



# Concept Environmental and Social Review Summary

## Concept Stage

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

Date Prepared/Updated: 06/28/2020 | Report No: ESRSC01467



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Comoros	AFRICA	P173114	
Project Name	Comoros Inter-island Connectivity Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Transport	Investment Project Financing	5/20/2021	6/30/2021
Borrower(s)	Implementing Agency(ies)		
Government of the Union of Comoros	Ministry of Transportation, Post, Telecommunications, Communication and Tourism, Société Comorienne des Ports		

Proposed Development Objective(s)

The Project Development Objective is to improve maritime transport connectivity and safety between the islands to support socioeconomic integration.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>40.00</b>

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

No

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

Inter-island connectivity is among the most important constraints to integrate domestic markets and reduce poverty and inequality in Comoros. The Project aims at improving maritime connectivity among the islands and ameliorating maritime transport safety by increasing the port capacity, installing proper infrastructure at secondary ports and strengthening the regulatory and institutional framework to ensure efficient, affordable and safe inter-island transportation.



## 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 Comoros is an archipelago of three major islands, Grand Comores, Moheli and Anjouan, situated off the coast of Mozambique in the Indian Ocean. The proposed project aims to support the improvement in maritime transport connectivity and safety among the islands from both physical and institutional points of view, thereby, connecting people better to markets and contributing to integrating the domestic markets in Comoros.

The proposed project will be National level to cover the three islands in Comoros that will be implemented around the Fomboni area on Moheli island, and in several other coastal areas in Grande Comore and Anjouan islands mainly the Port Fomboni in Moheli and secondary ports Chindini and Ouropveni in Grande Comore, Hoani and Itsamia in Moheli, and Bimbini in Anjouan. These selected sites are in coastal zones without any environmental sensibility. with as main components:

Component 1. Infrastructure improvement of Port Fomboni aims (i) to support rehabilitation of critical infrastructure, in particular the breakwater, and building of additional protection to accommodate Ro-Pax vessels., (ii) to conduct some dredging works, (iii) to build a landing slope to improve berthing (iv) and to install of equipment for navigation aids.

Component 2. Improvement of secondary ports on the three islands on the four major landing sites where kwassa-kwassa boats depart and arrive: Chindini (and Ouropveni), Hoani, Itsamia, and Bimbini. This component will support minimum sheltering improvements, building landing slopes, disposal facilities, and implementing basic navigation aids to assist with approaches and landings.

Component 3. Vessel Renewal Program to encourage transport service operators to renew their vessels with the partial subsidy for vessel renewal to access to the financial market.

Component 4. Implementation support and capacity building (US\$2 million). This component supports the implementing entity for the Project as well as necessary preparatory works, such as detailed design and safeguard documents.

Component 5. Contingent Emergency Response (CERC). This component will facilitate access to rapid financing by allowing reallocation of uncommitted project funds in the event of a natural disaster, either by a formal declaration of a state of emergency or upon a formal request from the Government of Comoros.

Project activities are relevant to ESF for Infrastructure improvement of primary and secondary ports (Component 1) and Maritime safety and Vessel Renewal Program (Component 2) are anticipated to generate : (i) port waste and pollution control, (ii) Ecological impacts of dredged materials, (iii) perturbation of marine habitat and potential damage to marine biotopes during dredged, (iv) occupational health and safety during construction and operations; (v) community health, safety, and security risks, (vi) pollution from the dredged material, and (vii) impacts on fishery and livelihoods for local population during construction. In addition, the vessel renewal program activities are relevant to the ESF related to the decommissioning of old vessels and the acquisition and licensing of new vessels. Technical assistance activities (Component 3) will support the institutional framework and capacity of the Government and relevant ministries, including aspects of E&S risk management. The Contingent Emergency Response Component (CERC) (Component 5) allows for rapid reallocation of project proceeds in the event of a natural or artificial disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact. This CERC component will apply ESF principles to identify E&S risks that may need attention.



D. 2. Borrower’s Institutional Capacity

The Project will be managed by a project implementation unit (PIU) created under the Ministry of Transport (Ministère des Transports Maritime et Aérien, Chargé du Tourisme et de l’Artisanat), which is responsible for implementing all maritime transport policies in Comoros, including port regulations and PPP supervision. Ministry of Transport will be expected to develop and implement an Environmental and Social Management System (ESMS) for operation of the Fomboni Port and the four secondary Ports which includes measures for managing risks and impacts related to the operation phase. However, this entity doesn’t have any capacity to manage the potential environmental and social impacts of the proposed project and is not familiar with Bank safeguard policies and the ESF standards . An international E&S firms will be hired by the Ministry of Transport to prepare the required ESA studies and Resettlement Action plans on the basis of ESA Terms of Reference (TORs) and RAP ToRs approved by the Bank. A detailed E&S capacity and systems assessment vis-a-vis of all E&S standards will be undertaken during preparation following the Bank Guidance Note on Assessing Borrower Capacity at the project level. Corporate oversight will be maintained by the RSA who will approve all safeguards instruments.

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

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

High

**Environmental Risk Rating**

High

The environment risk rating for this proposed project is assessed to be High due to its potential impacts of the rehabilitation on existing Port infrastructure in Fomboni island and secondary Ports in the islands on the marine ecological and potential damage to marine biotopes during dredged; port waste and pollution control, pollution from the dredged material; occupational and community health & safety issues and potential increase in road or traffic-related accidents especially during construction and transportation of dredged material. In fact, the infrastructure improvement in the Fomboni port will likely involve heavy civil works, with noise, vibration, dust, traffic, and possible community safety concerns. Although only limited amounts of dredging may be required, improper management could cause turbidity that could affect marine habitat by turbidity and releasing any environmental contaminants in suspension. During operations of the port and improved landing sites, environmental risks may include storm-water runoff, handling or storage of hazardous cargo and its movement through populated areas, health, safety and security issues in the Port areas. Limited country capacity is a contributing factor to support a substantial rating for environmental risks.

Project activities on the Vessel Renewal Program are expected to have adverse environmental impacts related to scrapping of old vessels and subsidies for the acquisition of new vessels. Risks and impacts related to the decommissioning of old vessels will be further investigated during project preparation, but are likely to include occupational health and safety, management of hazardous materials and management of non-hazardous and hazardous wastes. Subsidies for the acquisition new vessels include risks and impacts related to the operation of those vessels, including the health and safety of the crew and passengers, as well as the management of hazardous materials and marine pollution.

**Social Risk Rating**

Substantial

Public Disclosure



The Social Risk is assessed as “substantial”. Firstly, Components 1 and 2 are focused on infrastructure building and improvement. This is expected to lead to some land acquisition although the extent of land requirements is not clear. This is expected to lead to impacts some resettlement (the scale is not clear at this stage) and other livelihood impacts on local people especially people dependent on coastal resources for livelihoods. This can include fishing, vendors, small services and other livelihoods. Secondly, both Components 1 and 2 will use labor for construction activities. While most of this labor is expected to be drawn from local areas, the influx of labor for civil works cannot be ruled out. This will need to be managed both in terms of working conditions for labor, health and safety of workers, camp management as well as the increased risk of Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) due to labor influx. In the context of COVID-19, mitigation measures would need to be taken for labor and local communities to ensure that disease spread is minimized and appropriate arrangements are in place to manage any incidents. Another potential risk is related to community health and safety during infrastructure construction through increased traffic, movement of machinery and materials etc. The works under Component 2 would need to be managed in a phased manner that allows at least some travel between islands during the period of infrastructure improvement to ensure that access is not restricted completely. Impacts on coastal livelihoods will need to be assessed and minimized to ensure that such people are not adversely impacted during construction and later during the operation phase. Thirdly, under Component 3, the Vessel Improvement Program that includes that allocation of subsidies poses the risk of elite capture unless it is undertaken in a transparent manner with clear criteria. Finally, under Component 5 natural or artificial disaster or crisis could cause major adverse economic and/or social impacts, including increased risk of SEA/SH. This component will apply ESF principles to identify E&S risks that may need attention (stakeholder engagement, OHS, community health and safety, etc.).

## 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:***

ESS1 is assessed as relevant. The Project is likely to generate a wide range of significant adverse risks and impacts on human populations or the environment because of the complex nature of the Project. The Project is likely to have long term, permanent and irreversible impacts due to the nature of its activities.

Following the project design and social and environmental profile on the grounds, the potential risks and impacts are related to the following: (1) weak capacity (human and resources) of the client/project implementation unit to assess and manage environmental and social risks and impacts; (2) land acquisition and resettlement due to temporary physical and economic displacement of persons, vendors and businesses and lost of fisherman livelihoods during construction , (3) poor labor and working conditions and risks related to occupational health and safety due to the size of the civil works; (4) Environmental damage due to improper management of excess material and organic waste from dredging, (5) Community health and safety such as risks related to Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) and spread of infectious diseases, accidents and road safety during construction phase, (6) potential labor influx into the project area during construction owing to opportunistic settlements and migrant workers seeking employment, (7) pollution from the dredged material ; (8) possible impact on cultural heritage mainly on tangible but possibly also intangible sites, (9) perturbation of marine habitat and potential damage to marine biotopes during dredged, and (10) management of construction and hazardous wastes. Other environmental and social risks include elite capture in the Boat Improvement subsidies unless this process is managed in a



transparent and equitable manner. In addition, risks and impacts related to the Vessel Renewal Program are anticipated related to the decommissioning of old vessels and the operation of new vessels.

Vessel licensing requirements to meet relevant requirements under national law and obligations under international law will be investigated during preparation for both freight vessels and small passenger boats to be supported with subsidies under the vessel renewal program. Comoros is a signatory to International Maritime Organization (IMO) conventions and where relevant, all vessels will be expected to be operated consistent with IMO Safety of Life at Sea Convention (SOLAS) and International Convention for the Prevention of Pollution from Ships (MARPOL). A study will be prepared to identify and assess availability of facilities and provide recommendations consistent with the ESSs for decommissioning vessels consistent with ESS objectives.

A standalone ESIA/ESMP for each sub project (in total 5 ESIA with its ESMP) will be prepared prior to appraisal and should be captured in Contractor Environmental and Social Management Plan (C-ESMP) during the construction phases and operational ESMPs. Therefore, the borrower will hire an international consultant firm to prepare the ESIA for the dredging and rehabilitation of Fomboni Port and four standalone ESIA for the secondary port in Chindini (and Ouropveni), Hoani, Itsamia, and Bimbini.

The ESIA for each side will include a social assessment to analyze the impacts on coastal livelihoods and recommend measures for addressing any adverse impacts. These recommendations will be incorporated into ESMPs and implemented as Coastal Livelihood Restoration Plans. Each ESIA will also clearly define mitigation measures for construction and operational phases, roles and responsibilities, time plans, costs and implementation producers for each mitigation measures recommended. The ESIA report will also provide preliminary assessment guidance on managing community health and safety risks related to GBV and COVID-19. The findings of the ESIA, Bank's GBV Risk Assessment Tool and other assessments will guide the identification of GBV risks and the subsequent development of mitigation plans.

The ESMPs will also include Labor Management Plans and a SEA Risk Assessment and Action Plan. Each sub-project under Components 1 and 2 will develop and implement a Resettlement Action Plan (RAP) prior to the commencement of civil works. Construction Contractors will be required, as a condition of their contracts, to implement and comply with the ESMP, including preparing construction Environmental and Social Management Plans that include all necessary specific management plans and procedures provided in the ESMP.

The five ESIA with their respective ESMP and RAPs will be submitted to WB's review before DM review meeting. For Component 3, Vessel Improvement Program, a standalone ESIA will be undertaken to assess the issues and constraints faced by boat operators, especially small boat operators, and recommendations made for their inclusion in the subsidy program. It will also recommend how to ensure transparency, outreach and communication and handle any complaints in the process.

Other documents will also be prepared and disclosed such as the Environmental and Social Commitment Plan and the Stakeholder Engagement Plan including GRM. A Stakeholder Engagement Plan (SEP) will be in place to ensure that stakeholders are meaningfully consulted and their views included in project implementation. The SEP will also outline a Grievance Redress Mechanism.



Ministry of Transport will be expected to develop and implement an environmental and social management system (ESMS) for operation of the Fomboni Port and the four secondary Ports which includes measures for managing risks and impacts related to the operations phase consistent with ISO 14001 and ISO 45001 standards. The ESMS will include a Grievance Redress Mechanism for all stakeholders during the operation phase.

A pre-feasibility study will be conducted during preparation to explore possible public-private partnership (PPP) structuring option for Port Fomboni capex and O&M. The outcome of the study and potential blended finance approach will inform application of OP 4.03 World Bank Group Performance Standards, as appropriate. Due to the small size of Port Fomboni and capex needs, a publicly supported framework may be needed in collaboration with private sector partners which is why the project is proposed to be prepared applying the ESF at this time.

A CERC-ESMF will be prepared to screen and propose mitigation measures related to implementing emergency activities through activating the CERC component.

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

The use of Borrower Framework will not be considered for this project in whole or in part.

**ESS10 Stakeholder Engagement and Information Disclosure**

ESS 10 is assessed as relevant. A Stakeholder Engagement Plan (SEP) will be developed, which will guide the consultation processes and stakeholder engagement throughout the life cycle of the project, starting from preparation down to implementation. During the ESIA exercise, stakeholder mapping will be conducted which will identify stakeholders in the different project intervening zones. Potential stakeholders are Ministry of Transport, boat operators, commercial users of Fomboni port, coastal communities, travelers and service providers for travelers and port operations. Stakeholder mapping will also analyze the influence of these stakeholders to the project design and implementation and the project's impacts on them. Special attention will be given to inclusion of women, vulnerable and project affected people, as well as other interested groups. Based on stakeholder mapping, the Borrower will prepare Stakeholder Engagement Plan (SEP) which will include a detailed schedule of planned engagement activities for the various stakeholders during the project cycle and will specify format and frequency of these engagement. The SEP will ensure all consultations are inclusive and accessible. It will include a Grievance Redress Mechanism. Labor Management Plans will also outline a labor GRM for implementation. The draft of SEP will be prepared and disclosed as early as possible but prior to the project appraisal.

**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**

ESS2 is assessed as relevant. The proposed project will involve direct workers, contracted workers and primary supply workers. A significant number of labor/contracted workers during construction is expected to be employed by the project. In Comoros where migration to overseas to find work is rampant, labor requirements are often supplied from outside the project areas, thus labor camps are anticipated.



Labor Management Procedures (LMPs) will be outlined in the ESIA and a worker specific GRM (for direct and contracted workers) will be established. The LMPs will identify main labor requirements (how different categories of workers will be managed, in accordance with the requirements of national laws and ESS2 and risks associated with the project and determine the resources necessary to address labor issues. The ESIA will also outline prohibited categories of workers such as child and forced/bonded labor.

To ensure Health and Safety (H&S) of workers during the construction and operational phases of the project, the project will require contractors to prepare and implement their Occupational Health & Safety Plan (OHSP) following the World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction activities) and Industry Sector Guidelines for Construction Materials Extraction. The OHSP will also include procedures on incident investigation and reporting, recording and reporting of non-conformance, emergency preparedness and response procedures and on-going worker training/awareness. A SEA/SH Action Plan will also be in place to mitigate and manage work place SEA/SH risks.

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

ESS3 is assessed as relevant. With dredged and rehabilitation of Fomboni Port and the four secondary Ports in the Islands, these activities could generate pollution from the construction materials and disturb the marine habitat and potential damage to marine ecosystem during dredged . The ESIA will include sampling of sediments to determine potential contamination of dredged material with hazardous substances, as well as identify and assess options for disposal of potential hazardous dredge spoils consistent with ESS3.

Construction of temporary worker camps for the construction/rehabilitation of ports are also activities expected to generate pollution. The implementation of mitigation measures such management plans for construction materials will be applied to reduce and minimize the impact of contamination and pollution to marine and terrestrial areas during construction, and residual impacts are expected to be limited in scope and duration.

During construction phase, air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by construction activities. Those most likely to be affected are workers on site and people living within the proximity of the construction sites. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction, and residual impacts are expected to be limited in scope and duration.

Construction activities will generate solid and liquid waste which will primarily include excavated soil and hazardous waste such as hydrocarbon oils from construction machinery and vehicles. The waste generated by the construction works will largely be disposed of at approved sites according with the national laws and regulations.

The site-specific ESIA/ESMPs for Fomboni Port and each secondary Port will manage risks relevant to this standard during preparation, construction, and operational phases.

While greenhouse gas emissions from the project are expected to be not substantial given the rehabilitation nature of the works, GHG emissions will be calculated to meet the requirements of this standard but also corporate commitment.

### **ESS4 Community Health and Safety**





ESS4 is assessed as relevant. During the construction phase, project activities have the potential to expose communities to health and safety risks especially in those communities that are situated immediately close to the Port construction activities. Communities also could be affected by the potential labor influx and GBV/ SEA. The Borrower will assess SEA/GBV risks through the preparation of a SEA/GBV Risk Assessment and will prepare a SEA/GBV Action Plan accordingly. Transportation of dredged materials and vehicle traffics during the civil works will expose communities to health and safety risks from increased traffic during construction. Community access will also be affected. Traffic management plans will be developed and implemented to address these inconveniences and a community outreach strategy will help inform local communities about changes in access. For all the construction work, site-specific ESMPs will require contractors to install a safety system around the project sites (fences and safety guards) during the entire construction period. When works take place on open roads, equipment and vehicles will be brought together to one single well-secured area during the night to ensure both community and worker's safety. A Community Health & Safety Plan will be required from contractors, which will also include procedures on incident investigation and reporting, recording and reporting of non-conformance, emergency preparedness and response procedures and community awareness raising activities. During the operation phase, measures to ensure the health and safety of passengers will be included in the ESMS to be developed for the Ministry of Transport. This will provide guidance on managing boat and passenger safety.

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

Under components 1 and 2, port improvement and construction may require land acquisition and resettlement although the scale of land requirements and expected resettlement is not clear. The pre-feasibility studies will provide a preliminary view on land availability or restrictions on land use around each site (Fomboni port and 4 other smaller ports). Should Resettlement Action Plans (RAPs) be needed, these will be prepared and submitted for World Bank's approval before appraisal. These RAPs will be implemented prior to the commencement of civil works. During the operation phase, under the ESMS, land acquisition and resettlement procedures will be developed for future application by Ministry of Transport.

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

ESS6 is assessed as relevant. The project has the potential to cause adverse impacts on marine and terrestrial biodiversity around each Port site. The project will also result to disturb the marine habitat and potential damage to marine biotopes during dredged.

A marine biodiversity assessment should be conducted , which will inform the preparation of a biodiversity management plan (BMP) if required, either as part of the ESIA or as a standalone document. The BMP will inform the conservation and protection measures. If any site-specific marine biodiversity additional study is needed, this will be ascertained during project preparation and will be included in the ESCP.

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

This ESS7 is not relevant as there are no communities nor peoples who meet the World Bank criteria for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in Comoros.



**ESS8 Cultural Heritage**

ESS8 is assessed as relevant. Based on preliminary information, the sites that could be potentially affected by the projects do not include any cultural heritage. A complete inventory of cultural heritage at the different project sites will be conducted as part of the ESIA's and the mitigation hierarchy will be applied on the management of the project's potential risks and impacts. "Chance Find Procedures" will be included in the ESMP and a chance find clause will be included in works contracts requiring contractors to stop construction if cultural heritage is encountered during construction and to notify and closely coordinate with the relevant mandated Government authority for the salvaging and restoration of such cultural heritage.

**ESS9 Financial Intermediaries**

ESS9 is assessed as not relevant, as there will be no Financial Intermediaries as part of the project.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways**

No

The project will not affect international waters

**OP 7.60 Projects in Disputed Areas**

No

The project is not located in disputed area

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?**

Yes

**Financing Partners**

A Common Approach is not anticipated to be applied at this time. Co-financing with other donors and/or private investors will be explored during preparation. Any potential co-financing arrangement will be reviewed by the Bank during preparation with respect to opportunities for applying the Common Approach.

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

**Actions to be completed prior to Bank Board Approval:**

Documents and actions prepared and completed prior to Appraisal

- Preparation, consultation and disclosure of ESIA's/ESMPs for Fomboni Port and four standalone documents for each secondary Port in Chindini (and Oupoveni), Hoani, Itsamia, and Bimbini , including Marine Biodiversity Assessment and E&S Capacity Assessment with the proposed Institutional arrangement and the Capacity Building Program for Ministry of Transport and project PIU;
- Preparation, consultation and disclosure of Resettlement Action Plans (RAPs) for Fomboni Port and for each of the 4 secondary ports
- Preparation, consultation and disclosure of the Stakeholder Engagement Plan (SEP) including GRM;
- Preparation, consultation and disclosure of Environmental and Social Commitment Plan (ESCP);

Public Disclosure



- Preparation, consultation and disclosure of Labor Management Procedures (LMPs) and Sexual Exploitation and Abuse (SEA)SEA/SH Assessment and Action Plan under ESIA/ESMP
- Preparation of vessel decommissioning study

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

- Consultation and disclosure of the Stakeholder Engagement Plan (SEP) including GRM;
- Consultation and disclosure of Environmental and Social Commitment Plan (ESCP);
- Terms of Reference for ESMS development for Ministry of Transport
- Preparation, consultation and disclosure of CERC-ESMF

**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS**

09-Mar-2021

**IV. CONTACT POINTS**

**World Bank**

Contact:	Atsushi Iimi	Title:	Senior Economist
Telephone No:	+1-202-473-4698	Email:	aiimi@worldbank.org

**Borrower/Client/Recipient**

Borrower: Government of the Union of Comoros

**Implementing Agency(ies)**

Implementing Agency: Ministry of Transportation, Post, Telecommunications, Communication and Tourism

Implementing Agency: Société Comorienne des Ports

**V. FOR MORE INFORMATION CONTACT**

The World Bank  
 1818 H Street, NW  
 Washington, D.C. 20433  
 Telephone: (202) 473-1000  
 Web: <http://www.worldbank.org/projects>

**VI. APPROVAL**

Task Team Leader(s):	Atsushi Iimi
Practice Manager (ENR/Social)	Nathalie Munzberg Recommended on 28-Jun-2020 at 15:09:11 EDT

Public Disclosure



Safeguards Advisor ESSA

Nathalie S. Munzberg (SAESSA) Cleared on 28-Jun-2020 at 15:45:26 EDT

Public Disclosure