PROJECT INFORMATION DOCUMENT (PID)
APPRAISAL STAGE

Report No.: PIDA23351

Project Name	Ghana: Public Financial Management Reform Project (P151447)
Region	AFRICA
Country	Ghana
Sector(s)	General public administration sector (100%)
Theme(s)	Public expenditure, financial management and procurement (100%)
Lending Instrument	Investment Project Financing
Project ID	P151447
Borrower(s)	Government of Ghana
Implementing Agency	Ministry of Finance
Environmental Category	C-Not Required
Date PID Prepared/Updated	15-Mar-2015
Date PID Approved/Disclosed	24-Mar-2015
Estimated Date of Appraisal Completion	11-Mar-2015
Estimated Date of Board Approval	21-May-2015
Appraisal Review Decision (from Decision Note)	

I. Project Context

Country Context

Ghana is located on the western coast of Sub- Saharan Africa with a population of 27 million in 2014 and a per capita GDP of US$1,427. The country is a well-established democracy on the African Continent and is ranked 70th in the 2015 doing business report. Ghana commenced the production of oil in December 2010 which paved the way for a new era of fiscal expansion and growth from 2011 onwards. The planned fiscal expansion also brought challenges associated with its sustainability and the risks of re-igniting a boom and bust cycle. By 2014, Ghana's overall macroeconomic conditions had deteriorated with large fiscal and balance of payments deficits, fueling Government debt and inflation, a sharp depreciation of its currency, and a weaker pace of economic growth.

GDP growth significantly decelerated to 4.2 percent in 2014, while inflation accelerated to 17 percent, as a result of the energy rationing, currency depreciation, rising interest rates and policy uncertainty. Ghana's growth peaked at 14 percent in 2011 and declined gradually thereafter to 4.2 percent in 2014. The growth was bolstered by high gold and cocoa prices, robust political institutions, and the commencement of oil production. After the Heavily Indebted Poor Countries

(HIPC) debt reduction completion point in 2004 and the Jubilee field oil discovery in 2007, capital flowed into the country to finance the oil and mining sectors. But a combination of external and domestic imbalances contributed to macroeconomic instability even though the country has positive growth prospects. Ghana's potential growth rate per capita is between 5 and 6 percent per year. Real Gross Domestic Product (GDP) growth is expected to oscillate around 4 percent of GDP in the near term, well below its potential level in the medium term.

Ghana has registered twin deficits (fiscal and balance of payments) in excess of 10 percent of GDP since 2012, as a result of both external and domestic shocks. Within the external shocks, the most notable were the fall in gold prices and the cut-off of the gas supply from Nigeria that forced higher oil imports for the production of electricity. In 2012, when gold prices peaked at over US$1,600 per ton, gold exports reached US$5.5 billion, representing 42 percent of Ghana's exports of goods. By 2014, gold prices had tumbled to an average of US$1,275 per ton, and total exports shrunk to US$4.4 billion. In addition to the gold shock, Ghana was forced to import oil for electricity generation due to pipeline damage that cut-off Ghana from the gas supply from the West Africa Gas Pipeline, at the end of 2012. As a result of both shocks, the current account deficit reached 11.7 percent of GDP in 2012 and 2013, reducing modestly to 9.5 percent in 2014.

As a consequence of the chronic fiscal gaps and the currency depreciation, public debt rose to 64 percent of GDP in 2014 and interest payments rose to 7 percent of GDP. The financing requirements of the Government and the expectations of currency depreciation translated into higher interest rates, which reached 26 percent on 90-day T-bills. Interest payments rose from 3.2 percent of GDP in 2012 to almost 7 percent in 2014. The higher interest rates implied higher cost of capital to private firms, constituting an additional shock to the costs of production. Wages and interest payments exhaust Government revenue, leaving no space for other more potentially productive expenditure such as goods and services, maintenance, or capital spending. The depreciation of the Cedi had a negative impact on the fiscal accounts because of the rising oil import bill which was not fully transferred to consumers.

In 2013, in an effort to stabilize the economy, the Government of Ghana (GoG) adopted a home grown multi-year fiscal stabilization plan aimed at reducing the deficit. The plan, approved by Parliament in successive Budget Laws of 2012, 2013 and 2014 targeted end-year fiscal deficits (on a cash basis) of 4.8, 5.0 and 8.5 percent of GDP respectively. However, the end period actual fiscal deficits (on a cash basis) were 11.6, 10.2, and 9.6 percent of GDP respectively. Some of the fiscal bottlenecks that contributed to this discrepancy between the actual and planned deficits include the poor assessment of the costs of implementing the new single spine pay policy, the inability of Government to eliminate ghost workers from the payroll, the addition of high priority capital projects to the public investment plan without corresponding removal of lower priority projects, the payment of accumulated arrears, and the increasing cost of debt.

The fiscal deficit was partly contained thanks to the moderation in the nominal wage increase of public workers, though future wage bill growth is the main driver of fiscal risk. The wage bill declined from 8.9 percent of GDP in 2012 to 8.2 percent in 2014 due to the moderate increase in nominal wages in 2013 and 2014. A center-piece of the process was the agreement reached between labor and GoG to accept a cost of living allowance (Cola) of 10 percent (effective May 2014) in lieu of a general salary increase. The Cola froze the cost of pension in 2014 for employees on Government payroll. Despite these factors, other inherent challenges affecting the wage bill include the inability of Government to implement the net freeze in employment and a moratorium on public sector wage increase proposed in the budget laws since 2012.

In 2014, efforts were made by Government to clear accumulated arrears as part of the home grown policy framework. A total of Ghana Cedi (GH¢) 2,984 million (2.6 percent of GDP) was paid as ‘arrears clearance’. Thestock of arrears, however, increased, over the period 2009 to 2014, to 6 billion (5.2 percent of GDP). Since the arrears are claims on future budgets, they disrupt financial programming aimed at achieving fiscal targets, and thereby cause policy uncertainty. The reasons for the build-up of arrears on statutory funds are twofold. First, arrears provide interest-free funds to the fiscal managers during budget execution while resulting to higher prices for goods and services as suppliers hedge for delays in payment of future payments. Second, fiscal managers can afford to re-allocate statutory funds because sanctions against non-execution of the budget appropriation Act are not enforced.

The persistent high fiscal deficits and rapid depreciation of the local currency against the US dollar have contributed to the rapid rise in public debt which oscillates around 60 percent in 2014. High fiscal deficits imply a stronger need to borrow to finance the gap. Government financed the gap by issuing domestic securities to cover recurrent expenditure and by external non-concessional borrowing to cover capital expenditure. For instance, Ghana raised about US$2 billion of non-concessional debt from the international Eurobond market in 2013 and 2014 despite the lowering of its long-term foreign and local currency Issuer Default Ratings from B+ with a stable outlook in September 2012 to ‘B’ with negative outlook by Fitch rating in March 2014.

The expansionary fiscal policy financed partly by the central bank has also resulted in high inflation. The Bank of Ghana (BoG) financed an average of 20 percent the Government’s fiscal deficit between 2012 and 2014. End year inflation rose steadily from 8.8 percent in 2012 to 17.0 percent 2014, while non-food inflation increased by 12.3 percentage points to 23.9 percent in 2014. The producer price index (PPI) inflation oscillated around 17.1 percent throughout 2012 but rose to an average of 35.8 percent in 2014. Inflation has been associated with rising public sector wages, pass through effect of adjustments in the fuel and utility prices, and volatility in the domestic foreign exchange market which led to a sharp depreciation of the Cedi.

The Ghana Integrated Financial Management Information System (GIFMIS) now provides a strong platform for Government to tackle head on the bottlenecks in the management of the wage bill and public expenditure. In 2013, the Government started tackling the structural bottlenecks that affect wages and salaries, with a view to reducing the wage to tax ratio from 54 percent in 2012 to 35 percent by 2017. One of the wage reduction measures implemented included the upgrade of the payroll software to a higher version (Oracle 12). This enabled Government to begin unifying the payroll data across the public service and to re-align the payroll structure to the budget structure in order to facilitate its integration onto the Ghana Integrated Financial Management Information System (GIFMIS). Next, the Government introduced an Electronic Salary Payment Voucher System (ESPV) to facilitate the vetting of the payroll by the heads of Ministries, Departments, and Agencies. The system provides a control mechanism which helps better manage the challenge of ghost workers on Government payroll. Other wage reforms introduced in 2013 include the implementation of the Procure to Pay (P2P) system across all MDAs for the use of resources from the Consolidated Fund, provision of a unique biometric code to all staff on the payroll, electronic generation of pay slips with a feedback feature, and automation of the processing of pensions.

Sectoral and institutional Context

Weaknesses in Public Financial Management (PFM) combined with poor policy choices have led to the current macro-fiscal crisis. the emergence of structural budget deficits, weakening current account balances, a declining exchange rate and burgeoning debt are symptoms of underlying weaknesses in PFM systems and policy choices. While some of these structural issues can be attributed to external factors (e.g. global economic shocks, commodity prices and gas supply shocks from Nigeria), persistent weaknesses in PFM performance over a long period have also contributed greatly to current economic problems. These issues are well understood and the recently concluded negotiations for the IMF program have also recognized them. These weaknesses emerged despite a long history of public sector financial management reform. Over the last two decades, some progress has been made with PFM reforms; however much remains to be done.

The GoG implemented it first comprehensive Public Financial Management Reform Program (PUFMARP) during the period 1997-2003. The programs involved the development of IFMIS through the Budget and Public Expenditure Management System (BPEMS) and related PFM reforms, including Medium Term Expenditure Framework (MTEF), external and internal audit. Planning Reforms were introduced during 2006-2009 with the introduction of integrated Short and Medium Term Action Plans (ST/MTAP), following the release of the Ghana Shared Growth and Development Agenda (GSGDA I). This form of Short and Medium Term Action Planning was rolled out across Government between 2010 and 2013. The GSGDA, while comprehensive, lacks a focus on prioritization and sequencing, and appears to be relatively unconstrained in its costing. This deficiency has flowed through to sector plans, which are required to be reflective of the GSGDA. However, due to structural problems with the Budget, resourcing through the annual budget was rarely consistent with the GSGDA. This created disconnect between planning and budgeting.

The first decade of PFM reforms (1997-2009) produced very mixed results and did not help control the budget management challenges. The scope of the PFM reform program was overly ambitious, encompassing changes to PFM practices across MDAs, beyond the consolidated fund, and mixing process overhauls with changes in IT systems. The reforms were guided mainly by projects in individual areas which resulted in lack of synergy in the overall PFM reforms. Fiscal transfers were neither transparent, nor predictable, and lacked a fully-fledged and credible PFM improvement program at the decentralized level. The reform encountered strong resistance to change, particularly from MDAs and MMDAs. In the end, it did not meet its key objectives either of renovating core budgeting and accounting systems; or of changing budget commitment and execution behaviors in line ministries . However, the authorities and development partners were able to learn valuable lessons from this experience, which informed the approach taken in the subsequent phase of the reform.

The implementation of the Ghana Integrated Financial Management Information System (GIFMIS) span over the period 2010 – December 2014. It purposefully focused on the more modest objective of renovating core budgeting, accounting and financial reporting systems. It was successful in meeting this limited objective, but the challenges of changing behaviors in MDAs and MMDAs remains and is a core focus of the current operation. Through the GIFMIS project, the GoG has made significant strides in respect of financial accounting and reporting and has commenced the process of integrating and/or interfacing all significant PFM systems on the Government platform. Also within the GIFMIS project, significant work has been undertaken to implement a system of

Program Based Budgeting (PBB) in an attempt to simplify the budget process and re-establish a connection between policy priorities and the budget. Program Based Budgeting has been implemented in Ministries, Departments and Agencies (MDAs), with the first budget appropriated by programs in 2015 budget. The project has established the foundation for further development of a separate and comprehensive Human Resources Management Information System to strengthen the recruitment process in the public service and enhance the credibility of data that are fed into the payroll.

Decentralization of resourcing and service delivery to district administrations is well advanced, but remains incomplete. The GIFMIS project has supported this reform by rolling out budget and accounting elements of the system to MMDAs on a pilot basis. However, evidence indicates that the MMDAs are inadequately funded for effective service delivery. This results from: a) low levels of funding for MMDAs through the national budget; and b) low levels of Internally Generated Funds (IGF) generated. This is complicated by the fact that the Local Government Act specifies the organizational structure of each MMDA and the staffing of MMDAs is almost entirely financed through the national budget .

Compliance with the enabling legal framework for PFM and updating the related laws and regulations are critical for achieving success in PFM reforms. The existing key PFM related legislative framework consisting of the Financial Administration Act (Act 654, 2003) and the Financial Administration Regulations (LI 1802, 2004) were prepared at the time at which BPEMS was being undertaken and activity based budgeting was being implemented. They are standard instruments and cover most of the bases necessary for a strong PFM system, should they be adequately implemented. However, the introduction of PBB and on-going problems with indiscipline in budget formulation and execution processes would be assisted by a process to revise and update this framework. Critical areas for review include: introducing stronger rules for Government regarding fiscal responsibility, reinforcing processes that seek to impose discipline in PFM processes and strengthen the authority of the Minister of Finance for enforcing discipline, and specific provisions to enable program based budgeting and management. The IMF has scheduled Technical Assistance (TA) to assist the Government in this regard. The key issue however will not be so much the adoption of the new rules, but their consistent implementation, including in the face of political pressures towards spending above and beyond the country’s means.

The heavy emphasis on the upgrade of the IFMIS through the GIFMIS project was a necessary pre-requisite for improved PFM performance. However, it could not produce the required improvements in and of itself. Processes, disciplined actions, compliance with the law and regulations, all remain factors that are holding PFM performance back and diminishing the effectiveness of new systems. For instance, commitment controls embedded in the IFMIS (‘Procure to Pay”, or P2P) can help prevent extra-budgetary expenditures and fiscal arrears, but there are limitations to what the system can currently do. First, so far the IFMIS only covers the consolidated funds, which represents about 66 per cent of overall Government spending. This means that automated commitment controls are not in effect for about a third of Government spending. Second, automated controls will only be fully effective in preventing the generation of extra-budgetary spending if behaviors change. The MoF needs to make a credible commitment to only honor invoices that are supported by budget commitments generated in the IFMIS, and to follow through on this commitment; vendors need to be convinced to refuse to provide works, goods, services unless they receive evidence of a commitment in the IFMIS. The key issue is to restore discipline in budget planning, execution and oversight across Government.

Notwithstanding Government programs aimed at strengthening PFM in Ghana, significant institutional, policy, and systems and process weaknesses continue to manifest themselves, thus limiting the impact of reforms already implemented. The issues have been identified through the articulation of lessons learned during GIFMIS implementation, the directions embedded in the Government's medium term PFM Reform Strategy (2015-2018), and through a project preparation workshop where the stakeholders outlined the key problems that have led the country into an unsustainable fiscal path, as well as their views on the root causes of these problems.

• Credibility of the Budget: Budget credibility is low, and adversely impacts service delivery efficiency in Government. This is an overarching problem with multiple causes, starting with optimistic revenue forecasts, excessive capital spending, poor commitment controls, weak establishment controls over payroll, fiscal indiscipline and weak oversight of compliance. MDAs consistently claim that: budget planning ceilings are up to 50 per cent less than their own estimates of the resources required for delivering the required levels of service; budget allocations are often less than the budget planning ceilings; and cash releases during budget execution are often less than 50 per cent of the budget allocation, particularly for goods and services and capital investments. Many of the causes of this are a result of institutional, behavioral and policy weaknesses. Until these weaknesses are addressed, efficient and effective IT systems will not achieve their potential.

• Institutional fragmentation and Weak Coordination (including managing, analyzing, and sharing data): Preparing and managing a national budget must be seen as a corporate responsibility of the Ministry of Finance. This requires that all departments and agencies within the Ministry cooperate and share data. The Budget Division has to be proactive in coordinating this effort. This is improving in the MoF but significant further improvement is necessary, particularly to break down some of the silos that still exist in MoF.

• Fiscal and Process Indiscipline: Indiscipline in the budget execution and monitoring processes has worked to undermine the intentions of successive budget reforms and has resulted in the low levels of budget credibility, which is evident from successive Public Expenditure and Financial Accountability (PEFA) reviews. Although, there are identifiable challenges with the budget formulation and planning, the biggest problems exist during the execution period. It is, perhaps, the largest contributor to low budget credibility and is embedded in the institutional arrangements of Government. This indiscipline has several manifestations:

- Weak commitment controls;
- Weak Coordination: A number of stakeholders influence the preparation of the budget and the formulation of new budget policies. Some new budget policies are not adequately evaluated and their impact is usually unknown at the time of passing the budget in Parliament. Lack of coordination during budget execution leads to poor interpretation of new policies and thus partly account for policy failure and the missing of important budget targets. The result of this, was the accumulation of over GHC 6 billion (about US$2 billion equivalent) in arrears as at end December 2014.
- Political intervention on the capital budget, leading to unaffordable public investment program: There has been a long history of extra-budgetary expenditures, particularly from introducing new capital investments outside the normal budget planning phase and thus also initiating the accumulation of arrears. Tpractice has effectively undermined efforts to improve comprehensiveness of the budget. One reform that seeks to monitor and control the accumulation of arrears is the implementation of a commitment control system, 'procure to pay' (P2P), in the use of resources from the Consolidated Fund across all MDAs.
- Cash and debt management weaknesses: These have resulted in significant in-year reductions in budget allocations. They are, in part, due to the emergence of extra-budgetary

expenditure, a failure to incorporate all expenditures in the budget (significantly, the costs of on-going projects) and a lack of accurate costing of programs and activities. The impact of cash management failures has been to undermine confidence in the budget system (predictability in resource flows to service delivery agencies) on the part of spending units. This has strengthened the resistance of spending units to let the MoF centrally manage their own internally generated funds, statutory funds and donor funds, which represent 34 per cent of total budgetary spending. This, in turn, undermines the objective of comprehensiveness of the budget planning, execution, reporting and oversight. Debt management challenges ensue: the GoG is in the paradoxical situation of having to issue treasury bonds that are purchased in part by commercial banks using public funds sitting outside the treasury single account.

- Management and control of the Wage Bill: Recent historical ballooning of the wage bill was unsustainable as well as incompatible with convergence criteria established in treaties signed by Government with the West African Economic and Monetary Union (WAEMU). As part of measures to control the wage bill, the Government implemented an electronic Salary Payment Voucher System (ESPV) in 2014, targeted at reducing the risk of ghost workers on the Government payroll. The system provides many advantages to Government such as: faster and better management of Government Payroll Payment Vouchers; quick and easy access to historical salary payment voucher information for Audit and reference purposes; and allows the viewing of various payroll reports on-line in real time by salary policy makers. The IMF program for Ghana envisages a rapid fiscal consolidation, including a decline in real wages, strict payroll scrutiny, limits on net hiring and introduction of new revenue enhancing measures.

Added to the lack of credibility of the Government budget, the PFM Reform workshop highlighted four additional issues that require priority management to contribute to supporting the reversal of the current macro fiscal situation. These issues relate to: (a) lack of effective financial reporting and oversight (which is related to the limited scope of the IFMIS and the lack of proper management of accounts receivables and payables); (b) poor Asset Management; (c) weak identification and management of fiscal risk, particularly in relation to SOEs; and (d) system connectivity (and user friendliness of installed PFM systems).

The Public Financial Management Reform Project (PFMRP) design seeks to respond to the core of these weaknesses that can be implemented in the medium term. In particular, the project will aim to address key issues emanating from: budgetary planning weaknesses, human resources management and payroll control, lack of comprehensiveness in commitment controls, and the weak discipline in public investment management, as identified in the description of the components and their sub-components. However, the project by itself cannot provide the full reform outcomes unless complementarily supported by policy changes. The required interventions to be pursued to reverse the critical sectoral and institutional weaknesses, as identified, will therefore be complemented by policy changes introduced through budget support operations of the Bank and other donors. It will also be closely coordinated with the implementation of structural benchmark measures adopted by the Government under the IMF program. Behavioral changes will be triggered by a combination of policy measures that the Government intends to adopt and a problem driven approach to the implementation of this operation, including the MoF and key spending units.

II. Proposed Development Objectives

The project development objective (PDO) is to improve the budget management, financial control and reporting of the Government of Ghana.

III. Project Description

Component Name

Enhancing Budget Credibility

Comments (optional)

Component Name

Public Financial Management Systems and Control

Comments (optional)

Component Name

Reinforcing Financial Oversight and Accountability

Comments (optional)

Component Name

PFM Reform Coordination and Change Management

Comments (optional)

IV. Financing *(in USD Million)*

Total Project Cost:	45.00	Total Bank Financing:	45.00
Financing Gap:	0.00		

For Loans/Credits/Others	**Amount**
BORROWER/RECIPIENT	0.00
International Development Association (IDA)	45.00
Total	45.00

V. Implementation

This PFM project responds to the required reform actions that have been articulated in the PFM Reform Strategy document of the GoG, and the Government's objective of promoting efficiency and minimizing the administrative bottlenecks in the implementation of the PFM reforms. To this end, the institutional arrangements for the implementation of this project are being simplified and streamlined, based on the lessons learnt during the implementation of the GIFMIS project, to provide for the orderly coordination in the implementation of project activities and completion of deliverables.

The Ministry of Finance, under the leadership of the Minister, will be responsible for the overarching strategic coordination and oversight of the project. The specific details for the institutional and implementation arrangements to support the project are summarized below:

PFM Reforms Steering Committee: A PFM Reform Steering Committee (PFMRSC) – will be established to provide strategic guidance and oversight to the reform implementation process. This Steering Committee will help in addressing inter-ministerial issues pertaining to the entire PFM reform agenda of Government. It will also ensure the full engagement of all major organs of Government for effective control and management of public finances. It will be responsible for the overall policy coordination and policy guidelines for the project in particular, and for PFM reform in general. The PFMRSC will review, approve and cause the publication of annual progress reports on PFM reform at least two months after the end of the year.

PFM Reform Technical Committee: A PFM Reform Technical Committee (PFMRTC) will be established. The Technical Committee will review and evaluate all technical issues related to the implementation of PFM reform strategy and make recommendations to the PFMRSC for consideration. The work of this Committee will extend to activities of the existing PFM Sector Working Group where Development Partners are represented. For this project, membership of the PFMTC shall include, at the minimum, program managers (budget, HRMIS, internal audit, external audit, procurement reform, IFMIS, legislative oversight).

PFM Reform Coordination Unit: A PFMRCU will be established under the leadership of the Chief Director of the MoF. The key role of the PFMRCU will be to coordinate and consolidate key reform PFM reforms.

PFM Reform Project Management: A Project Director will be appointed who will be responsible for the overall project coordination and lead the project management team. In this regard, the day-to-day management of the project will be the responsibility of the Project Director who will report directly to the Chief Director. The Project Director will lead a project management team comprising, inter alia, procurement officers, financial management specialist, change management specialist, communication officer and a monitoring and evaluation specialist. The current GIFMIS Secretariat, enhanced to cover related activities under the wider reform initiative, will be transformed into the World Bank's PFM Reform Project Management Team. The functions of the project management team will be to coordinate the preparation of Annual Work Plans and Budgets (AWPBs), coordinate the preparation of progress reports for the consideration of the PFMRCU, preparation of annual Procurement Plans (PP), preparation of quarterly interim financial statements, preparation of annual project accounts, responsible for the timely conduct of annual audit of the project accounts and timely submission of same to the World Bank and to the PFMRCU. The Project Director will be the principal point of contact with the World Bank's Task Team Leader (TTL) for the resolution of Project issues on a day-by-day basis (including requests for no-objections).

Program Managers: Program managers will be appointed to oversee the implementation of project activities in each sub-component or theme of the project. The themes are: IFMIS; Budget; HRMIS; Payroll; Internal Audit; External Audit; Procurement Reforms and Legislative Oversight. Each Program Manager will be responsible for the implementation of activities under him/her and will be reporting to the Project Director.

Financial Management and Disbursement Arrangements. Financial reporting under the project will follow the current GoG Chart of Accounts and other reporting templates and formats as in use at the CAGD. The project is adopting the country systems, and it is expected that will generate adequate project-specific financial reports using GIFMIS. This should be possible since the sub consolidated fund account will be operated and managed by the Project Director. The financial statements and audit report shall be submitted to the IDA within 6 months of the end of the GoG's fiscal year.

In summary, the significant achievement in ongoing PFM reforms and the direction and pace of improvements have fostered confidence and will enable significant reliance on country systems in the areas of budgeting, budget execution (including accounting and internal controls), financial reporting, and external auditing; the project financial management arrangement will rely on these systems.

VI. Safeguard Policies (including public consultation)

Safeguard Policies Triggered by the Project	Yes	No
Environmental Assessment OP/BP 4.01		✕
Natural Habitats OP/BP 4.04		✕
Forests OP/BP 4.36		✕
Pest Management OP 4.09		✕
Physical Cultural Resources OP/BP 4.11		✕
Indigenous Peoples OP/BP 4.10		✕
Involuntary Resettlement OP/BP 4.12		✕
Safety of Dams OP/BP 4.37		✕
Projects on International Waterways OP/BP 7.50		✕
Projects in Disputed Areas OP/BP 7.60		✕

Comments (optional)

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