the automation of some of the tasks (e.g., verifying the course proof of completion). It will also finance the work to ensure the platform fulfils the requirements to become compliant with General Data Protection Regulation (GDPR), strengthen its cybersecurity, and finance part of the management team's costs (other part of the costs are expected to be covered by FM and UNICEF in a complimentary manner, not through co -financing). It will also have to develop a sustainable plan for the platform to become self-financed in the medium to long term.

Subcomponent 1.1.2: Training and certification embedded to the NS platform: This subcomponent will finance the development of new partnerships with training providers (technical and soft skills) to increase the course offerings based on market needs, as well as with online matching platforms to expand the number of employment opportunities (job posts) featured on the platform. Through close engagement with the private sector, e-learning platforms that house online training content, and certification, will be better positioned to offer the most in-demand skills to increase the chances of being placed in a job. It will also finance the cost of training and certification under the NS platform. The platform will analyze the market demand and skills most sought after by employers to offer the most relevant training and in -demand certification valued by employers. The platform will provide training to beneficiaries in an inclusive manner ensuring that youth from various socio-economic backgrounds, gender and across the country are targeted including vulnerable ones.

Sub-component 1.2: Training and certification in partnership with universities

This subcomponent aims to implement digital skills training in universities for the most in-demand digital skills through update or introduction of curricula. It will support two activities: (i) Training of Trainers (ToT) targeting professors at universities; and; (ii) short term digital courses for university students linked to industry certification. Leveraging the international technology partners content will help introducing curriculum change in universities.

Subcomponent 1.2.1 Training of Trainers (ToT) targeting professors at universities will aim at working directly with universities to identify professors who will be trained to offer digital skills training courses to students in a hybrid format (i.e. in-class training coupled with online self-paced). The following programs and partnerships could be leveraged, amongst

o : (i) Amazon Web Services (AWS) Academy Program allows universities to become academy members through trained
t professors (appointed by the university) that qualify to deliver AWS training (including AWS tools, tracking and badges) to
h students, and; (ii) Microsoft Learn for Educators Program enables universities to bring Microsoft Official Curriculum and all
e instructor-led training materials into their classroom to build their students’ technical skills, eligible educators and faculty
r members at universities can access Microsoft ready-to-teach curriculum and teaching
s



materials aligned to industry-recognized Microsoft Certifications. These certifications augment a student's existing degree path and validate the skills needed to be successful across a variety of technical careers.

Subcomponent 1.2.2 Short term digital courses linked to industry certification will aim at designing and implementing short-term training on the digital skills identified as the most in-demand from the employers' side. This activity ultimately aims at increasing youth employment in the digital, tech and creative sector. In the context of the SUL initiative, ongoing discussions are also taking place with additional tech companies that can provide subsidized, short-term digital skills training (3 to 6 months) to students and youth.

Component 2: Productive Inclusion in the Digital Economy or 'Microwork' (US\$2,720,000, out of which US\$900,000 will be financed by the Dutch Prospects' and US\$ 1,820,000 financed by JSDF)

This component aims at increasing the earning opportunities of poor population in Lebanon through microwork opportunities; it will be framed as a Productive Inclusion (PI) program in the digital economy. PI initiatives are typically characterized by various components (five or more), such as transfers, skills training, coaching, market links, and access to financial services to address multiple constraints poor beneficiaries face in increasing their incomes and assets.

This component will target two categories of beneficiaries, to ensure attribution in results for each of the two trust funds: (i) vulnerable youth, first-time job seekers, and graduates from non-Tier 1 universities, facing risks of long-term unemployment (solely financed by the Dutch Prospects) and; (ii) beneficiaries of the social assistance program by the Ministry of Social Affairs (MOSA) under the World Bank-financed Emergency Social Safety Net program (ESSNP) (solely financed by the JSDF). A target of 50 percent of women amongst both category of the beneficiary population is expected to be reached.

Sub-Component 2.1: Assessment of supply and demand

This subcomponent aims to identify gaps and align the skills of the target beneficiaries with the needs of the digital and tech job market through a detailed assessment of both supply (subcomponent 2.1.1) and demand through a market assessment (subcomponent 2.1.2). This will finance the profiling/segmentation of selected university graduates and ESSN beneficiaries and the market assessment analysis to identify the microwork opportunities in regional and international for Lebanese leveraging their competitive advantage. The results of both demand and supply analysis will inform the design of the interventions to address the needs on both sides (worker and employer). The eligibility criteria and selection process of ESSN beneficiaries will be agreed upon with MOSA and detailed in the project operations manual.

Sub-Component 2.2: Implementing the microwork pilot: This subcomponent aims to pilot a microwork program that creates income-generating opportunities for the targeted beneficiaries.

- Sub-Component 2.2.1 Asset Transfer

Subcomponent 2.2.1 will finance the identification and provision of essential tools and resources needed by beneficiaries to access and perform microwork effectively. Diverging from traditional asset transfers such as agricultural inputs, sewing machines, or lump-sum cash grant for establishing or supporting small businesses, it will propose the distribution of tablets or smartphones equipped with internet connectivity. The project will also aim to safeguard against misuse of such assets by restricting the type of activities beneficiaries can perform on them to only those necessary to complete the tasks required. Close monitoring and supervision will also ensure there is no misuse in the asset. Since component 2 partially target specifically ESSN beneficiaries, financing will also be put towards providing access to centers for training, IT equipment and internet connection to address the lack of access to basic equipment to perform the work.

- Sub-Component 2.2.2. Training and support services

Subcomponent 2.2.2 will finance basic digital training covering minimum requirement of basic IT skills (e.g., how to use a computer, how to browse the internet if needed for the task) leveraging existing partnerships with leading tech

c panies for training content and certification and based on the skills gap informed by subcomponent 2.1. The program
o extends beyond skills acquisition, incorporating a mentoring and coaching approach spanning from 10 to 16
m



months including training on how to access clients (i.e. microwork platforms) as a possible exit strategy. In order to build resilience of beneficiaries to external shock, this subcomponent will also finance financial literacy and savings courses to build their capacity in financial management and improve their attitude towards savings.

- Sub-Component 2.2.3 Access to Market and Employment

Subcomponent 2.2.3 will aim to build a strong network of employers to provide project that would offer microwork opportunities to beneficiaries. The market assessment conducted under subcomponent 2.1 will provide a potential list of employers to reach out to and target for business development services. Similar to other PI projects, this microwork initiative facilitates market connections but focused on the digital sector, to benefit young beneficiaries from regional opportunities considering the lack or limited availabilities at the local level.

Sub-Component 2.3: Project Management, Monitoring and Evaluation, Knowledge and Dissemination

This subcomponent aims to ensure effective project coordination, monitoring and track progress, evaluate outcomes, share lessons learned to inform potential scale-up and implement knowledge events.

- Sub-Component 2.3.1 Project Management

Subcomponent 2.3.1 will finance the project management, administration cost and operating costs for the implementing agency. This includes staffing costs for the project team as well as annual financial and technical audits.

- Sub-Component 2.3.2 Monitoring and Evaluation

Subcomponent 2.3.2 will finance monitoring and evaluation (M&E) efforts of project activities, to ensure that implementation is on track and issues are tackled on an ongoing basis. At the same time, findings from monitoring will be used to adjust program design and course-correct, as required, to achieve project objectives. To assess the impact and cost-effectiveness of the proposed pilot in Lebanon, a program evaluation will be conducted and embedded in the design of the pilot.

- Sub-Component 2.3.3. Knowledge Dissemination

The implementing agency will organize knowledge-sharing events to share the findings of the pilot with stakeholders, as well as to consult and engage with relevant government agencies. It is expected that around 20-30 relevant stakeholders will attend each event (i.e., from government, civil society organizations, international community, etc.). In addition, the implementing agency will host knowledge-sharing events in the communities where the pilot was launched to ensure that findings from the pilot are shared with beneficiary communities and that the engagement on economic inclusion continues at the community level.

- Sub-Component 2.3.4. Operating costs

This subcomponent aims to cover essential operational expenses, communication costs, office rent, utilities, and other administrative overheads necessary for the efficient implementation and management of the project.

Environmental and Social Standards Relevance

E. Relevant Standards



ESS Standards	Relevance
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts	Relevant
ESS 10: Stakeholder Engagement and Information Disclosure	Relevant
ESS 2: Labor and Working Conditions	Relevant
ESS 3: Resource Efficiency and Pollution Prevention and Management	Not Currently Relevant
ESS 4: Community Health and Safety	Relevant
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Not Currently Relevant
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Not Currently Relevant
ESS 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not Currently Relevant
ESS 8: Cultural Heritage	Not Currently Relevant
ESS 9: Financial Intermediaries	Not Currently Relevant

Legal Operational Policies		
Safeguard Policies	Triggered?	Explanation (Optional)
Projects on International Waterways OP 7.50	No	
Projects in Disputed Area OP 7.60	No	

Summary of Screening of Environmental and Social Risks and Impacts

The environmental risk is classified as Low, and social risk as Moderate. The proposed project activities will not involve any physical or civil works nor procurement or use of equipment. The environmental risk of the Project is low as its potential adverse risks and impacts on the environment are likely to be minimal or negligible. The project is expected to have positive social impacts such as creation of jobs for vulnerable youth and increasing their skills and employability. The main social risks are associated with a potential exclusion of some vulnerable youth due to social norms such as young women, refugees and internally displaced persons. This risk will be mitigated through eligibility and selection criteria included in the project design and through robust stakeholder engagement strategy. The sexual exploitation and harassment risk (SEA/SH) is assessed as Low due to the nature of the activities. The project will not involve involuntary land acquisition, and the risks of child and forced labor are not expected. To mitigate these social risks, the project will prepare a simplified SEP before appraisal. It is proposed to rely on the national systems for ESS2: Labor and Working Conditions. Any remaining gaps will be addressed in the Environmental and Social Commitment Plan (ESCP). The project is proposed to be implemented by two NGOs whose capacity to implement ESF requirements will be assessed during project preparation.

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