INTEGRATED SAFEGUARDS DATA SHEET APPRAISAL STAGE

Report No.: ISDSA12309

Date ISDS Prepared/Updated: 15-Apr-2015

Date ISDS Approved/Disclosed: 16-Apr-2015

I. BASIC INFORMATION

1. Basic Project Data

Country:	Pakis	tan	Project ID:	P13132	P131324		
Project Name:	PK-Sindh Barrages Improvement Project (P131324)						
Task Team	Abdulhamid Azad						
Leader(s):							
Estimated	08-Aj	pr-2015	Estimated	22-Jun-	2015		
Appraisal Date:			Board Date	:			
Managing Unit:	GWA	DR	Lending Instrument:	Investm	Investment Project Financing		
Sector(s):	General water, sanitation and flood protection sector (70%), Irrigation and drainage (30%)						
Theme(s):	Water resource management (60%), Rural services and infrastructure (20%), Income Support for Old Age, Disability & Survivorship (10%), Climate change (5%), Other environment and natural resources management (5%)						
Is this project p	cocess	ed under OP 8.50 (Em	nergency Reco	overy) or	OP	No	
8.00 (Rapid Res	8.00 (Rapid Response to Crises and Emergencies)?						
Financing (In U	Financing (In USD Million)						
Total Project Cos	st: 209.00 Total Bank Financing: 191.00						
Financing Gap:		0.00					
Financing Sou	Financing Source Amount						
BORROWER/F	BORROWER/RECIPIENT 18.00					18.00	
International Development Association (IDA) 191.00							
Total 209.00							
Environmental	A - Fi	ull Assessment	•				
Category:							
Is this a	No						
Repeater							
project?							

2. Project Development Objective(s)

The PDO is to strengthen the Irrigation Department's capacity to effectively rehabilitate, operate and manage the Guddu barrage.

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3. Project Description

The primary function of the gated Guddu barrage is to provide irrigation water to over one million hectares of agricultural lands in the Jacobabad, Larkana , Sukkur and the Naseerabad districts , by feeding the Ghotki Feeder and Rainee canals on the left (east) side and the Begari Sindh (BS) Feeder and Desert Pat Feeder canals on the right (west) side. The barrage incorporates two fish ladders. The barrage is also used for river control and flood management. It has been designed to pass a superflood discharge of up to 33,980 cubic meters per seconds (m3/sec). The barrage is also an important transport link across the River Indus and provides cooling water for the thermal power station at Guddu. Two major gas lines cross the barrage. The barrage was commissioned in 1962 and has now seen over fifty years of active service. The Guddu barrage has a span of 1,400 meters. It consists of 64 gates of 18 meters each and one navigation lock with a span of 15 meters. The gates weighing 55 to 100 tons are "fixed wheel" type and operate without counterweights. The project has the following three components:

Component A: Rehabilitation of the Guddu Barrage (US\$196 million) This component will support rehabilitation of the barrage and its associated structures. The works have been determined based on (a) a detailed diagnostic assessment, (b) hydrological and sediment analysis studies including physical and numerical model studies, and (c) geotechnical, structural, and safety evaluation studies. Implementation of the environmental and social plan (US\$6 million) is part of this component.

Component B: Improved Barrage Operation (US\$8 million): This component will support modernization and improvements to the barrage O&M. This will include necessary upgrades to the instrument monitoring systems such as piezometers and gate positioning and water measurement equipment (acoustic Doppler current profilers), replacement of surveillance and maintenance boats, and procurement of hydrographic equipment. The project will provide new covered workshops and a stock of spare parts for maintenance activities. The instrument monitoring system for the barrage will be renovated and the operating staff will be equipped with an upgraded operation, maintenance, and surveillance manual.

Component C: Project Management, Monitoring, and Evaluation (US\$5 million): This component will support the coordination of all project-related activities as well as training and technical assistance in procurement, financial, social and environmental safeguards, and communication. Activities will include the establishment of an independent panel of experts (POE) to review, monitor, evaluate, and help guide the rehabilitation process with regard to the safety of the barrage. The component will also support implementation of an information dissemination and communication program, particularly regarding possible canal closures, citizens' engagement and feedback, and the implementation of safeguard-related action plans.

4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

Guddu barrage is located at longitude 69.71' E and latitude 27.42' N across the River Indus some 16 km from Kashmore, 130 km from Rahimyar Khan, 190 km from Sukkur, and 630 km from Karachi. The Barrage is accessible by paved road from all these cities. The nearest airports to the barrage are Rahimyar Khan and Sukkur. The Guddu barrage provides only way of crossing the river for some considerable distance. The nearest river crossings on upstream is located about 230 km at DG Khan and downstream crossing is located about 190 km at Sukkur. Based on the traffic counts carried out in October 2011, the average daily traffic on the barrage is 3260, in which 40 percent are heavy vehicles. Peak hourly traffic is 225 vehicles per hour.

The project area is dominated by characteristics of braided Indus river (meandering channels, temporary shoals and alluvial sand tracts), barrage pondage and floodplain agriculture. Indus upstream of Guddu is extensively braided with a width of 10 to 15 km with constantly shifting channels. The river carries water through its entire width during high flow season of June to September, while the water will be limited to few channels during remaining months. The barrage and its river training works narrowed the river at the barrage by 1.3 km and created a temporary pondage area on the upstream side during high flows and some permanent ponds near the spurs. Before construction of the Guddu barrage, the area is a desolated terrain with some agriculture in the floodplains, but the barrage transformed these barren lands in to vast agricultural tracts. Landuse in the project impact area is covered 35 percent by Indus (10% by active channels, 15% by river alluvium, 5% by stagnant water bodies, 5% by riverine scrublands), 60 percent by agriculture.

The project location is surrounded by cultivated land. Soil types range from dark brown sandy loam in most places to light-brown sand in others. The area's soils contain adequate moisture and nutrients for agricultural use. The soils at the barrage site are alluvial in nature and are mainly silty clay, clay loam, and loam soils.

The Indus at Guddu drains an area of about 950,000 km2 and generates a mean annual discharge of 6,682 cumec. The hydrograph of the river is strongly seasonal with a long low water season between October and May (low flow season) and a high water season between June and September (high flow season) – driven primarily by summer snowmelt in the upper catchment and monsoon rainfall. River flow upstream of Guddu barrage varies from a monthly average flow of approximately 10,300 cumec in August, to a monthly average flow of approximately 990 cumec in December. The corresponding figures downstream of barrage are approximately 9,500 cumec (335,000 cusec) and 708 cumec (25,000 cusec) in August and December respectively.

About 15,000 cumec of water is being diverted through four canals of Guddu (509 cumec through Beghari Sindh Feeder; 396 through Desert Feeder; 311 through Ghotki Feeder and 283 cumec through Rainee canal).

A 170 km stretch of the River Indus between two irrigation barrages Guddu and Sukkur is the designated as national protected area for Indus dolphin, and is known as Indus Dolphin Game Reserve . The total area of the reserve is 125,000 ha and has a 3 km buffer zone on the floodplains. This dolphin game reserve was also declared as Ramsar wetland of International Importance in year 2000. According to recent estimates in 2011, the reserve holds a population of 918 dolphins. Whereas in 1975, only 150 dolphins were recorded from this reserve signifying the conservation efforts carried out so far.

5. Environmental and Social Safeguards Specialists

Javaid Afzal (GENDR)

Miki Terasawa (GSURR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental	Yes	The proposed project involves civil and mechanical
Assessment OP/BP 4.01		rehabilitation works of the existing barrage, which is
		located on Indus river. The impact of the project will be
		site specific and will be mainly associated with the
		construction phase. An independent EIA has been
		undertaken during project preparation. Besides, The

		project will has developed an emergency preparedness plan, a social development action plan and an environmental management plan.
Natural Habitats OP/BP 4.04	Yes	The project may impact on flora and fauna: the Indus River between the Guddu and Sukkur barrages is an important game reserve and habitat for the Indus or Blind Dolphin (Platanista gangetica minor). This part of the river contains large population of dolphins. During the implementation, the project will assess the performance of the fish ladder and propose improvements or alternatives based on best global practices available technologies if possible. The ESIA reports has recommended a study on dolphin conservation action plan and will be awarded soon after the project is approved by the Bank.
Forests OP/BP 4.36	No	The project does not impact riverine forests as all the activities are confined within the river main course. It is expected that around 260 trees mainly eucalyptus and acacia may need to be fell down mainly for the construction of office cum residential colony.
Pest Management OP 4.09	No	There will be no change in the irrigation supplies from the barrage after the rehabilitation works have been completed and therefore there will be no change in the existing pesticide use practices in the irrigation command.
Physical Cultural Resources OP/BP 4.11	No	The rehabilitation works are limited to the existing structure with no new activities.
Indigenous Peoples OP/ BP 4.10	No	There are no known indigenous groups in Sindh province as identified under this policy. The only identified indigenous people in Pakistan under the OP/BP 4.10 are in Kalash valley in the northern Pakistan (Chitral district of Khyber Pakhtunkhwa province).
Involuntary Resettlement OP/BP 4.12	Yes	While no land acquisition or resettlement is expected at this time, this has been triggered as a precautionary measure. The staff colony would be established on land owned by the Irrigation Department. The RPF is prepared to guide resettlement planning for any unanticipated land acquisition and resettlement impacts during the course of the project implementation.
Safety of Dams OP/BP 4.37	Yes	Although barrages are not dams, they are indeed major hydraulic structures on which millions of hectares of irrigated land and population are dependent. A panel of expert has been established and they will continue during the implementation period. An emergency preparedness plan has been prepared as well as an updated barrage operational plan.
Projects on International Waterways OP/BP 7.50	Yes	The project area is located on the Indus River which is an international waterway. However, the project essentially

		involves rehabilitation of existing barrage facilities. It
		does not involve works and activities that would exceed
		the original scheme, change its nature, or alter or expand
		its scope and extent to make it appear a new or different
		scheme. Therefore given the nature of works envisaged
		under the proposed project: (a) the project will not
		adversely affect the quality or quantity of water flows to
		other riparians; and (b) it will not be adversely affected by
		other riparians' water use. The project team has also
		reviewed Article VI1 of the Indus Waters Treaty between
		India and Pakistan and concluded that a notification by
		Pakistan to India under paragraph (2) of the said Article
		VI1 is not required, as the project will not cause
		interference with the waters of any of the Rivers and will
		not affect the other riparians materially. Therefore, the
		Project falls within the exception to the notification
		requirements of OP 7.50, set forth in paragraph 7(a) of OP
		7.50. The RVP has approved such an exception.
Projects in Disputed	No	The project is located within Sindh province of Pakistan.
Areas OP/BP 7.60		The province is not a disputed area.
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II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

Accord of 1991.

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

Guddu barrage has been in operation for more than 50 years and the proposed rehabilitation works will not alter the current operational regime of the barrage and hence will not create any additional impacts. The proposed activities are limited to the existing footprints of the barrage and no additional land acquisition is required, hence most of the impacts from the proposed activities are temporary in nature and limited to construction period. Based on the experience of rehabilitation of other barrage projects in Pakistan, many of the environmental issues are mainstreamed in the project design (e.g. construction using bulkhead gates). Dolphin game reserve located immediately downstream of the barrage is the most significant receptor susceptible from impacts of the construction works. The overall positive impact of the project, which is the enhancement of the life of the barrage to safeguard the livelihoods of 2.6 million people in the command area through provision of irrigated water for 1.2 million ha, will be experienced countrywide. Construction of barrages on the Indus River has resulted in fragmentation of dolphin habitat as well as other fish species, particularly Hilsa. Besides, diversion of water for irrigation has also resulted in reduction of historical environmental flows below Kotri barrage. This project has allocated significant resources to undertake dolphin conservation management and Hilsa migration impact assessment studies, which will be completed during the implementation of the project. Recommendations will be presented to the concerned Government departments for implementation. A number of studies in the past have been conducted to determine the quantum of environmental flows for healthy river system including aquatic life as well as to avoid sea intrusion. Government is implementing recommendations according to the Water Apportionment

Changes in water quality, under-water noise with potential impact on dolphins and other river

habitat, impact of longer than scheduled canal closures on crop yields and other water needs are some key environmental issues. Traffic, air quality, potential collision of dolphin with construction vehicles, clearing of natural vegetation and trees and higher noise levels are some other potential issues envisaged in the project and are associated with construction stage of the project.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

According to GoS development plans, rehabilitation of Sukkur and Guddu barrages are considered as major developments in Indus in next 20 years. The construction of three barrages in Sindh has been diverting about 3,920 cumec to the canals and resulted in irrigation of 5,572,995 ha of land. The construction of a series of barrages on the Indus River system has a cumulative impact of increased irrigation, which brought the green revolution in this region of the world, and increased the economy many fold. The current conditions of all barrages require urgent action to rehabilitate them in order to improve the efficiency and effectiveness of irrigation water distribution in rural Sindh. The rehabilitation work under the project will safeguard the continued operation of Guddu barrage by prolonging the useful life of the structure, and continue uninterrupted water supply to the irrigation network of Sindh. However, dolphin habitat and blockage to fish migration upstream particularly Hilsa are some of the major environmental issues resulting directly from the construction of barrages in decades between 30-60s. Rehabilitation of these barrages will not result in any additional environmental impacts than what has already been noticed.

The project will ensure safeguarding the livelihoods of 2.6 million people in the barrage command area, besides ensuring a number of other environmental and social co-benefits. The project is expected to provide positive social impact by maintaining reliable supply of water to more than 370,000 farm households and reducing communities' vulnerability against barrage failure.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

No intervention. Failure of the Guddu Barrage can cause widespread flooding and interruption of water supplies, resulting in a disastrous setback to the economy and the lives of the people in the area. Thus, 'no intervention' is not an option. The alternative of carrying out the repairs through intensive maintenance during regular closure periods was considered and not found viable. To carry out proper repairs, the drying of the construction surfaces is necessary, requiring the construction of coffer dams.

Seven alternatives were studied for improved flood protection. Alternative 1 includes the raising and strengthening of existing river training works to withstand a 100 year return flood. Alternatives 2, 3, 4 cover various methods of discharging floodwaters through left marginal bund by allowing controlled breaches, but all these alternatives are rejected due to requirement of inundation of large areas of agricultural lands and settlements. Alternative 5 includes construction of an underground siphon through left bank to divert water from upstream to downstream, which is a technically challenging and expensive. Alternative 6 and 7 include construction of new marginal bunds and widening of existing barrage through construction of new gates. An overview of all these alternatives are described below

1. Strengthen & Raise Existing River Training Works to Contain 100 Year Flood flows: Existing river training works will be strengthened and the existing marginal bunds shall be raised to 6ft above the modelled 100 year flood levels. Stone pitching would be added to the river side to protect the bunds from scour during flood flows. No land acquisition is required for this option.

2. Earth Fuse Bund on Left Marginal Bund: A sacrificial section for the weaker section of left marginal bund is proposed. The section would be designed to breach causing the flood level

upstream of the barrage to reduce, thus reducing the need to raise the existing marginal bunds. This option is cheaper but the downstream of the fuse bund must be maintained clear of all settlements or be evacuated prior to a breach and the area likely to be flooded would be large.

3. Fixed Weir on Left Marginal Bund: This option works in a similar manner to the earth fuse bund; however, instead of the construction of a sacrificial portion of bund which requires reconstruction following a breach, the crest level of this section of the bund is lowered and a concrete weir crest is constructed. The area likely to be flooded would be larger than above option, but there would be no need for reconstruction of the structure following a breach.

4. Gated Weir on Left Marginal Bund: This option is same as above, except that the crest level of the weir can be reduced by adding gates to the weir. Similar to above two options, this option also requires maintaining large areas to be flooded during floods.

5. Siphon under left bank Canals: Additional capacity to pass water from upstream of the barrage to downstream could be provided by constructing a large concrete siphon (culvert) which passes under the Rainee and Ghotki Canals on the left bank of the barrage. The capital cost of the structure would be far outstripping the existing budget. Maintenance costs on the siphon shall also be high, but will ensure that the siphon can operate at the time of need. It is a long term solution to flooding in the area. Moreover, the flood water of siphon when diverted to river downstream of barrage would add flood pressure to Sukkur barrage.

6. Construct New Marginal Bunds: In this option, construction of new marginal bunds was considered instead of rehabilitation of the existing bunds. However this option was rejected because the existing marginal bunds are technically suitable for rehabilitation.

7. Extend Barrage on Left Bank: This is achieved by providing additional gate bays on the left bank of the barrage. This option would require reconstruction of the left guide bund and the head regulators of the left bank canals. A diversion for these canals would also be required during construction. Major interventions would also be required to manage the alignment of the river approach to satisfy the upstream river morphology and extensive modelling studies would be required. The construction period and costs will be very high. Large scale land acquisition is required along the left bank.

Environmentally and socially the alternative 1 is preferable compared to other options due to (i) no loss of terrestrial habitat (clearing of natural vegetation and trees) and aquatic habitat (development of additional pondage area) due to additional land acquisition and construction works (ii) lesser requirement of quarry and borrow materials due to lesser construction works, (iii) lesser construction related environmental impacts from construction equipment and vehicles and construction workforce.

Several options have been considered for the rehabilitation of the barrage regulator control system. In considering these options, the feasibility took into account the importance of maintaining power operations, number and skill level of barrage staff and the unlikelihood that future expenditure on maintenance will be significantly increased. Analysis shows that the option to rehabilitate barrage using instrumentation and control similar to the existing arrangement (compared to centralized control or remote control options) provides the most reliable and most flexible solution. This is because it will accommodate multiple failures and still allow powered operation of gates. The existing motor drive trolleys can be replaced by an appropriate number of new trolleys with the design updated to include modern control and braking as well as ancillaries such as task lighting. It would also be possible, if required, that one or more trolleys be powered by a small petrol engine making operation without electricity possible although it is also envisaged that a permanent standby generator would be available, so to an extent, this would be a double redundancy. The option of using instruments and control system similar to the existing arrangement is the least cost option due to the smaller number of motors and associated equipment required.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

The Sindh Irrigation and Drainage Authority and the Irrigation Department has been successfully implementing the on-going Sindh Water Sector Improvement Project (WSIP), which is also a category A project. WSIP has an established environment and social unit, and safeguard compliance has been satisfactory. The Project Monitoring Cell of WSIP facilitated preparation of ESMP, RPF, and other required documents with support from a consultant and also facilitated independent environment and social assessment. Their capacity and experiences will support the established environment and social unit for the proposed project, which is responsible for project preparation and implementation. In ensuring safeguard compliance, the Project Management Office of the Irrigation Department will also be supported by construction supervision consultant and independent monitoring and evaluation consultant.

The PMO will be responsible for the implementation of ESMP. The PMO would be responsible for all aspects of project implementation including technical, operational, financial management, and overseeing the implementation of ESMP. The PMO will include an Environmental and Social Unit (ESU) consisting of the following staff

- Environmental specialist,
- Social development specialist
- Communication Specialist

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

Extensive consultations were carried out during the project preparation. Initial consultations were held at the early stages of the project preparation (November 2011 to Jan 2012) to share the project objectives and terms of references of the proposed ESIA study. Second round of consultations were held during October to December 2013 to disclose the results of ESIA. Consultations involved multiple methods – for example, household level interviews, village wise meetings, focus group discussions and workshops. A medical camp for women in the project area was also organized to promote awareness on the project. Stakeholders consulted include (i) population around the project area and community representatives. (ii) farmers in the command area of Guddu barrage, (iii) industrial users of the canals, such as Guddu thermal power plant, (iv) district and provincial government authorities responsible for district administration, roads, forest, rural development, agriculture, fisheries, wildlife and environmental protection, (v) community based organizations and (vi) conservation agencies such as IUCN and WWF.

The ESA was submitted to Sindh-EPA, which cleared the report on February 17, 2015. A final round of consultation and disclosure of the ESA reports was carried out during October 2014. These meetings were held in Guddu and Sukkur, at which respective relevant district organizations and institutes were invited. The consultation meetings were also attended by local community, SID officials, media, civil society representatives. The ESA summary has been translated into Sindhi. The Summary (both English and Sindhi) and the ESA document were uploaded on the website of SID on 10 November 2014 and disclosed at the InfoShop on January 08, 2015.

Key stakeholders include Sindh Irrigation Department, Sindh Environment Protection Agency, Wildlife Department, District Administrations, communities in project areas and command areas, private sector, and NGOs. Detailed consultations were held with community members, including fishermen, farmers, and women. Consultations were also held at district and provincial levels in finalizing the Independent Environment and Social Assessment. The project prepared communication strategy as a part of Social Management Framework. This includes continued consultations during the project implementation, in particular with community members who could be affected by the project works.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other				
Date of receipt by the Bank12-Jan-2015				
Date of submission to InfoShop 12-Jan-2015				
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	12-Jan-2015			
"In country" Disclosure				
Pakistan 12-Jan-2015				
Comments:				
Resettlement Action Plan/Framework/Policy Process				
Date of receipt by the Bank	07-Jan-2015			
Date of submission to InfoShop 08-Jan-2015				
"In country" Disclosure				
Pakistan	12-Jan-2015			
Comments:				
If the project triggers the Pest Management and/or Physical Cultural Resources policies, the				

respective issues are to be addressed and disclosed as part of the Environmental Assessment/ Audit/or EMP.

If in-country disclosure of any of the above documents is not expected, please explain why:

C. Compliance Monitoring Indicators at the Corporate Level

OP/BP/GP 4.01 - Environment Assessment					
Does the project require a stand-alone EA (including EMP) report?	Yes [×]	No []	NA []
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	Yes [×]	No []	NA []
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [×]	No []	NA []
OP/BP 4.04 - Natural Habitats					
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes [×]	No []	NA []
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	Yes [×]	No []	NA []
OP/BP 4.12 - Involuntary Resettlement					
Has a resettlement plan/abbreviated plan/policy framework/ process framework (as appropriate) been prepared?	Yes [×]	No []	NA []
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [×]	No []	NA []

OP/BP 4.37 - Safety of Dams			
Have dam safety plans been prepared?	Yes [×]	No []	NA []
Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?	Yes [×]	No []	NA []
Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?	Yes [×]	No []	NA []
OP 7.50 - Projects on International Waterways			
Have the other riparians been notified of the project?	Yes []	No [×]	NA []
If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?	Yes [×]	No []	NA []
Has the RVP approved such an exception?	Yes [\times]	No []	NA []
The World Bank Policy on Disclosure of Information			
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [×]	No []	NA []
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [×]	No []	NA []
All Safeguard Policies			
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [×]	No []	NA []
Have costs related to safeguard policy measures been included in the project cost?	Yes [×]	No []	NA []
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [×]	No []	NA []
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [×]	No []	NA []

III. APPROVALS

Task Team Leader(s):	Name: Abdulhamid Azad				
Approved By					
Safeguards Advisor:	Name: Francis V. Fragano (SA)	Date: 15-Apr-2015			
Practice Manager/ Manager:	Name: Christina Leb (PMGR)	Date: 16-Apr-2015			