

**INTEGRATED SAFEGUARDS DATA SHEET
APPRAISAL STAGE**

Report No.: ISDSA11800

Date ISDS Prepared/Updated: 20-Jan-2015

Date ISDS Approved/Disclosed: 19-Nov-2014, 22-Jan-2015

I. BASIC INFORMATION

1. Basic Project Data

Country:	Armenia	Project ID:	P148836
Project Name:	Armenia Social Investment and Local Development Project (P148836)		
Task Team Leader(s):	Erkin Mamadaliev		
Estimated Appraisal Date:	02-Dec-2014	Estimated Board Date:	13-Mar-2015
Managing Unit:	GSPDR	Lending Instrument:	Investment Project Financing
Sector(s):	Other social services (87%), Public administration- Other social services (13%)		
Theme(s):	Rural services and infrastructure (30%), Other human development (30%), Municipal governance and institution building (20%), Decentr alization (10%), Participation and civic engagement (10%)		
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?			No
Financing (In USD Million)			
Total Project Cost:	42.85	Total Bank Financing:	30.00
Financing Gap:	0.00		
Financing Source			Amount
Borrower			11.02
International Bank for Reconstruction and Development			30.00
Local Communities			1.84
Total			42.85
Environmental Category:	B - Partial Assessment		
Is this a Repeater project?	No		

2. Project Development Objective(s)

Improve quality and use of and access to community and inter-community infrastructure.

3. Project Description

The proposed project will include three components:

Component 1: Support to Socio-Economic Development and Capacity Building at the Local Level (US\$24.4 million, of which US\$17.7 million IBRD loan). Under this component, SILD project will follow the model of previous ASIF projects to implement small-sized investment projects (known as micro-projects) targeting vulnerable communities to address priority basic needs. Community investment micro-projects will be chosen using a two-stage poverty targeting strategy, with the first level defining broad allocations for marzes (regions) and the second level identifying needy communities. Needy communities are identified using a community profiling and mapping exercise based on criteria relating to social, demographic, economic, financial, geographic, and infrastructure conditions. Under ASIF's community-driven development approach, communities are responsible for (a) identifying their priorities using participatory methods; (b) contributing to the financing of the selected micro-projects (at a 5-10% community contribution rate), and (c) maintaining these projects after completion. This operational model, successfully implemented under past ASIF projects, will continue to be the primary mode of SILD project operations, particularly during its first years.

This component will fund approximately 120 micro-projects. Through the micro-project process, SILD project will: a) rehabilitate and develop community infrastructure and services (public, social, economic, environmental), (b) build institutional and financial capacity at the community level to develop and implement these projects and services, and (c) provide consultancy and technical assistance to local partners, such as community councils. The micro-project selection methodology for projects under this component will continue to be based on: (a) the vulnerability ranking of the community; and (b) the technical quality of submitted applications/projects. As part of SILD project preparation, ASIF is reviewing and updating its methodology and tools for community assessment and vulnerability ranking. The revised methodology will continue to classify all the communities into three clusters based on their vulnerability. SILD project will maintain the policy implemented under ASIF III targeting at least 40 percent of loan funds under this component to communities in the most vulnerable cluster, and providing up to 20 percent of funds to finance micro-projects in communities in the least vulnerable cluster. The updated targeting methodology will be included in the Project Operational Manual.

The menu of micro-projects to be financed under this component includes: renovation and rehabilitation of key social infrastructure covering education (i.e., kindergarten, primary, secondary and special schools) and health (i.e., primary healthcare clinics); multipurpose community centers; social service centers for vulnerable groups; water supply systems; sanitation systems; minor irrigation works; rural electrification; school heating systems; and rehabilitation of gymnasiums and playgrounds. Depending on the priority needs identified by selected communities, new small-scale construction projects may be financed. This component would also finance goods for micro-projects, primarily in the form of furniture for rehabilitated schools, kindergartens and community centers. To ensure proper design and supervision of community infrastructure micro-projects, this component would finance local consultancies for micro-project design, supervision and field work in the form of technical assistance and logistical support.

Capacity building for community councils, school boards and micro-project implementing agencies to effectively plan and maintain their investments will be undertaken under this component. SILD project will reinvigorate existing sustainability measures and will introduce new ones to improve operation and maintenance of new and rehabilitated community infrastructure under the project as outlined in the Sustainability section below. In order to further build local institutional and financial

capacity, key stakeholders (i.e. municipal officials, village council members, community leaders, etc.) will be trained in areas such as financial management, budgeting, accounting, and asset management.

Component 2: Support to Inter-Community Social and Economic Development Initiatives (US\$13.5 million, of which US\$10.1 million IBRD loan). This component will directly support the Armenia Development Strategy 2012-2015 objectives of reducing regional socio-economic disparities and promoting harmonic territorial development by financing innovative inter-community socioeconomic development initiatives. These initiatives, known as sub-projects, will finance infrastructure and services which have both social and economic impact and can catalyze future economic growth and human capital development for a region or group of communities. Through this component, SILD project will also strengthen inter-community dialogue, priority-setting and development planning and management. The component will include a particular focus on vulnerable and lagging regions.

This component is aligned with the GOA's planned territorial development reform which targets the agglomeration of community clusters into structures optimal for balanced development. As the agglomeration process, which is yet to be fully defined by the GOA, will happen in phases rather than over a set and established timeline, this component will proceed in parallel with the process but in alignment with its overall objectives. The component will supplement the agglomeration process in two ways. First, it will foster linkages and shared opportunities for socioeconomic development, between and among communities. This component will support inter- or multi- community projects (sub-projects) and will support shared capacity-building and planning. Second, sub-projects will expand beyond the traditional ASIF model of infrastructure-focused micro-projects to longer-term sustainable territorial development sub-projects able to promote social capital and livelihood and employment opportunities. Sub-projects should also strengthen the environment for further economic investment and provide incentives for communities to explore potential development synergies.

As this is a novel component for ASIF, a series of preliminary studies are being undertaken to inform its detailed design. These include analyses of international good practices around regional socioeconomic development and social inclusion schemes, of regional socioeconomic development and growth potential throughout Armenia, of institutional and legal modalities to enable inter-community development collaboration, and of methodologies and tools for the preparation and evaluation of sub-projects. These studies are expected to be completed during the project preparation process and prior to project signing.

A phased implementation approach has thus been adopted for this component. In this approach, the first year of the project will be used to finalize the design of this component in light of the findings of the preparatory studies with respect to: (i) local potential for economic growth and socio-economic development, (ii) the appropriate level of local co-financing, including co-financing from communities and private business, (iii) mechanisms for coordination and synergy with other development initiatives in project areas, (iv) links to the mid-term development program of the region, (v) the potential for sub-project sustainability and (vi) capacity-building needs within ASIF, and at community, marz and national level for the successful implementation of this component. The specific types or menu of sub-projects to be supported under this component will also be confirmed at this time. Based on international experience these would be expected to be productive communal investments which could, for example, support improved agricultural production or commerce (e.g. irrigation, transport), improved conditions for production or manufacturing (e.g. waste management, water systems) or improved human capital development opportunities (e.g. training and skills development centers). However, only public goods which are sustainable with public investment

will be supported.

A piloting process for the component will then begin in project year two. During this year a small number of sub-projects will be financed, with a focus on generating experience and models that can be more widely applied throughout the country and on necessary refinements to the component design. In project year three, the component will be scaled up, with more complex sub-projects becoming eligible for support. During the piloting process, the Project will focus on communities that are most ready to cooperate together and develop viable investment proposals, overlapping as feasible, with those communities identified by the GOA for agglomeration. There is a risk, however, that these communities might not be the poorest. As such, the Project will privilege inter-community collaborations that include vulnerable communities and will develop a program of support for accompaniment of more vulnerable communities in preparation and finalization of sub-projects. Overall SILD will be expected to fund the design, selection and implementation of approximately 25 - 30 of inter-community sub-projects.

Component 3: ASIF Institutional Strengthening and Project Management (US\$5 million, of which US\$2.2 million IBRD loan). This component will finance project management and operating costs, including salaries, utilities, office equipment, field supervision, training, financial audits, fiduciary and safeguards oversight, monitoring and evaluation and management information systems. In addition, it has been recognized that in order to reduce dependence of ASIF and the future Territorial Development Fund on World Bank financing, it would be appropriate for the World Bank's share in funding operating costs to decline over the life of the project. As such, whereas the World Bank financed 50 percent of project operating costs throughout previous projects, the Bank's share of funding for operating costs will decline over the course of SILD project implementation by five percent each year thereafter, bringing it down to 30 percent in year five. It is expected that the financing gap will be covered by the Government and, potentially, by other donors.

This component will also support ASIF's transition to a Territorial Development Fund. The Government of Armenia passed a formal decision on "Approval of the ASIF's Development Strategy and the Creation of a Territorial Development Fund on the Basis of the Restructuring of ASIF" which entails the transformation of ASIF into a territorial development fund (TDF) as of January 2015. ASIF will transition to a TDF with the objective of supporting territorial development policies to reduce territorial disparities and support balanced and sustainable development of all Armenian regions. As ASIF has been the primary channel of capital investment funding to communities, it is expected that when it transitions into the TDF it will also become the primary channel to deliver capital investment funding for territorial development. ASIF/TDF also intends to evolve its funding model, moving away from a predominantly WB-financed model towards a greater diversity of funding sources through which it can improve its financial sustainability. This component will support ASIF to develop this fund-raising capacity.

An institutional assessment to review ASIF's existing structure and capacity is currently ongoing as part of the SDC grant. It will propose recommendations and an action plan for filling any gaps identified, building capacity and enhancing the structure and operations of ASIF to meet its new mandate. This component will build on the findings of that assessment and support implementation of its recommendations. These are expected to include a range of activities which will directly support ASIF's institutional development including: (a) development of new tools and approaches, including methodologies and guidelines for appraisal, promotion and selection of projects, (b) procedural improvements, including in monitoring and evaluation and financial management, (c) staff capacity building, (d) organizational/structural changes; and (e) outreach strategy to assist ASIF

to diversify its sources of funding by helping it brand itself and reach out to potential financiers in order to finance its programs.

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

Nationwide. SILD Project will target vulnerable communities in all regions of Armenia.

5. Environmental and Social Safeguards Specialists

Darejan Kapanadze (GENDR)

Sarah G. Michael (GSURR)

Yousif Mubarak EIFadil (GSURR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>Vast majority of individual micro-projects and sub-projects to be financed under the SILD project will support rehabilitation or enhancement of small to medium size public infrastructure. Minor new construction may be supported as well. This type of investment is unlikely to have significant negative environmental impacts. Vast majority of the potential sub-project proposals are likely to fall under environmental Category B or C. Category A micro-projects and sub-projects will be filtered out through environmental screening and will not be supported under the SILD project.</p> <p>Because the sub-project proposals will arrive and be reviewed on the rolling basis, most of them will not be known by the time of the project appraisal. ESMF prepared for SILD project establishes guiding principles of (i) environmental and social screening of micro-project and sub-project proposals, (ii) identifying the expected impacts of micro-projects and sub-projects at their construction and operation phases, (iii) setting forth measures for mitigating environmental and social risks, and (iv) monitoring of environmental performance under the supported micro-projects and sub-projects. Site-specific Environmental Management Plans (EMPs) will be developed, disclosed, and consulted with local communities prior to commencement of works at any individual sub-project site. Environmental due diligence will be built into the general procedures of sub-projects' selection, approval and monitoring and the Project Operational Manual will provide step-by-step guidance on this. Adherence to these procedures and implementation of EMPs will be closely supervised by ASIF.</p>

Natural Habitats OP/BP 4.04	No	
Forests OP/BP 4.36	No	
Pest Management OP 4.09	No	
Physical Cultural Resources OP/BP 4.11	No	OP/BP 4.11 Physical Cultural Resources is not triggered, as the project will not finance civil works at any known sites of historical and/or cultural heritage and the number of micro-projects and sub-projects involving new construction is expected to be minimal. In the unlikely case of chance finds, construction supervisors will follow guidance of the Project Operational Manual, which calls for immediate suspension of works, notification to the State authority for cultural heritage, and adherence to the course of action worked out by such authority.
Indigenous Peoples OP/BP 4.10	No	
Involuntary Resettlement OP/BP 4.12	Yes	OP/BP 4.12 is triggered and a Resettlement Policy Framework (RPF) has been prepared and will be included into the Project Operational Manual to facilitate implementation of sub-projects under Component 2 which may trigger resettlement (No activities with resettlement impacts will be permitted under Project Components 1 and 3). If required, Resettlement Action Plans (RAPs) will be developed for sub-projects following the guidance provided in the RPF. They will be disclosed, consulted with the sub-project-affected people, approved and implemented prior to commencement of works at a given site. The RPF includes clear grievance redress procedures to be maintained throughout the project implementation period.
Safety of Dams OP/BP 4.37	No	
Projects on International Waterways OP/BP 7.50	Yes	Some irrigation schemes operated in Armenia abstract water from trans-boundary rivers and/or their tributaries. Discharge from a number of waste water collection systems enters surface water bodies that flow into international waterways. Since the final design of some activities under Component 2 (subprojects) will be only completed at a later stage, and the features of those activities are currently unknown; the criteria for the selection of subprojects will exclude activities that may

		involve the use or potential pollution of international waterways. On the other hand, as part of the activities under Component 1 (microprojects), the SILD project may support renovation/rehabilitation of existing community level water supply, sanitation, and irrigation schemes which are not known upfront and will be identified on a rolling basis during the project's life. Hence, there is a likelihood of financing works on the infrastructure that intakes or discharges water into international waterways. However these activities will not exceed the scope of the existing schemes owing to the small size of individual investments. As such, they (i) will not adversely change the quality or quantity of water flows to the other riparians; and (ii) will not be adversely affected by the other riparians' possible water use.. The vast majority of physical works under Component 1 of the SILD project will be confined to the repair of the existing infrastructure. For water, wastewater and irrigation systems this would exclude increase in their design capacity of water intake and/or discharge. Rehabilitation works on water-related infrastructure will be predominantly aimed at cutting water loss due to leakages and overflows from damaged/clogged passages and malfunctioning of dilapidated hydraulic structures. Therefore, while OP/BP 7.50 "Projects on International Waterways" is triggered, communication between the riparian states on the project interventions is deemed unnecessary. An exception from the requirement for the notifying the other riparian states was obtained from World Bank Management on January 15, 2015.
Projects in Disputed Areas OP/BP 7.60	No	

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

<p>1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:</p>
<p>Environment risks associated with SILD project are low and the majority of the sub-project proposals are likely to fall under environmental Category B or C. Micro-projects and sub-projects that are classified as environmental Category A and/or may potentially impact quality and/or quantity of water in international waterways will be filtered out through environmental screening and will not be supported. Armenia is earthquake prone, which is a risk to the project investments and will be considered in the process of selecting micro-projects and sub-projects. Because the micro-project and sub-project proposals will arrive and be reviewed on a rolling basis, most of them were not known by the time of the Project appraisal. Therefore, an Environmental and Social Management Framework (ESMF) was developed to establish guiding principles of (i)</p>

environmental and social screening of micro-project and sub-project proposals, (ii) identifying the expected impacts of micro-projects and sub-projects at their construction and operation phases, (iii) setting forth measures for mitigating environmental and social risks, and (iv) monitoring of environmental performance under the supported micro-projects and sub-projects. Site-specific Environmental Management Plans (EMPs) will be developed, disclosed, and consulted with local communities prior to commencement of works at any individual investment site. Environmental due diligence will be built into the general procedures of sub-projects' selection, approval and monitoring and the POM will provide step-by-step guidance on this. Adherence to these procedures and implementation of EMPs will be closely supervised by ASIF.

OP/BP 4.12 Involuntary Resettlement is triggered on a precautionary basis as the type and location of new Project activities under Component 2 are not yet known, and the type and scale of civil works and land acquisition are still to be determined. A Resettlement Policy Framework (RPF) has therefore been prepared and will be followed by all Project activities. The RPF was consulted with stakeholders and disclosed publicly. Site-specific Resettlement Action Plans (RAPs) will be prepared and implemented prior to commencement of works at any site where resettlement, land use or acquisition is required. However, as was the case under the ASIF3 Project, under Component 1 of SILD, no micro-projects involve land acquisition (permanent or temporary) or resettlement will be approved; and no civil works are planned under Component 3.

Some irrigation schemes operated in Armenia abstract water from trans-boundary rivers and/or their tributaries. Discharge from a number of waste water collection systems enters surface water bodies that flow into international waterways. There is a likelihood of SILD project financing works on the infrastructure that intakes or discharges water into international waterways. However the Project implementation will not cause measurable impact on the quality and/or quantity of water in trans-boundary water bodies because for water, wastewater and irrigation systems no new construction will be allowed and only those small to medium size rehabilitation works will be eligible for funding that do not affect design capacity of water intake/discharge of the existing schemes. Therefore, while OP/BP 7.50 Projects on International Waterways is triggered, communication between the riparian states on the Project interventions is deemed unnecessary.

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

No negative indirect and/or long term impacts are expected due to anticipated future activities in the project area. Improved operation of the rehabilitated priority public infrastructure is expected to have a positive social impact on the beneficiary communities.

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

Sub-projects requiring land acquisition or resettlement have been excluded from Component 1. This will decrease social risks of the Project and simplify sub-project preparation and supervision. However given the objective of supporting potentially transformative inter-community socio-economic development projects under Component 2, the decision was made not to ban sub-projects based solely on the likelihood of resettlement. If a sub-project is otherwise eligible and well justified, but triggers resettlement, it will be handled in full compliance with OP/BP 4.12 on Involuntary Resettlement and a RAP will be prepared, as applicable.

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.

An ESMF for the project has been prepared. It spells out procedures for environmental and social

screening, review, and supervision of SILD project-financed activities, as well as mechanisms of reporting on the outcomes of environmental monitoring of sub-projects. Information on the environmental performance will be fed into the integrated Monitoring and Information System and used in the process of portfolio management by ASIF. For micro-projects and sub-projects with the reported environmental issues, corrective actions will be prescribed and closer field supervision will be planned.

The project will be implemented by ASIF - an agency with strong administrative capacity and technical expertise with an operation history of 18 years. ASIF has a high capacity staff, sound financial management and procurement systems and reporting mechanisms that are currently used under the ASIF III project. Environmental management had been a relative weakness of ASIF several years ago, however it improved considerably through the recruitment of an environmental specialist; integration of environmental screening and monitoring into the general procedures of projects' review, approval, and supervision; and quality enhancement of environmental record keeping. Overall, no cases of major environmental non-compliance have been identified during implementation of the ASIF III project to date, though there were issues with the quality of documented reporting on the environmental screening and monitoring of operations. Hiring of an environmental specialist led to tangible improvements which include the use of environmental screening and field monitoring checklists, and photo documentation of the findings from site visits. Maintaining a staff unit of an environmental specialist in ASIF will be critically important for ensuring good environmental performance under SLID project. In terms of social safeguards, as previous projects implemented by ASIF excluded civil works requiring land acquisition or resettlement, ASIF does not have experience overseeing compliance with OP/BP 4.12 and will require additional capacity to effectively supervise social safeguards compliance.

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

ASIF, beneficiary communities, and municipal governments will be the key stakeholders of the Project. ESMF and RPF have been made available for the stakeholders through the public disclosure and opened for feedback. Draft site-specific EMPs and Resettlement Action Plans (RAPs), if required, will also be disclosed and discussed with sub-project-affected people prior to finalization.

The process of consultation with the beneficiaries will take place at three stages: (i) public information and outreach campaign at the beginning of a micro-project cycle; (ii) appraisal of micro-projects; and (iii) monitoring and evaluation for assessing outcomes and results. All consultations will be gender-sensitive. Disclosure of the project-related environmental information and consultation with affected communities will be the responsibility of the ASIF and PIAs. ASIF will carry overall responsibility for the meaningful public involvement in the micro-project cycle. Beneficiary assessments, included in the monitoring and evaluation mechanism, will be used to obtain public feedback on the ongoing operations, including their environmental and social implications.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other	
Date of receipt by the Bank	24-Oct-2014
Date of submission to InfoShop	05-Nov-2014
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	

"In country" Disclosure	
Armenia	31-Oct-2014
<i>Comments:</i> http://www.armeniasif.am/reports/ESMF_SILD.pdf	
Resettlement Action Plan/Framework/Policy Process	
Date of receipt by the Bank	28-Oct-2014
Date of submission to InfoShop	05-Nov-2014
"In country" Disclosure	
Armenia	31-Oct-2014
<i>Comments:</i> http://www.armeniasif.am/reports/SILD%20RPF_2014_eng.pdf	
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 [<input checked="" type="checkbox"/>]	No [<input type="checkbox"/>]	NA [<input type="checkbox"/>]
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	Yes [<input checked="" type="checkbox"/>]	No [<input type="checkbox"/>]	NA [<input type="checkbox"/>]
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [<input checked="" type="checkbox"/>]	No [<input type="checkbox"/>]	NA [<input type="checkbox"/>]
OP/BP 4.12 - Involuntary Resettlement			
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes [<input checked="" type="checkbox"/>]	No [<input type="checkbox"/>]	NA [<input type="checkbox"/>]
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [<input checked="" type="checkbox"/>]	No [<input type="checkbox"/>]	NA [<input type="checkbox"/>]
OP 7.50 - Projects on International Waterways			
Have the other riparians been notified of the project?	Yes [<input type="checkbox"/>]	No [<input checked="" type="checkbox"/>]	NA [<input type="checkbox"/>]
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 [<input checked="" type="checkbox"/>]	No [<input type="checkbox"/>]	NA [<input type="checkbox"/>]
Has the RVP approved such an exception?	Yes [<input checked="" type="checkbox"/>]	No [<input type="checkbox"/>]	NA [<input type="checkbox"/>]
The World Bank Policy on Disclosure of Information			
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [<input checked="" type="checkbox"/>]	No [<input type="checkbox"/>]	NA [<input type="checkbox"/>]
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 [<input checked="" type="checkbox"/>]	No [<input type="checkbox"/>]	NA [<input type="checkbox"/>]
All Safeguard Policies			

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have costs related to safeguard policy measures been included in the project cost?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

III. APPROVALS

Task Team Leader(s):	Name: Erkin Mamadaliev	
<i>Approved By</i>		
Practice Manager/ Manager:	Name: Andrew D. Mason (PMGR)	Date: 22-Jan-2015