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Project Information Document/ Integrated Safeguards Data Sheet (PID/ISDS)

Concept Stage | Date Prepared/Updated: 09-Dec-2016 | Report No: PIDISDSC19629

BASIC INFORMATION

A. Basic Project Data

Country	Project ID	Parent Project ID (if any)	Project Name
Cambodia	P160929		Cambodia Southeast Asia Disaster Risk Management Project (P160929)
Region	**Estimated Appraisal Date**	**Estimated Board Date**	**Practice Area (Lead)**
EAST ASIA AND PACIFIC	Dec 15, 2016	Apr 06, 2017	Social, Urban, Rural and Resilience Global Practice
Lending Instrument	**Borrower(s)**	**Implementing Agency**	
Investment Project Financing	The Kingdom of Cambodia	Ministry of Economy and Finance,Ministry of Rural Development	

Proposed Development Objective(s)

The Project Development Objective (PDO) for the Southeast Asia Disaster Risk Management program is to reduce the impacts of natural hazards – in Cambodia this will entail improving climate resilient rural road connectivity in select provinces and providing immediate and effective response to an Eligible Crisis or Emergency.

Financing (in USD Million)

Financing Source	Amount
Borrower	13.00
Global Facility for Disaster Reduction and Recovery	1.00
International Development Association (IDA)	60.00
Total Project Cost	**74.00**

Environmental Assessment Category	Concept Review Decision
B-Partial Assessment	Track II-The review did authorize the preparation to continue

Other Decision (as needed)

PLEASE NOTE: The PCN and ISDS for Southeast Asia Disaster Risk Management Project (P149149) were approved on November 06, 2015, by the East Asia and Pacific Regional Safeguards Coordinator and the GSU08 Practice Manager as part of the regional covering Cambodia, Lao PDR, and Myanmar. The project has since then been divided into three

separate country PCodes. Per CMU guidance, without conducting additional Project Concept Note (PCN) reviews, three separate projects are being prepared. Per RSS guidance, this concept stage ISDS focuses on the Cambodia Southeast Asia Disaster Risk Management Project.

B. Introduction and Context

Country Context

1. **Following more than two decades of strong economic growth, Cambodia has attained the lower-middle income status as of 2015, with Gross National Income (GNI) per capita reaching US$1,070.** Cambodia grew by an average annual rate per capita of 7.8 percent during 2004 and 2014, ranking among the top 15 economies in the world in terms of economic growth. The GNI per capita increased by more than threefold in just two decades. The main drivers of growth have been garment, manufacturing, agriculture, tourism and, more recently, construction. Between 2004 and 2013, the poverty incidence under the national poverty line declined from 50.2 percent to 10.1 percent of the population. Despite this progress, the vast majority of the families that rose above the poverty line did so by a small margin, leaving them at risk in the event of an adverse shock. Poverty reduction in Cambodia has been accompanied by shared prosperity—the real consumption growth of the bottom 40 percent of the distribution was larger than that of the top 60 percent—and a decrease in inequality, with the Gini coefficient going down from 0.372 to 0.258 between 2007 and 2013.[1]

2. **Cambodia is predominantly a rural, subsistence economy, with 79 percent of the population living in rural areas, where limited connectivity and repeated disasters lead to barriers in development.**[2] A vast amount of Cambodia's productive resources – labor, land, and natural resources – are located in rural areas and are still unused or underutilized. Tapping into these resources and drawing them into productive uses is critical to unlocking sustainable, broad-based economic growth and development. Agricultural employment constitutes 51 percent of the total labor force, and agricultural gross domestic product (GDP) represents 25.6 percent of the total GDP, so that agricultural growth will be critical for continued poverty reduction.[3] Upgrading rural roads and improving the logistics chains between farms, markets and basic services will help reduce the poverty rate in rural areas where 91 percent of the poor live.[4]

3. **Disasters in Cambodia drain government resources.** The 2016 World Risk Index ranks Cambodia the ninth most disaster prone country in the world.[5] Floods, storms and droughts are the most prevalent hazards in the country, which are expected to become more pronounced and severe under the influence of climate change.[6] Typhoon Ketsana in 2009, the floods in 2011 and floods in 2014 caused damages and losses of US$132 million, US$625 million, and US$357 million respectively. The El Niño climatic pattern also impacts Cambodia, bringing severe drought to the country in 2015-2016, impacting sectors dependent on water resources. A preliminary financial risk assessment[7] estimated high annual

[1] World Bank. Forthcoming. *Cambodia Systematic Country Diagnostic,* Washington, DC.
[2] World Bank. 2016. World Bank Country Data website: Rural Population data (2015).
[3] World Bank. 2015. *Cambodian Agriculture in Transition: Opportunities and Risks*.
[4] World Bank. 2013. *Where Have All the Poor Gone? Cambodia Poverty Assessment*.
[5] World Risk Report, 2016. http://weltrisikobericht.de/english/.
[6] World Bank. 2016. *Climate Change Knowledge Portal*. *Cambodia. Risk Screening Overview*. Accessed September 2016.
[7] World Bank / Global Facility for Disaster Reduction and Recovery. 2012. *ASEAN. Advancing Disaster Risk Financing and Insurance in ASEAN Member States: Framework and Options for Implementation*. The annual expected fiscal burden for the RGC due to natural disasters is estimated at 0.5 percent of total public expenditure. In the event of a 200-year disaster, Cambodia could face bills totaling 18 percent or more of total public expenditure

economic losses for Cambodia due to natural disasters equivalent to 0.9 percent of GDP.[8] An analysis based on historical data indicates that every year Cambodia faces average costs from floods for emergency response alone of US$54 million.

4. **The high reconstruction costs in the transport sector and the lack of short-term liquidity of to finance disaster response and relief are undermining economic progress.** The transport sector is the most vulnerable sector of the economy. It was the hardest hit, accounting for 41 percent of total economic losses, in the last three main events in 2009, 2013, and 2014 with a cost of US$454 million to the country.[9] The integration of risk management solutions into public investment planning, in particular the transport sector, is needed to reduce the costs of disasters. At the same time, appropriate disaster response financing instruments, which help the government to quickly respond to a disaster, are lacking. These instruments are needed, for example, to finance social protection in post-disaster situations to avoid people falling back into poverty. Household income loss from the 2013 floods added up to about US$36.6 million, around 18 percent of total losses, and burdened the poor and vulnerable the most.

Sectoral and Institutional Context

5. **Southeast Asia is highly exposed to natural disaster impacts underlining the importance of mainstreaming risk reduction into development and strengthening the region's capacity and cooperation in the field of disaster risk management (DRM).** To contribute to the resilient and sustainable development of the region, the World Bank is assisting Cambodia, Lao PDR, and Myanmar through a series of interdependent DRM projects. This series of projects seeks to reduce the vulnerability of people and assets to natural hazards in selected areas through an integrated package of structural and non-structural investments. Targeting beneficiaries who are facing a common set of development issues, the series represents a new phase of DRM engagement in the region. It will strengthen the respective ministries of finance and economic planning as well as line ministries to support systematic and long-term investments in resilience. The regional approach combines investments and activities at the country level and activities at the regional level. Under this approach, the Southeast Asian countries will benefit from regional approaches prioritized investments in resilience and retrofitting of key-public assets to meet international recognized resilience standards. The projects will also strengthen post disaster response capacity and financial protection through national and regional financial instruments (see Annex 6).

6. **Recognizing the links between development, sustainability and resilience, Cambodia has started to incorporate disaster and climate resilience priorities into its national strategies but the implementation remains a challenge.** The National Action Plan for Disaster Risk Reduction 2014-2018[10] sets out the Government's priority to "build a resilient nation and local communities to pursue sustainable development". The plan and Law on Disaster Management[11] outline the main responsibilities of the National Committee for Disaster Management (NCDM) in coordinating disaster preparedness and response. Yet, weak capacity, lacking resources, insufficient analytics and a focus on disaster response hamper the implementation of these plans. Mainstreaming of resilient principles across

[8] World Bank / Global Facility for Disaster Reduction and Recovery. 2012. *ASEAN. Advancing Disaster Risk Financing and Insurance in ASEAN Member States: Framework and Options for Implementation*.
[9] Royal Government of Cambodia. 2014. *Cambodia Post-Flood Early Recovery Needs Assessment Report.*
[10] Royal Government of Cambodia. 2014. Cambodia National Action Plan for Disaster Risk Reduction, 2014-18.
[11] Royal Government of Cambodia. 2015. Law on Disaster Management. NS/RKM/0715/007.

sectors is not systematized but rather conducted in an ad-hoc manner, constrained by technical knowledge and budget allocations for DRM.

7. **The role of the Ministry of Economy and Financing (MEF) in DRM is still limited, but global experience suggests that high-level Government agencies need to play a critical role in increasing resilience.** MEF's contribution and leadership is currently marginal in critical areas such as convening line ministries, creating DRM awareness, prioritizing strategic risk reduction investments, allocating necessary resources for DRM, and promoting disaster risk finance tools to secure access to immediate funding for disaster response and recovery. In particular, two areas require increased capacity-building to tackle the increasing disaster and climate risks: (i) mainstreaming resilience into investment planning, and (ii) strengthening disaster risk financing.

8. **Mainstreaming resilience into investment planning is critical to ensure the country's assets and services develop in a safe, resilient and sustainable way so that they can bring the desired benefits to its peoples**. There is need for the ongoing and future development to take into account the existing and future risks by avoiding high risk areas through proper land-use, mitigating physical risks through design, construction and proper maintenance and coordination, and increasing institutional capacity sand preparedness. MEF in its overarching and coordinating role is well-placed to promote resilient investment decisions, implemented by respective line ministries. Policies and technical guidance is still lacking to protect key economic sectors and assets at risk, including the transport network.

9. **The transport sector is the most affected by natural disasters and the impacts are expected to become more pronounced under the influence of climate change.** In 2011, the sector sustained the largest impact among sectors amounting to US$344 million or 57 percent of the total damages and losses caused by the floods.[12] Similarly in 2013, transport recorded the largest sectoral damages totaling US$79.6 million or 52 percent of the total flood damages.[13] Flooding in 2011 and 2013 damaged 1,842 km and 1,557 km of rural roads with reconstruction costs of US$127 million and US$53 million, respectively.[14] Over 80 percent of rural roads in Cambodia are still unpaved, causing significant problems during the wet season due to road destruction and high operation and management costs. Flood waters cut off communities who are unable to access economic corridors that connects them to markets and social services.

10. **Transport sector is of strategic importance to the development of the country with both passenger and cargo transport predominantly depended on the country's road network**. The road network comprises of approximately 50.000 km, including about 12,200 km of national and provincial roads and approximately 38,500 km of rural roads (see Annex 1). The Ministry of Public Works and Transport (MPWT) is responsible for the national and provincial road network, while the Ministry of Rural Development (MRD) is in charge of rural roads, which account for about 77 percent of the total road network. The rural road infrastructure provides important links for the country's predominantly rural population.

11. **Strengthening disaster risk financing would help Cambodia to systematically manage the financial impact of disasters and improve its post-disaster response financing capacity.** Cambodia has limited financial capacity to respond to disaster events. A general contingency budget - approximately US$115 million over the past 5 years - held by the Office of the Council of Ministers, can be used to finance unforeseen expenditure, including post-disaster expenditure. The MEF estimates that less than 10 percent of this budget is used annually for disasters. Emergency response costs, particularly floods, can cause significant short-term funding gap and divert the use of public funds. Given the limited

[12] Asian Development Bank. 2012. Flood Damage Emergency Reconstruction Project, Preliminary Damage and Loss Assessment, March 2012.
[13] Royal Government of Cambodia. 2014. *Cambodia Post-Flood Early Recovery Needs Assessment Report.*
[14] Asian Development Bank. 2012. Flood Damage Emergency Reconstruction Project, Preliminary Damage and Loss Assessment.

ability of the government to access domestic and international credit sources, insurance markets, or raise tax revenue after disasters, recovery and reconstruction costs of past disasters have been partially met through budget reallocation by line agencies and donor assistance, which is often unpredictable or reallocated from existing projects. This causes delays in government response and impacts financing of development priorities. When major disaster costs remain unaddressed, they are absorbed by the affected populations, making the most vulnerable traditionally worse off.

12. **This project will support key Government agencies in mainstreaming of DRM into development and strengthening financial resilience.** The project will support the technical capacity of MEF to develop stronger DRM analytics and strengthen its policies and guidelines for public investment planning to facilitate integration of resilient principles into sectoral development. It will also help MEF to develop a DRFI strategy and financing instruments to help protect government finances. These upstream regulatory planning tools will be complemented with downstream implementation in the transport sector. The proposed project will help to strengthen MRD to integrate disaster resilience in its policies and systems. The resilient approaches will be demonstrated through the rehabilitation of rural roads along the Mekong and Tonle Sap to withstand regular flooding, reducing regular reconstruction costs, and improving the connectivity of communities to market allowing for all-weather access. This project will leverage a comprehensive approach to making road sector investments resilient to the impacts of natural disasters. Structural investments will be complemented with institutional capacity-building to help mainstream resilience with a long-lasting positive impact on the development of the sector. Communities' capacity for risk management will be strengthened through improvements in last-mile early warning and community-based disaster risk management (CBDRM).

C. Proposed Development Objective(s)

13. The Project Development Objective (PDO) for the Southeast Asia Disaster Risk Management program is to reduce the impacts of natural hazards – in Cambodia this will entail improving climate resilient rural road connectivity in select provinces and providing immediate and effective response to an Eligible Crisis or Emergency.

Key Results (From PCN)

14. The achievement of the PDO will be measured through the following key indicators:

i. Number of beneficiaries benefitting from all-season rural roads (no.); of which are poor (%); of which are female (%).
ii. Cambodia has access to sovereign disaster risk insurance (Y/N).
iii. Disaster risk analytics used to inform public investment planning (Y/N).

D. Concept Description

15. **The Cambodia Southeast Asia Disaster Risk Management Project will support key Government agencies in mainstreaming of DRM into development and strengthening financial resilience**. The proposed project will help mainstream disaster resilience in the rural roads along the Mekong and Tonle Sap to withstand regular flooding, reducing regular reconstruction costs, and improving the connectivity of communities to market allowing for all-weather access. Structural investments will be complemented with institutional capacity-building and the development of technical guidelines to help mainstream resilience with a long-lasting positive impact on the development of the sector. Communities' capacity for risk management will be strengthened through improvements in last-mile early warning and

community-based disaster risk management (CBDRM). Early warning systems and community preparedness planning will strengthen the preparedness of rural households. To enhance the capacity of Cambodia to finance disaster response, the project will support technical capacity of MEF and help to develop a national DRFI strategy and financing instruments to help protect government finances, including a solution on a regional scale where Cambodia will participate in a regional risk pooling mechanism joined by Lao People's Democratic Republic, and the Republic of the Union of Myanmar. With stronger analytics, capacity and awareness on the importance of investing in DRM, the proposed project will support the MEF in strengthening its policies and guidelines for public investment planning to facilitate integration of resilient principles into sectoral development.

Component 1. Resilient Rural Corridors (US$60 million IDA Credit, US$3 million Counterpart Financing)

16. This component will focus on resilience of rural road corridors through upgrading rural roads and strengthening the preparedness of surrounding communities. It will be implemented by MRD in Stung Treng, Kratie, Kampong Cham, Tbong Khmum, Siem Reap, and Kandal, six highly flood-prone provinces along the Mekong and Tonle Sap basins.

17. *Sub-component 1.1. Resilient Rural Roads Rehabilitation and Maintenance (US$57 million):* This component will finance the climate resilient rehabilitation and maintenance of about 250 km of rural roads that are regularly damaged from recurrent flood events.

18. Sound engineering designs, sufficient drainage, and greening approaches will be applied to enhance the resilience of the road structures. Where appropriate, labor-intensive methods and green construction materials will be supported for construction and maintenance. Traffic safety measures, particularly near schools, will be included. Opportunities for dual purpose infrastructure will be sought, whereby the rural road networks function as water control measures, by raising the road levels or introducing water gates to control water flows in dry and wet seasons. These works will be complemented with a safe villages program that combines road safety training with community based disaster risk management (CBDRM). The CBDRM program will strengthen risk reduction and preparedness in the communities adjacent to the roads. Throughout the project cycle, local communities will be consulted so that their knowledge of the area and concerns are integrated into the project design and implementation. Criteria used to prioritize rural roads for upgrading under this project are provided in Annex 1.

19. *Sub-component 1.2. Institutional Strengthening for Disaster Resilience (US$3 million):* This sub-component will finance institutional strengthening within the rural road sector. In particular, this component will (i) develop resilient roads design, construction, and maintenance guidelines, (ii) support quality control through field laboratories, and (iii) upgrade the rural road inventory to improve prioritization and road asset management.

Component 2. Disaster Risk Financing and Insurance (US$10 million Counterpart Funding + US$1 million TF Grant)

20. The objective of this component is to increase the disaster resilience of Cambodia by enhancing MEF's capacity to integrate disaster and climate resilience into development, and enhance the Government's capacity to meet post-disaster funding needs. This component will be implemented by MEF.

21. *Sub-component 2.1. Support for Strengthening Disaster Resilience (US$1 million TF Grant):* This sub-component will: (i) build capacity MEF to systematically mainstream disaster and climate resilience into public investment planning and development processes, in coordination with other relevant line Ministries and NCDM, (ii) build capacity on disaster risk financing and insurance within MEF, including supporting the preparation and implementation of a national disaster and climate risk finance strategy; and (iii) facilitate the country engagement in the preparation and implementation of a

regional disaster risk pooling mechanism, such as the establishment of the Southeast Asia Disaster Resilience Insurance Fund (SEADRIF), designed to provide participating countries with effective and affordable post-disaster rapid response financing. This sub-component will be financed through recipient-executed trust fund grants.

22. *Sub-component 2.2. Payment of Disaster Risk Insurance Premium (US$10 million Counterpart Funding):* This sub-component will assist the Government in securing access to sovereign disaster risk insurance by financing its premium for three years to an international risk carrier such as the newly established SEADRIF or through the World Bank Treasury. This sub-component is important to show commitment of Cambodia in moving this initiative forward, especially as significant donor funding will be required to establish SEADRIF.

Component 3: Project Management (US$3 million IDA Credit)

23. The objective of this component is to support the day-to-day implementation of the project. It will finance institutional support and capacity development for project management, coordination, procurement, financial management, technical and safeguards aspects, monitoring and evaluation (M&E), and reporting.

Component 4: Contingent Emergency Response Component (US$0)

24. This component will allow for a reallocation of credit proceeds from other components to provide emergency recovery and reconstruction support following an eligible crisis or emergency. An Emergency Response Operations Manual will be developed for the specific eligible disaster, detailing financial management, procurement, safeguard, and any other necessary implementation arrangements.

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SAFEGUARDS

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

The physical works of the project, under Component 1, will entail the rehabilitation, repair and maintenance of road sections in six provinces, namely Kandal, Kampang Chan, Tboung Khmum, Kratié, Siem Reap and Steung Treng.These are six highly flood-prone provinces along the Mekong and Tonle Sap basins, which were most affected by the most recent major flood events.

Each province has its own rich and diverse ethno-cultural characteristics. Ethnic minorities are present in Stung Treng, Kratie, and potentially in small numbers in other provinces. The rehabilitation of roads will benefit the population of the targeted provinces equally.

The proposed road strengthening could have some impacts on nearby habitats, wildlife corridors, wetlands, or river basins in the Component 1 project locations. Roads may alter water flow from one side to the other. This can result in flooding on one side of the road and water shortages on the other one, altering vegetation and associated ecosystems. Hydrologic studies will be undertaken and construction will be designed in a way to minimize any potential impacts.

An indirect positive consequence of the project could be the mitigation of drought impacts in the targeted communities. Concerns were expressed regarding the lack of water for livestock, homestead gardens and potable water during the dry season. These concerns could be mitigated as an indirect result of the proposed project, for instance, through the conversion of borrow pits into environmentally-friendly community water retention ponds.

Given that specific sub-projects and locations are not know at the time of appraisal, the Government will prepare an ESMF to provide guidelines to ensure that the project is implemented in an environmentally and socially sustainable manner in line with World Bank and Government safeguards regulations.

Component 2 on disaster risk financing and insurance will support the government to entrance fees and/or insurance premiums. The component does not finance any downstream physical investments but it finances the premium for the government to purchase catastrophe risk insurance for 3 years, therefore no safeguards are triggered by this Component.

B. Borrower's Institutional Capacity for Safeguard Policies

The MRD Environment and Social Office (ESO) has 10 staff implementing and monitoring safeguard requirements and compliance for MRD investments. Project's safeguard instruments will be implemented under ESO with the support of Ministry of Environment and General Department of Resettlement in MEF. Three staff from the ESO have been appointed as focal points for project safeguards; one staff with extensive knowledge and experience in World Bank and Government safeguards policies. Requirements for training and support in safeguards implementation and monitoring will be assessed. They will receive support through a consultant team that will assist in the implementation of the safeguard requirements while building staff capacity.

The central project team in MRD will review impact assessment reports prepared by subnational PMOs and prepare draft terms of reference for preparation of subsequent safeguard instruments, such as ESMP/ ECoP. As required, a stand-alone EMP, limited ESIA, ARAP, and EGDP would be prepared for specific subprojects. These plans will be consulted and disseminated to concerned stakeholders, and their feedback will be incorporated. Documentation will be publicly disclosed and submitted to the World Bank for review.

C. Environmental and Social Safeguards Specialists on the Team

Sybounheung Phandanouvong, Makathy Tep

D. Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The proposed road rehabilitation will be implemented on the existing right of way. Significant negative environmental impacts are not anticipated and impacts will be limited to dust, noise, household business disturbance (in populated communities), sourcing if materials, and waste during construction. These issues are minor and site specific. They can be managed by applying good construction practices. The use of materials for the construction will be monitored.

Natural Habitats OP/BP 4.04	Yes	The proposed road strengthening under component 1 could have some impacts on nearby habitats, wildlife corridors, wetlands, or river basins, therefore Natural Habitats is triggered as a precautionary measure. Sub-projects will be designed in a way to maximize flood resilience, while minimizing natural habitat disruption and sit-specific ESMPs will be developed to help mitigate this risk.
Forests OP/BP 4.36	No	While Stung Treng and Stung Treng include a Ramsa site and rich of forest resources, the project or any sub-projects do not impact forests, wildlife animals, and non-timber forest products degradation.
Pest Management OP 4.09	No	The project will not lead to an increased use of pesticides.
Physical Cultural Resources OP/BP 4.11	Yes	There is a possibility that physical cultural resources could be found during eventual construction of infrastructure that is to be studied and designed through this project, especially in the indigenous people's areas. For such a case, a chance-finds-procedure will be included in the Environmental and Social Management Framework (ESMF).
Indigenous Peoples OP/BP 4.10	Yes	Preliminary assessment suggest that ethnic minorities are present in Stung Treng and Kratie, and potentially in small numbers in other provinces. They may be directly or indirectly impacted by the proposed project investments in target provinces. In view of this, OP/BP4.10 is triggered by the project. An Environmental and Social Management Framework (ESMF) with consultations will be developed during project preparation. The Ethnic Groups Development Framework (EGDF) will be prepared to address potential adverse social impacts to the ethnic minorities that may occur due to the implementation of the project. This policy framework requires that special measures be established to ensure that the interest of ethnic minorities are protected and that they are engaged in a process of free, prior, and informed consultation which results in broad community support to the project.
Involuntary Resettlement OP/BP 4.12	Yes	The project triggers the OP/BP4.12 policy on Involuntary Resettlement. Land acquisition and structure relocation are expected to be minor and temporary since a minimization of resettlement is a criteria used in road selection and since the project roads will be upgraded on the existing alignment and the right of way. The project may impact also shops

		and small businesses along the roads. The Resettlement Policy Framework (RPF) will be applied by all subprojects to address potential adverse social impacts due to involuntary acquisition of assets and changes in land use. RPF will include provision for compensation and rehabilitation assistance, and if land donation is involved, procedures for land contributions.
Safety of Dams OP/BP 4.37	No	The project does not involve construction of dams, reservoir dykes or other facilities that would impact downstream and upstream resources
Projects on International Waterways OP/BP 7.50	No	The sub-projects are minor and localized with no impact on international waterways.
Projects in Disputed Areas OP/BP 7.60	No	The sub-projects do not take place in disputed areas.

E. Safeguard Preparation Plan

Tentative target date for preparing the Appraisal Stage PID/ISDS

Dec 09, 2016

Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing should be specified in the Appraisal Stage PID/ISDS

An ESMF, RPF and IPPF will be prepared before project appraisal; with public consultations per WB policy.

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APPROVAL

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Note to Task Teams: End of system generated content, document is editable from here.