

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

Concept Stage | Date Prepared/Updated: 14-Sep-2018 | Report No: PIDISDSC25315



## **BASIC INFORMATION**

## A. Basic Project Data

Country India	Project ID P167350	Parent Project ID (if any)	Project Name Green National Highways Corridor Project (P167350)
Region SOUTH ASIA	Estimated Appraisal Date Feb 05, 2020	Estimated Board Date Mar 24, 2020	Practice Area (Lead) Transport & Digital Development
Financing Instrument Investment Project Financing	Borrower(s) Department of Economic Affairs	Implementing Agency Ministry of Road Transport and Highways	

**Proposed Development Objective(s)** 

The proposed Project Development Objective is to enhance the institutional capacity of Ministry of Road Transport and Highways in improving transport connectivity through adopting green and climate resilient construction methods for the National Highway network and implementing them in pilot sections of the Network.

## **PROJECT FINANCING DATA (US\$, Millions)**

#### SUMMARY

Total Project Cost	1,248.00
Total Financing	1,248.00
of which IBRD/IDA	500.00
Financing Gap	0.00

#### DETAILS

World Bank Group Financing	
International Bank for Reconstruction and Development (IBRD)	500.00
Non-World Bank Group Financing	
Counterpart Funding	748.00
Borrower	748.00



Environmental Assessment Category

A - Full Assessment

**Concept Review Decision** 

Track II-The review did authorize the preparation to continue

Other Decision (as needed)

### **B. Introduction and Context**

#### **Country Context**

1. India is the third largest economy in the world growing at an average rate of 7 percent for the past ten years. Wide-ranging macroeconomic, fiscal, tax and business environment reforms have buttressed this progress. India's large, vibrant and complex democracy has yielded broad political consensus around policies to drive inclusive growth and successive Indian Governments implemented several flagship programs to tackle some of the country's largest social challenges. The country's diverse drivers of growth and room for improvement in some areas underpin a robust growth trajectory going forward. The Government of India's (GoI) priorities are laid out in its 3-year action agenda (FY2017-19) and various national "missions" and flagship programs in support of key development objectives. One of the key priorities of the Government is to improve India's competitiveness through promoting skills development catalyzing entrepreneurship and strengthening connectivity, including multimodal transport logistics.

2. Investments in economic infrastructure services will be critical to sustain the growth momentum. The transport sector contributes about 6.4% annually to India's Gross Domestic Product (GDP) and more than three-fourths of this contribution is through the road sector. The Gol's allocation for infrastructure, has almost doubled during 2012-2017. Central and state investments in roads and bridges have almost doubled from about \$71 billion in 2007-12 to about \$141 billion in 2012-17, comprising about 15 percent of overall estimated infrastructure investments. However, these investments would need to be complemented by related policy changes to bring in elements of logistics efficiency and climate resilient features in building, operating and using infrastructure assets<sup>1</sup>.

#### Sectoral and Institutional Context

3. **Road Network and Sector Management.** India's road network of 5.48 million kilometers is the second largest in the world and the densest<sup>2</sup> and carries 65 percent of freight traffic and 85 percent of passenger traffic. It comprises of the primary network of 116,000 km of National Highways (NH), the secondary network of 160,000 km of State Highways (SH) 4and Major and Other District Roads (MDR & ODR), and a tertiary network of Rural Roads. The responsibility for planning,

<sup>&</sup>lt;sup>1</sup> As also pointed out in the India Transport Report, Moving India to 2032, National Transport Development Policy Committee Report, 2014

<sup>&</sup>lt;sup>2</sup> At 1.66 km/sq km of area, which is higher than that of USA, China, Japan and Russia



construction and maintenance of the primary network lies with the central Ministry of Road Transport and Highways (MoRTH). The MoRTH also formulates national policies and legislation governing road transport. The secondary network falls under the purview of the state governments and is managed by the respective state Public Works Departments (PWD) and other local agencies. The rural road network is managed by the Ministry of Rural Development.

4. In the last sixty years, the vehicle population grew at a Compound Annual Growth Rate (CAGR) of 10.8 percent putting pressure on the road network. The current passenger traffic is 12,000 Billion passenger-kilometer (BPKM) and it is projected to grow at an annual rate of 15 percent and become 168,000 BPKM by 2032. The current freight traffic is 2,000 Billion ton-kilometer (BTKM) and it is projected to grow at an annual rate of 9.7 percent and become 13,000 BTKM by 2032. In contrast with these growth rates, the NH network, which comprise only 2 percent of the total road network but carries about 40 percent of the road traffic, has grown at a rate of only 2.2 percent over the last sixty years and about 40 percent of the network is in poor condition. Similarly, SH form only 3 percent of the total road network and carry about 40 percent of total road traffic but grew by only 3.2 percent in the last sixty years and about 90,000 km of SH are only single lane (3.5m wide) roads.

5. **National Highways Development Program (NHDP).** In 1998, the Gol launched the NHDP covering 56,000 km of NH for development, spread across 7 phases. It is the biggest program (of value about \$50 billion) so far taken up by the MoRTH primarily through the National Highways Authority of India (NHAI), an independent entity under the aegis of the MoRTH. It also consisted of four/six laning of the Golden Quadrilateral (the highways connecting the four metros of Delhi, Mumbai, Chennai and Kolkata) and the North-South and East-West Corridors. As of March 2018, development of 30,000 km of NH has been completed, another 5,000 km of NH are close to completion and 6,400 km of NH are under implementation. The success of this program is attributed to the planning and programmatic approach, funding structure and institutional set up. It primarily relied on mobilization of additional revenues from tolls and from a levy on motor fuel (ring fenced into a non-lapsable Central Road Fund) and benefited from improved contracting modes for construction and maintenance such as Build-Operate-Transfer (BOT) Concessions and Engineering-Procurement-Construction (EPC), for efficient and timely delivery of road services. Adoption of these composite contracts for construction and long-term maintenance led to good quality network and asset management. It also accessed finances from other resources (though not in huge amounts) such as long-term capital from the Insurance sector, market borrowing by issuing Bonds, securitization of built assets etc.

6. **Non-NHDP Network.** The NH network that is not covered under the NHDP is called the Non-NHDP network. Most of the roads that form this network are of poor quality and capacity (single/intermediate/two-lane width) and thereby present unsafe and poor traveling conditions. In the recent years, the Gol has launched some specific programs to develop these roads as these connect the hinterland of the country and are key to the government's objective of equitable and inclusive growth. These programs include the 'Special Accelerated Development Program for the North-East' and the 'Special Program for Development of Roads in Left Wing Extremism Affected Areas'. The non-NHDP network is managed by the MoRTH, which delegated construction and maintenance of the roads to the National Highways Wings/Divisions of the State PWDs. The regional offices of MoRTH oversee these works managed by the State PWDs and are responsible for their financial execution (payment of invoices for consultant services or civil works contractors). Unlike the NHDP network, most part of the Non-NHDP network is maintained through separate annual maintenance contracts. Because of the addition of a substantial number of former SHs to the NH network the gap between resources available and required for maintenance increased, thus contributing to poor maintenance and riding quality of the non-NHDP network. The MoRTH is partly addressing this through adoption of integrated Engineering-Procurement-Construction lumpsum contracts along



with 5-years of performance-based maintenance for any rehabilitation/upgrading works undertaken in the non-NHDP network.

7. **Other Agencies in the Institutional Structure for Road Sector Management.** Apart from the NHAI and the State PWDs, the National Highways and Infrastructure Development Corporation (NHIDCL) is another implementing agency of the MoRTH. It is a fully owned company of the MoRTH and works on National Highways and Strategic Roads including interconnecting roads in parts of the country which share international boundaries with neighboring countries. On the technical side, the Indian Roads Congress (IRC) works on codes and standard specifications related to highway engineering, the Central Road Research Institute (CRRI) is engaged in carrying out research and development projects on design, construction and maintenance of roads and runways, and the Indian Association of Highway Engineers (IAHE) is associated with training of personnel in the field of Highway Engineering.

8. **Road connectivity has improved, but efficient mobility and logistics remain a challenge.** Creation of infrastructure to meet the burgeoning transport demand has resulted in improved connectivity but a lot needs to be done for seamless movement of traffic and efficient movement of logistics. India has not been able to reap the benefits of reduced logistics cost which was expected to come out of infrastructure investments. The road network has several congested stretches, primarily because it is passing through several cities, and is not integrated well with other modes of transport resulting in choke points especially around cities and at main intersections. The cost of movement of logistics in India is one of the highest (about 14 percent of GDP as against about 8-9 percent in developed countries). An integrated approach based on enabling the seamless flow of freight and passengers through transport network needs to be built.

9. **Bharatmala Pariyojana Program launched by the Government**. Considering that the sector still faces major challenges in terms of efficient movement of goods, the MoRTH recently launched the Bharatmala Pariyojana Program (BPP) which aims to *enhance effectiveness of already built infrastructure, multi-modal integration, bridging infrastructure gaps for seamless movement, inclusiveness by connecting 550 districts through highway linkages, improvement of Logistics Performance Index (LPI) of the country, and creation of jobs*. It envisages development of about 26,000 km of economic corridors; 8,000 km of Inter-corridors; 7,500 km of Feeder Roads; 1,800 km of Expressways; 1,300 km of port-connectivity roads; 2,000 km of coastal roads; 2,000 km of international connectivity roads; 3,300 km of border roads; 28 ring roads; 35 logistic parks; and improvement of 66 congestion points and 125 choke points. Phase 1 of this program, which is to develop 24,800 km of these highways in the next five years at a cost of \$108 billion, has already been approved by the government and MoRTH has started its implementation.

10. **Ensuring development of a greener transport infrastructure is a must.** Connectivity and efficiency are not the only requirements a transport network operation must fulfil. The third requirement is that of managing the 'externalities', i.e. the collateral damage suffered by the society or the cost imposed on it because of development and operation of the road network. The externalities, which are difficult to be quantitatively estimated, are health hazards (e.g. due to pollution), short and long-term effects of environmental degradation (e.g. depletion of natural resources) and adverse socio-economic impacts. Transport sector contributes 13 percent of global Green House Gas (GHG) emissions and three-fourths of transport-related emissions are from road traffic.<sup>3</sup> With an expanding NH network, it is expected that the emissions because of construction and maintenance activities would continue to rise. It will be critical to ensure that

<sup>&</sup>lt;sup>3</sup> International Energy Agency (IEA), World Energy Outlook



these emissions are limited by adopting construction and maintenance practices/ technologies/materials that are green i.e. resource efficient and low in terms of carbon footprint.

11. Pavements are still designed traditionally, without the use of alternate materials. Consequently, natural resources required for road construction such as soil, aggregates and sand are becoming scarce – and increasingly being brought in over large distances from the construction site, leading to spiraling construction costs. Given its scale, the BPP would only exacerbate these issues across the country. The externalities associated with these could be minimized by use of local and marginal materials and industrial byproducts and green technologies by appropriately integrating them into the design of pavements and embankments.

12. The MoRTH has launched a National Green Highways Mission (NGHM) following the promulgation of 'Green Highways Policy' in September 2015. The mission's objectives include developing a systematic framework for integrated green corridor development along NHs and building resilient ecosystems in form of green corridors for combating climate change effects through GHG sequestration. The Gol plans to carry out plantation along the NHs with participation of the local communities, farmers, NGOs, private sector, government agencies and Forest Departments (state level).

13. The Gol is also working on promoting efficient transport services (public transport system, urban transport improvements including regulatory and institutional framework and creation of funding sources) and vehicle and fuel efficiency (electric vehicles, clean and alternate fuels for transport).

14. India is highly vulnerable to climate change risks and successive, increasingly frequent, extreme climate-related events have disrupted economic activity. India is the 6th most vulnerable nation to climate change impacts, according to a risk index released at COP23 by Berlin-based NGO Germanwatch. It is important to ensure that the transport infrastructure that is created is resilient to the impacts of disasters and climate change induced extreme events. Weaknesses in engineering designs, construction quality and inadequate maintenance of the existing road network exacerbate the impact of these events. Unless these aspects are addressed through appropriate infrastructure planning and engineering design in the on-going/new highway programs of the Gol, roads and highway infrastructure stand an increasing risk of losses and damages from these future weather-related events and disasters. It may be useful to pilot construction of such climate resilient roads along with the use of new materials or technology and monitor the performance so that these aspects can then be mainstreamed into road construction.

15. **Road Safety Challenges:** Road accidents and fatalities in India are the highest in the world. According to MoRTH's road accident figures (year 2016), 480 thousand accidents took place in the country (29.6 % on NH) in which 151 thousand people died (35 % on NH). The severity of accidents (i.e. the deaths per hundred accidents) is a cause of serious concern as it has increased from 21.6% to 31.4 % between 2005 and 2016. The total number of accidents has also grown by 10 per cent during this period (from 439 to 480 thousand). The Motor Vehicles (Amendment) Bill, 2016, that was passed in Lok Sabha in April 2017 and awaiting its clearance in the Rajya Sabha seeks to amend the Motor Vehicles Act, 1988 to address various issues around road safety. It proposed creation of a National Road Safety and Traffic Management Board (NRSTMB) as a lead agency, which will provide advice to the central and state governments on all aspects of road safety and traffic management. Through the ongoing Bank-funded National Highways Interconnectivity Improvement Project (NHIIP), the MoRTH is undertaking several measures which enhance its institutional capacity in addressing road safety challenges. These include updating the IRC's road safety codes and the Road Safety Audit Manual, development of a nation-wide comprehensive road crash database management system to record, report and analyze crashes and hand-



held devices for prompt and accurate recording of crashes, public awareness campaigns, and training and capacity building of several engineers of the MoRTH and State Public Works Departments in road safety audit and management through a center of excellence.

16. **Financing Challenges.** The Government's financing plan for implementation of Phase 1 of BPP costing \$108 billion in the next 5 years is heavily dependent on the allocations from the Central Road Fund (CRF) and Gross Budgetary Support (GBS). Every year, 41.5% of the accruals of the about \$12 billion into the CRF were being allocated to the MoRTH for development of highways (39% of CRF accruals since year 2016). However, since February 2018, the CRF has been replaced the Central Road and Infrastructure Fund (CRIF) and this fund is now available for 55 sub-sectors of infrastructure.

17. **Gender.** Women's participation in the India's transport sector is significantly lower than men (based on ILO data). Anecdotal evidence suggests the one of the key constraints facing women in this sector is the lack of technical and soft skills in the sector.

## Relationship to CPF

18. The operation would contribute to the achievement of preliminary focus areas and objectives4 of the Country Partnership Framework (CPF, 2018-2022), inter alia: promoting resource efficient growth, enhancing competitiveness and creating jobs and by investing in Human Capital. In particular, it would substantially contribute to the improvement of connectivity and logistics pillar of the CPF.

## C. Proposed Development Objective(s)

19. The proposed Project Development Objective (PDO) is to enhance the institutional capacity of Ministry of Road Transport and Highways in improving transport connectivity through adopting green and climate resilient construction methods for the National Highway network and implementing them in pilot sections of the Network. This PDO will be reviewed and modified if required during the course of preparation of the project.

## Key Results (From PCN)

20. The key indicators will include (a) achievement of resource efficiency in pilot sections, (b) incorporating green and climate resilient aspects in design and construction of highways, (c) enhancing institutional capacity in research and development, (d) reduction in travel time in pilot sections, (e) reduction in vehicle operating cost in pilot sections, and (f) no increase in fatalities on project highways. These will be reviewed and modified as required during the course of preparation of the project.

## **D. Concept Description**

21. The current title of the project will be reviewed and modified in line with the PDO if required during the course of preparation of the project. This operation is proposed to support the Gol's Bharatmala Pariyojana Program and ensure MORTH's institutional capacity is strengthened in developing transport corridors that are efficient, green and resilient.

## Component A: Institutional Capacity Enhancement Component (Total Cost: US\$ 18 million, including IBRD US\$ 15

<sup>&</sup>lt;sup>4</sup> WBG Country Partnership Framework for India (FY18-22); Supporting India's Transformation; Concept Note; November 18, 2017



**million):** The project will seek to enhance the institutional capacity of MoRTH to better manage the National Highway network through supporting specific intervention in five areas, viz., climate resilience, financing, governance, efficient logistic movement and skill development.

**Component B: Green Highway Corridor Improvement and Maintenance Component (Total Cost: US\$ 1,162 million, including IBRD US\$ 440 million)**: The project will seek to upgrade about 1,000 km of selected existing National Highways. These highways will be designed and implemented as corridors considering the aspects of multi-modal connectivity, removal of choke points and seamless movement of traffic. All these will include pilots demonstrating green aspects in planning, design and implementation and correspond to the most salient types of climate and disaster risks in the country.

**Component C: Road Safety Component (Total Cost: US\$ 50 million, including IBRD US\$ 30 million):** This component will help and support interventions for (a) operationalization and capacity building of the proposed lead agency i.e. the National Road Safety and Traffic Management Board, (b) improvement of road safety of the project highways through safety audits at design, construction and implementation stages, (c) mainstreaming road safety monitoring and evaluation systems, (d) continuing the road safety-related activities (database, updating codes and manuals, public awareness campaigns, capacity building, training) being undertaken under the ongoing NHIIP project, and (e) research and development and training.

**Component D: Research and Development Component (Total Cost: US\$ 18 million, including IBRD US\$ 15 million):** The project will seek to enhance the capacity of MoRTH to better incorporation of resilience features and improve efficiency in management of natural resources during construction of highways through supporting specific intervention in two areas, viz., research and development, and training.

#### SAFEGUARDS

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

The proposed project seeks to upgrade about 1,000 km of selected existing National Highways in the states of Rajasthan, Himachal Pradesh, West Bengal, Bihar, Uttar Pradesh and Andhra Pradesh and would include various pilots demonstrating green aspects in planning, design and implementation of road works. The proposed green roads approach would consider resource efficiency and sustainability measures from a menu of options such as pavement recycling, use of local materials, recycled aggregates, use of innovative materials, avenue plantations along the corridor for creating carbon sink, soil and water conservation and new/alternative technologies, as suited to local needs and challenges. Also the project intends to support capacity building initiatives and studies for further investment in four areas, viz., climate resilience, financing, efficient logistic movement and skill development.

The proposed sub-project roads are located across the said six states with varying geo-climatic conditions and are exposed to varying degrees of environmental risks. The environmental issues, including vulnerability to climate risks and the adaptive capacities to manage them also varies. Some of the proposed upgrading works are likely to be carried out in tribal dominated areas and through settlement sections.

#### **B. Borrower's Institutional Capacity for Safeguard Policies**

Towards delivering of environment and social policy and procedural requirements three levels of institutions - central, state, and sub-project/site level would be involved in the project. MoRTH will be the overall implementation agency and shall be responsible for preparing and implementing the project through Public Work Departments (national highway



division) at the state level. While MoRTH has the prior experience of implementing World Bank funded projects and its safeguards policies, it has to depend on state departments/divisions and consultants. The capacity of states and the performance of consultants varies substantially. In some cases, finding relevant expertise in an efficient and timely manner both for project preparation and for construction supervision during execution, was noted as an issue under the on-going project (NHIIP). Also, there were some slackness in the inter-departmental coordination with Forest, Wildlife, Pollution Control Board, Power, Water Supply, Revenue, Urban and Rural Local Bodies in the initial years of project execution.

Given the sensitization and capacity building carried out under the on-going project (NHIP), it is encouraging to see the positive transition in MoRTH's policy and focus on issues pertaining to environmental sustainability and safety in the last few years. This includes the initiatives taken through the National Green Highways Policy/Mission and support to several new technical codes (through IRC) promoting recycling, use of waste/by-products, resilience and other forms of environmental management, making these mainstream elements in road design and implementation.

### C. Environmental and Social Safeguards Specialists on the Team

Sangeeta Kumari, Social Specialist Neha Pravash Kumar Mishra, Environmental Specialist

### D. Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The direct, indirect and induced adverse impacts resulting from the widening of proposed sub-project roads may cause adverse environmental impacts in their area of influence. Potential adverse impacts may include: (i) felling of roadside trees; (ii) adverse impacts on water resources; (iii) impairment to or worsening of the local/regional drainage; (iv) construction phase impacts, including those related to camp site operation, material sources, worksite safety issues (including on occupational health), dust generation, and pollution from plants, machinery, vehicles and disposal of debris/other construction wastes; and (v) impact on common property resources and environmentally sensitive receptors (such as schools and health facilities) located along the road corridors from increased noise and air pollution during the construction and operation stages. On the positive side, the project also seeks to mainstream wherever feasible in the project highway designs, 'green roads' approach that would consider promoting resource efficiency and sustainability measures from a menu of options such as pavement



		recycling, use of local materials, recycled aggregates, use of innovative materials, plantations along the corridor, soil and water conservation and new/alternative technologies. In view of the project's potential impacts on the environment, the Bank's OP 4.01 on Environmental Assessment has been triggered, and the project is designated as Category A.
Performance Standards for Private Sector Activities OP/BP 4.03	No	The proposed project or its activities will not be designed, constructed, operated and/or owned, by a Private Entity, as defined under OP 4.03. More so, MoRTH, GoI (not a private entity) will be fully responsible for identifying, assessing and managing the environmental and social risks associated with the project. Therefore, OP 4.03 is not being triggered for this proposed operation.
Natural Habitats OP/BP 4.04	Yes	To avoid adverse environmental impacts on critical natural habitats and wildlife, the project would not finance roads in ecologically sensitive habitats such as sanctuaries or national parks. Environmental Screening Exercise will help in identification of such issues early-on in the project cycle. However, reserved/protected forest areas that may include natural habitats are likely to be found along/close to some proposed sub-projects. In some cases, wildlife crossing/movement outside of designated protected areas along/close to the road is a possibility that the environmental assessment tools will help in identifying and mitigating, if required.
Forests OP/BP 4.36	Yes	Some forest land diversion would be required to construct the road to a standard configuration. In most of the other cases, the road side/avenue plantation notified as 'protected', is likely to be affected in the process of road widening. However, the project is not likely to have a significant impact the health and quality of natural forests. The project would also seek to not impact the rights and welfare of people and their level of dependence upon the forests; or aim to bring about changes in the management, protection or utilization of natural forests.
Pest Management OP 4.09	TBD	OP 4.09 trigger will be assessed during preparation of the project based on the nature and scale of proposed tree plantations and softer landscaping works - such activities are likely to form a part of the project since



		the proposed plan includes promulgation of National Green Highways Policy, which has a thrust on tree plantation for creating carbon-sink and employment. In such a case, biological/environmental control methods is envisaged.
Physical Cultural Resources OP/BP 4.11	Yes	Implementation of sub-projects is likely to affect religious structures of local significance. Also, since civil works are involved, 'chance finds' at work sites is a likely impact that would have to be accounted and managed.
Indigenous Peoples OP/BP 4.10	Yes	Upgrading of roads may require to be undertaken in the Tribal dominated areas in the project states of Andhra Pradesh, Rajasthan and West Bengal.
Involuntary Resettlement OP/BP 4.12	Yes	Upgrading of 1000 km of project roads may require involuntary uptake of land and/or physical and economic displacement.
Safety of Dams OP/BP 4.37	No	OP 4.37 is not being triggered for this project as there is no construction of new dams or activities that are concerned with safe functioning of existing dams.
Projects on International Waterways OP/BP 7.50	No	OP 7.50 will not be triggered for this project as there are no interventions planned/proposed over or around an international waterway that could cause a potential conflict. There are also no activities that may affect the use or pollute such a waterway.
Projects in Disputed Areas OP/BP 7.60	No	OP 7.60 is not being triggered as the project is not proposed in any disputed area.

#### **E. Safeguard Preparation Plan**

Tentative target date for preparing the Appraisal Stage PID/ISDS

#### Jan 27, 2020

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 Environment Management Framework (EMF) and Resettlement Policy Framework (RPF) would be prepared to guide the preparation and implementation of further investments to be supported under the project. The draft documents are likely to be ready before/by July 31, 2019. Corridor specific Environment Impact Assessments (EIAs), Social Impact Assessments (SIAs) along with Environment Management Plans (EMPs), Resettlement Action Plans (RAPs) and Tribal and Vulnerable People Development Plans for the first set of sub-projects need to be initiated by December 2018 and completed before December 2019. The disclosure of the documents for the priority/first set of proposed investments would be undertaken before the planned Appraisal.



## CONTACT POINT

#### **World Bank**

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#### **Borrower/Client/Recipient**

Department of Economic Affairs

## **Implementing Agencies**

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## FOR MORE INFORMATION CONTACT

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#### APPROVAL

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