Project Information Document (PID)

Concept Stage | Date Prepared/Updated: 25-Jun-2020 | Report No: PIDC29215

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BASIC INFORMATION

A. Basic Project Data

| Country Uzbekistan | Project ID P173450 | Parent Project ID (if any) | Project Name Strengthening the Statistical System of Uzbekistan (P173450) |
|---|---|--|---|
| Region EUROPE AND CENTRAL ASIA | Estimated Appraisal Date Oct 01, 2020 | Estimated Board Date Jan 15, 2021 | Practice Area (Lead) Poverty and Equity |
| Financing Instrument Investment Project Financing | Borrower(s) The Ministry of Finance of Uzbekistan | Implementing Agency The National Statistical Committee of Uzbekistan | |

Proposed Development Objective(s)

The PDO is to strengthen the capacity of the National Statistical Committee to improve statistical production and enhance dissemination practices.

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

| Total Project Cost | 50.00 |
|--------------------|-------|
| Total Financing | 50.00 |
| of which IBRD/IDA | 50.00 |
| Financing Gap | 0.00 |

DETAILS

World Bank Group Financing

| International Development Association (IDA) | 50.00 |
|---|-------|
| IDA Credit | 50.00 |

Environmental and Social Risk Classification

Concept Review Decision

Moderate

Track II-The review did authorize the preparation to continue

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Other Decision (as needed)

B. Introduction and Context

Country Context

- 1. Uzbekistan is a lower-middle-income, mineral-rich, landlocked country with the largest population in Central Asia 34 million as of 2020. Uzbekistan has maintained high and stable economic growth rates above 6 percent over the past decade and has gradually diversified its economy. Coinciding with this economic growth, official poverty estimates have declined from 27.5 percent in 2001 to 11.4 percent in 2018. This has been accompanied by equity gains, with incomes of those in the bottom 40 percent of the national income distribution growing faster than those of the upper 60 percent over the period from 2008 to 2013. Uzbekistan's per capita gross national income rose from US\$ 560 in 2001 to US\$ 1800 in 2019. These gains, however, have relied largely on an economic model driven by the state's dominance in the economy and a limited private sector.
- 2. Uzbekistan is transforming the foundations of its economy and social contract. The ambitious reform agenda underway entails three major shifts: from central planning to a market economy; from state to private ownership; and from isolation to economic integration. Ordinary citizens have seen a large expansion of their economic opportunities and freedoms. The state is more closely in touch with, and is more responsive to, citizens' needs. But it is still early in the transition, success is not guaranteed, and many of the coming reforms are complex. Rising citizen aspirations risk overtaking the state's ability to deliver results quickly enough. A world economy in deep turmoil will also serve as a major test for the transition process. Uzbekistan has the necessary ingredients for a successful transition. The country is rich in endowments resourceful people and diverse natural capital. But for decades the country has struggled to reach its full economic potential and generate full employment.
- 3. In February 2017, the Government of Uzbekistan (GoU) approved a five-year Development Strategy for 2017-2021 (the Strategy). At the core of the Strategy is a broad market-oriented reform policy in the country's governance and all key areas of the economy. It represents a comprehensive, ambitious, and fast-paced national reform agenda, and emphasizes five governance related principles as essential to accelerating sustainable development including i) improving state and public administration, ii) further strengthening the role of the *Oliy Majlis* (parliament) iii) economic development and liberalization, iv) the development of the social sphere, and v) ensuring security, interethnic harmony and religious tolerance via the implementation of a balanced, mutually beneficial, constructive foreign policy. The government has also approved the Sustainable Development Goals (SDGs) and adopted 16 national goals that are in line with the national needs and to achieve them has established the coordination council and roadmap as articulated in the Strategy. The national Action Strategy with its annual Action Plans approved for each year is widely seen as providing a unique pathway to achieving the SDGs in Uzbekistan.
- 4. Uzbekistan has set ambitious goals within the Strategy with respect to gender equality, climate, and the environment. However, many challenges remain. The population looking for work but unable to find it is heavily concentrated among women. Female labor force participation is 28 percentage points below that of men nearly

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twice the average gap in high-income countries (15 pp) and much higher than in comparator countries such as Russia (10 pp) and neighboring Kazakhstan (12 pp). According to World Bank monitoring in the Listening to the Citizens of Uzbekistan project, an overwhelming majority of the population feels that generating employment among women is an urgent priority. Uzbekistan's natural resources - its largest source of wealth - are used inefficiently and unsustainably. While more recent official estimates are unavailable, work done in recent years to estimate energy usage and environmental degradation suggest that Adjusted Net Savings in Uzbekistan have remained negative. The impact of climate change on the economy is expected to be highest in agriculture, energy, and water resource management. Climate change could increase monthly maximum temperatures across Uzbekistan, heighten the variability of rainfall across different agroecological zones, and accelerate glacier melting, which could reduce water availability and river flow. Uzbekistan is also vulnerable to natural disasters and climate-related events that cause significant economic losses: earthquakes, floods, landslides, extreme heat, and droughts. It was estimated that the expected annual economic loss from natural disasters in Uzbekistan is US\$92 million (in absolute terms, it is the highest in Central Asia) or 0.20 percent of GDP. Earthquakes in Uzbekistan are among the major threats. Seismic risks are concentrated in the eastern part of the country and the Bukhara region in the southwest of the country. Although only 14.6 percent of Uzbekistan's territory is at very high seismic risk, over 50 percent of the population live in this area, and about 65 percent of GDP is created there. Tashkent ranks first among nine cities in Central Asia and Caucasus in terms of earthquake hazard and the percentage of population exposed to seismic risk.

Sectoral and Institutional Context

- 5. Strengthening the national statistical system is at the core of the national reform agenda. Government presently struggles with crucial data gaps that disrupt the preparation, implementation, and monitoring of strategic development priorities. Implementing these activities will bring even greater responsibility to the NSC and will require close coordination with other government institutions. Although the NSC maintains an elaborate data collection and reporting system with about 2474 permanent staff the methods, definitions, and approaches are often outdated and labor intensive. International engagement and cooperation in the area of statistics was severely limited until 2017, and many non-standard and incomparable approaches have been used in the interim. Thus, in many instances the information available to the authorities and the public is insufficient to assess the performance of the economy or the social outcomes of the population. The NSC currently performs only moderately well when benchmarked against to international standards, with a Statistical Capacity Indicators (SCI) score of 64.4 in 2019. To address these challenges, a Presidential Decree to improve official statistics¹ was issued in July 2017, directing the NSC to comprehensively modernize its systems. The National Strategy for the Development of Statistics (NSDS) was adopted in 2020 to meet this directive. The NSDS defines the main strategic directions as the following:
 - Improved coverage of key national indicators that are relevant for policy and decision-making
 - A stronger quality management, monitoring, and evaluation framework
 - Clear data dissemination policy and practice
 - A legal framework for statistics to maintain integrity and independence
 - Satisfying demand for official statistical information, expanding capacity, contributing to an informed society, and improving statistical awareness among users.

¹ Decree of the President of the Republic of Uzbekistan No. PP-3165

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- 6. The NSDS further identified both institutional and data gaps to be addressed. The main institutional gaps include (i) the lack of familiarity among staff regarding international best-practices, (ii) the lack of technical capacity for processing, analysis, and reporting using modern data management systems, (iii) the lack of independence in statistical producing and reporting, and (iv) low salaries combined with high staff turnover. The main data gaps include (i) the lack of a population and housing census, (ii) outdated household, farm, and employment surveys, (iii) the lack of an agricultural census, and (iv) the lack of a complete business registry/census. Furthermore, improved survey data on consumption, employment, and income are needed to produce high-quality estimates of poverty and other SGD indicators.
- 7. The National Statistical Committee (NSC) is the main official provider of statistics in Uzbekistan, but many activities require close cooperation with other agencies and data users. The statistical legal framework is defined in the 2002 law "On State Statistics". The law names the NSC alongside the Ministry of Finance and the Central Bank as the official statistics producers in the country. There are several other institutions that are secondary data producers, including the State Committee on Geodesics, the Ministry of Labor and Employment Relations, the Ministry of Economic Development and Poverty Reduction, the Ministry of Mahalla and Family Affairs, and the Ministry for the Development of Information Technologies and Communications. The NSC's openness to sharing data with the World Bank and other international partners over has greatly increased since 2017. However, public data dissemination remains severely limited and the NSC's website does not include a micro-data library. Such an accessible repository would ensure that high quality data are used by policy makers, businesses, entrepreneurs, investors, by development partners, and by citizens.

Relationship to CPF

8. The proposed statistical lending operation is aligned with the Country Partnership Framework for Uzbekistan 2016-2020 objectives and is expected to remain closely aligned with the upcoming CPF. In particular, the improved quality and accessibility of official data during the course of the project links to each of the focus areas (private sector growth and job creation, agricultural competitiveness, and public service delivery), which are all expected to benefit from improved official data. High quality information on the performance of the private sector, on job creation, and the quality of public services will all be strengthened in the context of the project, and the lack of these sources of information is identified as a key impediment in both the Systematic Country Diagnostic and the CPF. The crosscutting area of economic governance relies heavily on reliable data and access, as these are fundamental to informed citizens engagement and evidence-based policy making. The project also contributes generally to the World Bank's activities and operations in Uzbekistan. Improving national accounts will support responsible macro-fiscal management, and the proposed well-being monitoring system will contribute to the World Bank's poverty monitoring and social protection related activities. Sectoral statistics in agriculture, education, and health are central to effective implementation of World Bank-supported projects, while improving the population and demographic statistics in the country's first comprehensive census will systematically improve the quality of the statistical system and the capacity of the state for effective resource allocation.

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C. Proposed Development Objective(s)

The PDO is to strengthen the capacity of the National Statistical Committee to improve statistical production and enhance dissemination practices.

Key Results (From PCN)

- 9. The project will focus on strategic objectives identified in official decrees and included in the NSDS to strengthen the capacity of NSC. Activities to fill data gaps include first-time censuses, improved national accounts, new specialized surveys, improved administrative data, higher quality household and employment surveys, and improved registers. Revised data access policies, a micro-data library, and outreach to strengthen user demand will enhance dissemination practices. The NSC is the direct beneficiary of the project. Users of the statistics produced by the project will be indirect beneficiaries and include (i) planners and policy makers; (ii) the public, (iii) business and the private sector, (iv) researchers, associations, and academia; and (v) development partners.
- 10. The key aspects of the PDO are the strengthening of NSC's capacity, improving statistical production, and enhancing dissemination practices. Progress toward the PDO will be measured and monitored through the following indicators:
 - a. Strengthen capacity: increase in the Statistical Capacity Indicators (SCI) score²
 - b. **Statistical production:** Number of rounds of modern representative survey microdata published for public open access which enable disaggregation by gender.
 - c. **Statistical production:** Completion of comprehensive population, housing, agricultural, and business censuses which enable disaggregation of core statistics by gender.
 - d. **Dissemination:** Number of views or downloads of gender disaggregated statistical materials and microdatasets.
 - e. **Dissemination:** Number of resolved data gaps in reporting gender, disability, and national indicators to monitor the sustainable development goals.
- 11. The rationale of the PDO indicators is objectivity, measurability, and simplicity. The SCI score is an accepted international standard to measure statistical capacity and quality of statistical activities. The number of relevant surveys and censuses measures directly the progress in filling data gaps. The number of views or downloads reflects increased use of statistics and, thus, measures the impact of enhanced dissemination practices as well as civil engagement.
- 12. The following key outputs of the project will be monitored:
 - a. The number of staff who have completed training (disaggregated by gender)
 - b. The number of completed censuses
 - c. Integration and reporting of sector and administrative statistics from other official sources
 - d. Number of rounds of national and regional poverty estimates reported online

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² Please find more details at http://datatopics.worldbank.org/statisticalcapacity/files/Note.pdf. By this measure Uzbekistan has improved substantially, rising from 49 in 2016 to above 64 in 2019, but continues to underperform against other ECA countries (about 78 on average).

- e. Published materials and formal adoption on standards and classifications
- f. Completion of the an ICP price data collection round
- g. The number of stakeholder engagement events held
- h. The number of complaints or requests from data users resolved.
- i. Number of statistical reports available online (with key indicators disaggregated by gender)
- j. Number of nationally representative micro-datasets available online (with indicators disaggregated by gender).

D. Concept Description

Component 1: Institutional Reform and Capacity

13. The first project component will support preparations for revising statistical legislation and the organizational structure of the national statistical system. A quality management program will be introduced and coordination through existing bodies will be improved. A human management policy including a training program will be developed and implemented.

Subcomponent 1.1 Institutional Reform

14. An institutional review will provide the foundation for institutional reform. The institutional review will include an analysis of the organigram as well as a functional review and a human resources review. The results of the review will feed into a change strategy for the NSC complementing statistics regulations. The review will provide the basis for reviewing existing laws and regulations, updating job descriptions, and matching with available skill sets. The project will provide a platform for statistical coordination among government institutions and development partners. Coordination efforts will leverage existing institutions such as the National Statistics Council, which is currently composed of members from Government bodies, civil society, and trade unions. The platform will be used to discuss ongoing and planned activities related to statistics.

Subcomponent 1.2: Human Capacity

15. Based on a training needs review, the project will identify key trainings for the NSC's staff. Trainings will include on-the-job-trainings with shadow assignments, workshops, short-term courses, certifications, and potential twinning arrangements with statistical offices in other countries. Given the currently limited availability of such trainings in Uzbekistan, the project will also use statistical schools abroad on an as-needed basis. Under this subcomponent, the project will support a training on gender-relevant data collection methods that consider the local context, and social/cultural norms that may produce gender-based biases.

Component 2: Data Production

16. This component focuses on closing the most important data gaps identified in the NSDS. The component will support improvements to three types of data collection systems: survey-based, administrative, and censuses. Statistical production will be improved by thoroughly updating national accounts, improving the well-being monitoring system, supporting the implementation of a first population and housing census, improving agricultural

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production statistics, and improving statistical methods, standards, and registers. The resulting data will include new indicators to enable disaggregation among subpopulations including women/men, age groups, disability, and other groups. The project will support the expansion of existing indicators related to gender, as well as the development and introduction of new gender indicators. The indicators may include data on unpaid care work, property rights, educational sex-segregation, employment data in energy and infrastructure, and on decision-making processes and institutions (including mahalla, district, and regional leadership, activities, and performance).

Subcomponent 2.1: National Account Statistics and Business Census

- 17. Currently, national accounts are estimated based on incomplete data, missing informal sector data, and limited by quality concerns in some sectors. In addition, in-house technical capacity at the NSC for national accounts related activities is limited. The project will improve the NSC's capacity to produce national account statistics, close the main data gaps, and implement 2008 SNA/QNA and supporting statistics. The dual approach of building technical capacity and supporting data collection will improve the quality of national accounts and reliable quarterly GDP estimates.
- 18. The project subcomponent will support improvements and maintenance of the following data systems: (i) a new business census including company ownership, (ii) a business survey including details of company ownership the organization of state-owned enterprises (also required for calibration of the production price index), (iii) an informal sector survey, (iv) compilation of export and import price indexes, and (v) improved establishment and construction surveys. These sources will be used to complete missing information on construction, trade, hotels and restaurants, education, healthcare, and other personal services. Appropriate procedures will be developed for reconciling production and expenditure-based estimates of GDP.

Subcomponent 2.2: Wellbeing Monitoring System

- 19. This subcomponent will support the implementation of a comprehensive well-being monitoring system. This will include improving household surveys, community administrative data, consumer and producer price statistics, developing a data collection call-center, and participation in the upcoming International Comparisons Program (ICP) round.
- 20. This subcomponent will finance a comprehensive modernization of the Household Budget Survey (HBS). At present, the NSC continuously collects consumption and expenditure data in the annual HBS, which is the primary data source of information on levels of monetary wellbeing. The survey sample is designed to provide valid representativeness every year. The envisioned changes include transferring the mode of data collection to a computer assisted personal interview format, expanding the subject coverage to include additional measures of well-being and core SDG indicators, and increasing the size of the household sample. Adopting the tablet computer-based format is expected to considerably increase the speed of data collection and quality of the information obtained. A new sample design will (i) optimize the spatial allocation of the new household sample, and (ii) increase the total sample size to be quarterly representative at the regional level. Topic coverage will be expanded to include Washington Group data on disability; household income, expenditure, and consumption; education levels and activities; healthcare needs and related expenditure; and allow for full gender and age disaggregation for relevant measures of wellbeing. The NSC will make publicly available the anonymized datasets in the micro-data library. The NSC will also publish the statistical analysis of the data, with gender- and geographical-specific statistics for key indicators.

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- 21. This subcomponent will also finance (i) improving local data management systems for the "mahalla passport" database (ii) training of local administrators for the timely and accurate collection of mahalla-level data, (iii) ensure the integration of mahalla level passport statistics with the NSC statistical reporting. Such reporting will include mahalla-level administrative information from the single social register.
- 22. Finally, this subcomponent will update the price statistics and the continuous collection of national and regionally representative consumer and producer price statistics using electronic systems. Furthermore, as Uzbekistan is one of few countries in the world that has not participates in recent ICP³ rounds, this subcomponent will finance the preparation and implementation of one round of participation in the ICP process.

Subcomponent 2.3: Population and Housing Census

23. The planned population and housing census will provide detailed information on the demographic, social, economic and housing conditions of a country. This subcomponent will support preparation and implementation of the country's first population and housing census, planned for 2022. The subcomponent will: (i) prepare materials and conduct trainings for the operational staff of the census (interviewers, supervisors, clerical staff); (ii) finance procurement of necessary equipment for conducting the census, (iii) design dissemination materials that will be used to promote the participation of the population; (iv) develop a pilot and experimental censuses to test the material that will be used in the census and make the necessary adjustments, and (v) support analysis of the results and production of reports and related materials.

Subcomponent 2.4: Agricultural Production Monitoring System

24. There are many gaps in statistics for agricultural production despite the importance of the agricultural sector in Uzbekistan. No nationally representative agricultural survey has been conducted since independence. Statistics focus on agricultural production, while indicators on productivity and farm incomes are missing. To close this data gap, the project will support the rollout of an agricultural production monitoring system consisting of three components: (i) a continuous agricultural survey, (ii) continuous monitoring of agriculture statistics derived from administrative sources⁴ and (iii) a comprehensive agricultural census. The agricultural census will use data from the Population Census as a sampling frame and complete enumeration of all commercial farmers. Based on census data, follow-up sample surveys will monitor agricultural production and provide more detailed data on selected subsectors including horticulture, wheat, and cotton. The Ministry of Agriculture will be closely involved in the design of the monitoring system and indicators' methodology to align with in-country systems and ensure complementarity with existing routine data collection efforts and available administrative data.

Subcomponent 2.5: Methods, Standards, and Registers

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³ A periodic data collection effort that allows for comparable estimates of GDP, poverty, and other key indicators across countries

⁴ And inclusion of new statistical indicators that are the part of the recently approved Strategy for Agricultural Development 2020-2030 (which includes more than 50 indicators)

25. This subcomponent will improve registers, standards, classifications, frameworks, and metadata repositories. The activities will ensure that definitions are comprehensive and up to date. Classification and standards will be revised and modified to align with international best practices. Questionnaire design and sampling methods will be improved. A review will be conducted on the relevance and scope of gender disaggregation in official statistics, the selection of gender relevant topics, data source identification, a gender-focused review of definitions and concepts, and development or updates on survey instruments with respect to gender. Data management capacity for time series analysis, managing/using spatial data, and seasonal adjustment methods will be introduced.

Component 3: Improving Equipment and Dissemination

26. The project will fund an assessment and an upgrade of information and communication technologies (ICT) infrastructure to ensure efficient data collection, processing workflows, analysis, data archiving, and dissemination including the micro-data library. Dissemination practices will be improved by collecting user feedback, supporting open data access, implementing an open micro-data library, and producing analytical reports.

Subcomponent 3.1: Data Processing and Equipment

27. The objective of this subcomponent is to finance upgrades to the NSC's data center and to establish an integrated data processing system covering the complete data collection cycle. This process includes developing an integrated suite of software for creating survey frames, selecting samples, collecting data using digital devices, editing, imputing, aggregating and disseminating data. The information systems of the NSC will be further integrated with the databases of other data collecting agencies. Equipment and systems for digitizing paper-based archives will be procured, and the use of computer assisted personal interviews, computer assisted telephone interviews, computer assisted web interviews, and other modern data collection methods will be introduced. A call-center will be created to enable phone-based data collection, survey implementation monitoring, and to facilitate data quality control. This subcomponent also aims to assist the NSC in modernizing statistical infrastructure in the territorial offices. Office network facilities will be improved, and outdated equipment will be replaced where required. However, no civil works will be conducted within the project.

Subcomponent 3.2: Analysis and Dissemination

- 28. This subcomponent will support additional analytical activities in the form of a data note for each monitoring system, and support for improving the Annual Statistical Yearbook. On the basis of the modernized data collection approaches, the NSC will regularly produce and monitor key indicators of well-being, including poverty measures and other SDG indicators. This subcomponent will finance NSC contributions to updated official measures of poverty, the labor market, consumption, and incomes, and will support the process and workflow to report these statistics on the NSC's official website on a quarterly basis. In addition, led by the relevant ministries, well-being data will be used to prepare an annual report on poverty and well-being in Uzbekistan.
- 29. There is no well-established tradition in Uzbekistan in determining user requirements for statistics, especially the requirements of non-government users. This subcomponent will support activities to improve communications with both users and providers. User consultation will be conducted through topic specific focus groups.

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Dissemination practices will be improved with regular press releases and media conferences. A web-portal will be introduced to solicit feedback from users, and an advance statistical release calendar will be created and maintained. Specifically, the following will be developed in the context of the project:

- An online user-dialogue and feedback platform facilitating exchange and providing an interface between the NSC and users of the statistics to share their needs and ideas and to constantly improve statistical coordination;
- Periodic online citizen report cards on a rolling basis on the NSC website and through mobile applications to
 inform NSC activities and to measure satisfaction of users of the statistics in regard to key dimensions of
 statistical data services (e.g. relevance and accessibility of statistical products and services, transparency of the
 NSC as an institution, effectiveness of the NSC engagement with users);
- Annual public townhalls (regarding social distancing measures these can also be held virtually) disseminating
 information on project progress, the results of the dialogue and feedback platforms and surveys and any
 corrective action which was taken to address issues raised.
- 30. Finally, open access policies for anonymized microdata will be adopted. Open access to micro-data contributes to transparency, supports evidence-based policy analysis, and also creates user demand for high-quality statistics. In turn, this helps statistics producers justify government budget allocations to sustain a modern statistical system. This subcomponent will support the implementation and maintenance of a new micro-data library to enable open access to data users.

Component 4: Project Management

31. Project planning and management will be through technical advisory services, training, operation costs, and the acquisition of goods. Successful implementation of the project requires a dedicated Project Management Unit (PMU) staffed with a project coordinator as well as specialists in financial management (FM), procurement, ICT, human resources, and monitoring and evaluation. This project component will provide funding for those functions and their implementation. The unit will be supported by international consultants, if needed, with a focus on building the capacity of the unit over the initial phase of the project.

2. Overall Risk and Explanation

- 32. The overall project risk is rated Moderate. The macroeconomic risk is rated Moderate based on an assessment of the impact of the outbreak of COVID-19 and global economic environment on the project. The Moderate rating of macroeconomic risk results from the fact the government maintains a substantial fiscal buffer, and several of the activities presented in this project will be fully financed by the World Bank loan. Environmental and social risk is rated Moderate. Project FM risk is defined to be Substantial at the PCN stage as there is no PMU created yet thus it is not possible to assess FM arrangements and capacities. The project is subject to Moderate political and governance risks. Finally, the fiduciary risk is rated substantial.
- 33. The project identifies a substantial risk regarding institutional capacity for implementation at PCN stage. At present, no PMU exists to be assessed. However, known risk factors include the NSC's limited implementation capacity due to a lack of World Bank projects experience. Therefore, the project management component includes

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funds to ensure that the head of the PMU has sufficient support to manage the project successfully. Uncertain sustainability of the project results after project closure also contributes to this rating. The risk is mitigated by project activities to strengthen user demand for statistics in Uzbekistan to support requests for government funding for statistics.

- 34. The project's Environmental Risk is rated Low, Social Risk rated Moderate, and overall E&S risk as Moderate. The project does not support any civil works and environmental risks are confined to small rehabilitation issues for the installation of new equipment, and disposal/recycling of electronic waste when equipment is replaced. These are easily mitigatable with a waste management plan and an environmental and social management plan checklist, respectively. On the social front, key issues relate to collection and collation of data; ensuring its accuracy; meaningful analysis and interpretation; sharing of the data/information; and data privacy safeguards. Data collection and generation should allow for disaggregation by gender and among vulnerable groups, significantly closing data gaps. These risks will need to be addressed as a part of the overall project design. One mitigation approach could include publishing anonymized micro-data and administrative data files to allow third-party analysis and verification. The preparation of the POM will include an LMP as required under ESS2.
- 35. As there is presently no PMU in the NSC, a procurement assessment has not been conducted as of the PCN stage. However, known risks include little prior experience in managing World Bank funds. These risks can be mitigated by an early recruitment of a qualified and experienced procurement specialist in the project preparation phase. Furthermore, the risk will be mitigated by the preparation of the Financial Procedures Manual, simplified guidelines, installation of automated accounting software, hiring of internal auditors to verify project expenditures; and remedial actions for any irregularities observed.

| Legal Operational Policies | Triggered? | |
|--|------------|--|
| Projects on International Waterways OP 7.50 | No | |
| Projects in Disputed Areas OP 7.60 | No | |
| Summary of Screening of Environmental and Social Risks and Impacts | | |

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