



# Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

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Appraisal Stage | Date Prepared/Updated: 21-Oct-2019 | Report No: PIDISDSA26707



**BASIC INFORMATION**

**A. Basic Project Data**

Country Nepal	Project ID P170565	Project Name Second Additional Financing Earthquake Housing Reconstruction Project	Parent Project ID (if any) P155969
Parent Project Name Earthquake Housing Reconstruction Project	Region SOUTH ASIA	Estimated Appraisal Date 14-Oct-2019	Estimated Board Date 05-Dec-2019
Practice Area (Lead) Urban, Resilience and Land	Financing Instrument Investment Project Financing	Borrower(s) Ministry of Finance	Implementing Agency National Reconstruction Authority

Proposed Development Objective(s) Parent

The Project Development Objective (PDO) is to restore affected houses with multi-hazard resistant core housing units in target areas and to enhance the government's ability to improve long-term disaster resilience.

Components

- Housing Reconstruction
- Disaster Risk Management Systems
- Project Implementation Support
- Contingency Emergency Response

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

**SUMMARY**

<b>Total Project Cost</b>	359.00
<b>Total Financing</b>	359.00
<b>of which IBRD/IDA</b>	300.00
<b>Financing Gap</b>	0.00

**DETAILS**

**World Bank Group Financing**



International Development Association (IDA)	300.00
IDA Credit	300.00

**Non-World Bank Group Financing**

Counterpart Funding	59.00
Borrower/Recipient	59.00

Environmental Assessment Category

B-Partial Assessment

Decision

The review did authorize the team to appraise and negotiate

**B. Introduction and Context**

Country Context

Nepal is one of the world’s most disaster and climate vulnerable countries. An estimated 80 percent area of the country is at risk from multiple hazards, with the vast majority of the inhabiting high-risk prone areas. Its per capita income is estimated at USD 730 and about 25 percent of its population lives below the poverty line. In last 50 years (from 1971 to 2015), disasters claimed lives of 40,000 people, injured more than 75,000 and affected 3 million people. The resilient development of Nepal is seriously hindered by these disasters and climate risks. The impact of the 2015 Gorkha earthquake and its major aftershocks are estimated at 35 percent of GDP with recovery needs of about USD 7 billion. Every year, intense monsoon rainfall causes floods in many parts of the country. The country was severely affected by monsoon floods in year 2017 that impacted more than 30 districts. So far<sup>1</sup>, 2019’s monsoon floods, landslides and heavy rainfall have affected 67 districts, causing loss of 113 lives, disappearance of 34 person and damage to 67,413 households<sup>2</sup>. In some cases, debris from landslides blocks rivers and when released suddenly, causes disastrous inundation downstream. The increased instability and intensity of geological and climate events on top of the fragile landscape is worsening landslide risks. Nepal is also highly vulnerable to Glacier Lake Outburst Floods (GLOFs). Glacier thinning and retreat in the Himalayas has resulted in the inherently unstable process of formation of new glacial lakes and the enlargement of existing ones. Recent surveys indicate that many glacial lakes in the country are expanding at a considerable rate, increasing the risk of sudden outbursts. For Nepal to continue to make progress on its key development indicators, it is critical to invest in resilient recovery and reconstruction post-earthquakes to avoid creating new risks and strengthen disaster preparedness and response capacity to manage the disaster risks.

Sectoral and Institutional Context

Following the devastating earthquakes occurred in April 25, 2015 and May 12, 2015, Government of Nepal (GoN) established the National Reconstruction Authority in December 2015 to lead and manage recovery, rehabilitation and

<sup>1</sup> As of July 26, 2019

<sup>2</sup> National Emergency Operation Centre



reconstruction of affected infrastructures. The mandates of NRA are to: reconstruct, retrofit and restore damaged infrastructure and houses in disaster resilient manner following the Build Back Better principle and with the overall aim of building resilient communities; develop opportunities for economic growth and livelihood; undertake research and studies on the Science of earthquakes and their impact; and manage relocation and resettlement of vulnerable and displaced communities. The NRA's roles and responsibilities include: identifying priorities for reconstruction based on damage assessments; allocating reconstruction funds based on agreed priorities; approve plan and budget for the allocated funds; relocation and rehabilitation; collaborating with key stakeholders; building implementation capacity; developing and implementing programs related to reconstruction and rehabilitation of infrastructures related to education, health, agriculture, cultural heritage and industry; monitoring and quality control; and ensuring accountability and transparency. The Project and proposed additional financing will compliment these efforts and lay the groundwork for a longer-term program to strengthen disaster and climate resilience in Nepal.

### C. Proposed Development Objective(s)

#### Original PDO

The Project Development Objective (PDO) is to restore affected houses with multi-hazard resistant core housing units in targeted areas and to enhance the government's ability to improve long-term disaster resilience.

#### Current PDO

##### Key Results

- (i) increased number of beneficiary households; and
- (ii) enhanced implementation capacity.

### D. Project Description

The proposed AF operation will finance Housing Grants to eligible beneficiaries and Implementation Support to cover the incremental operating cost. Funds will be allocated to components as follows:

**Component 1. Housing Reconstruction (US\$ 295 million plus USD 59 million counterpart funding):** The component will finance the provision of housing grants for reconstruction of approximately 129,000 multi-hazard resilient core housing units. Eligible households, upon signing of participation agreement with the Government of Nepal, receive housing grant of Nepalese Rupees (NPR) 300,000 in different tranches. First tranche of NPR 50,000 is released upon beneficiaries' signing of participation agreement as an advance; whereas second tranche of NPR 150,000 is released upon completion of house up to plinth level after ensuring compliance with the reconstruction guidelines and third installment of NPR 100,000 is released upon completion of house up to roof-band level after ensuring compliance with the reconstruction guidelines. All these payments are transferred to the bank accounts of respective beneficiaries.

**Component 3. Project Implementation Support (US\$ 5 million):** This component will finance: (i) Technical Assistance (TA); and (ii) the operation of the Project Management Unit (PMU), the Central Level Project Implementing Units (CLPIUs), the District Level Project Implementation Units (DL-PIUs) and Local Government Level teams. The technical assistance includes the technical input to beneficiary households on multi-hazard



resilient parameters and inspection of houses to ensure the reconstruction is carried-out as per the prescribed guidelines. The TA also includes provision of social mobilization support to the beneficiary households.

## **E. Implementation**

### **Institutional and Implementation Arrangements**

There is no change in the implementation arrangements except for streamlining financial management. Like original project, AF will also be managed and coordinated by Project Management Unit (PMU) and implemented by Central Level Project Implementation Units (CLPIU) 'Grant Management and Local Infrastructure' (GMALI) and Building. The CLPIU-GMALI will be responsible for provision of housing grants and the CLPIU-Building will be responsible for providing technical assistance and input and conducting inspections of houses to ensure compliance to the reconstruction guidelines. Both CLPIUs will have District Level Project Implementation Units (DLPIU) in all the earthquake affected districts. With country's transition to federalism, the project activities are being implemented in close coordination with newly formed local governments. NRA is in the process of recruiting social mobilizers, senior engineers and mobile masons to provide socio-technical assistance to those beneficiaries, who have not yet been able to start reconstruction and who have aborted the process midway for some reason. The lack of adequate socio-technical assistance has been flagged continuously by different development partners including World Bank, but NRA has not yet been able to procure and mobilize the team in the field. The Socio-technical Assistance team will be deployed at Local Government level and will provide support to project beneficiaries including most vulnerable in coordination with local level representatives.

## **F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)**

Project area lies in the middle hills and the mountains. The area also lie between the two active tectonic contact—main boundary thrust (MBT) and main central thrust (MCT) which are still active and landslides and soil are frequent along these faults. Furthermore, increasing population and landuse intensification have resulted in conversion of primary forests, which has left the areas more fragile and vulnerable. Tropical, Sub-tropical and temperate type of forest exists in the project districts which are mainly managed by community forest groups. The Earthquake of April 25, 2015 and its aftershocks have formed cracks and scars in the watershed of the project area which will be susceptible to landslides with the onset of the monsoon. There are three protected areas in the project district; viz Manaslu Conservation Area, Langtang National Park, , and Gaurishankar Conservation Area. People live in the buffer zones of these protected areas. These areas are also popular trekking destinations. Besides the protected areas, there are number of community managed forests and government managed forests in the project areas. The community managed forests in the buffer zones and outside the buffer zones are important in meeting the firewood, timber and fodder needs of the respective communities. Aavalanche followed by the earthquakes killed many tourists and local people. Risk of Glacial Lake Outburst Flood (GLOF) has increased after the earthquake. Majors rivers like Bhotekoshi, Trishuli, Marsayndhi and Sunkoshi drains some of these districts. During the parent project, disease vector (mosquitoes) breeding has not been reported as an issue. There has been no need for vector control in the individual house construction sites and community, and hence,



use of chemicals for vector control in the individual house construction site is not-anticipated. There is a significant presence of disadvantaged and marginalized groups in the earthquake-affected area who are at risk of further marginalization and deprivation with respect to the GoN support provided for reconstruction and rebuilding. Whilst some of the disadvantaged groups include indigenous peoples, other groups including Dalits, people with disabilities, female-headed households, the elderly and orphans are considered equally vulnerable and disadvantaged.

**G. Environmental and Social Safeguards Specialists on the Team**

Drona Raj Ghimire, Environmental Specialist  
Caroline Mary Sage, Social Specialist

**SAFEGUARD POLICIES THAT MIGHT APPLY**

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The impacts related to Environmental Assessment (OP 4.01) include small scale construction wastes from owner-build houses, erosions, pressure on water source due to increased need of water for construction, stone and sand collection, debris from house demolition, etc. The used mitigation measures include re-use of materials (e.g. stone, sand, etc) for construction, avoid individual quarry in risky-spots, maintenance/ upgrading of local taps and community water-supply, etc.
Performance Standards for Private Sector Activities OP/BP 4.03	No	Not Applicable.
Natural Habitats OP/BP 4.04	Yes	In the parent project, no impact has been reported relating to the Natural Habitat. However, this is triggered in the AF as a precautionary measures, and in case by case basis, will continue to review and assess the risks and impacts.
Forests OP/BP 4.36	Yes	Impacts on the Forest arise from the need for construction timber. Community forests are one of the source of construction timber, among other sources (e.g. purchase from market, timbre supplied by the government etc). Project promoted re-use of the timber from the damaged houses, and use timber from sources other than the forests, as far as



		possible. In order to compensate, in case by case basis, loss or degradation of forests, project supported the community for plantation and conservation of the community forests.
Pest Management OP 4.09	No	Use of chemicals is not expected. The possibility of disease vector ( e.g. mosquitoes) breeding and spreading from debris and wastes is also related to the altitude of the sites (lower altitude, where weather is warm, may suit mosquitoes breeding for example). During the parent project, disease vector (mosquitoes) breeding has not been reported as an issue, and there has been no need for vector control in the individual house construction sites and community. Hence, use of chemicals for vector control in the individual house construction site is not-anticipated. However, if such risk is assessed in any individual case in the AF, mitigation measures will be identified and implemented under OP 4.01.
Physical Cultural Resources OP/BP 4.11	Yes	No impacts has been reported in the PCR (OP 4.11) as of now in the parent project. This policy is triggered in the AF for precautionary purpose.
Indigenous Peoples OP/BP 4.10	Yes	The project areas is comprised of Indigenous Peoples communities and other vulnerable groups such as Dalits, women-headed households. Thus OP 4.10 on Indigenous Peoples is triggered.
Involuntary Resettlement OP/BP 4.12	Yes	Screening exercise done in parent projects indicate that land acquisition and resettlement are unlikely or limited. The policy is triggered in the AF for precautionary purpose. Resettlement Policy Framework (RPF) has been prepared for the project. It will be the guiding document in resettlement planning.
Safety of Dams OP/BP 4.37	No	Not Applicable.
Projects on International Waterways OP/BP 7.50	No	Not Applicable.
Projects in Disputed Areas OP/BP 7.60	No	Not Applicable.



## KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

### A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

In terms of environmental safeguards issues, it is expected that the need for timber for construction of houses/shelters will put pressure on the forests, and buffer zones of the protected areas, which lie in the vicinity of the affected districts. The communities, under the management plan approved by the District Forest Office, may access their respective community managed forests for timber, fodder and firewood needs. Impacts on these forests may be mitigated through strengthening the community forest management and promotion of good environmental practices in housing. The forest land cannot be used for building residential house. The project area is fragile and susceptible to landslides and erosion. Extraction of construction materials (timber, sand, gravel, aggregates, clay etc.) is likely to increase the vulnerability of landslides and soil erosion. Impact on environmental health and sanitation is possible from water/air pollution that may be caused by debris generated by demolition. However, the project is also expected to contribute positively by supporting the concept of “build back better” helping communities become more resilient in the long-run. Potential positive impacts can be anticipated through the promotion of environmental good practices (e.g. alternative energy, smokeless stove, solar power, rain-water harvesting, water recycling, re-use of salvaged timber/materials, sanitation etc) during design and construction of houses, reducing the deterioration of the environment, and increasing the resilience of eco-systems in an area, if relevant and necessary, through afforestation programs, slope stabilization through re-vegetation, and bio-engineering activities. There is also a high potential for disaster risk reduction through the adoption of new and resilient engineering technologies for constructing rural homes. Use of chemicals is not expected. During the parent project, disease vector (mosquitoes) breeding has not been reported as an issue. There has been no need for vector control in the individual house construction sites and community, and hence, use of chemicals for vector control in the individual house construction site is not-anticipated. The disease vector ( e.g. mosquitoes) breeding and spreading is related to debris and wastes, and also related to the altitude of the sites (lower altitude, where weather is warm, may suit mosquitoes breeding for example). However, if such risk is assessed in any individual case in the AF, mitigation measures will be identified and implemented under Environmental Assessment (OP 4.01).

From the social perspective, the project will bring positive benefits to beneficiaries, including poor, women, indigenous peoples (IPs), Dalits, etc., in the form of housing grants support and technical and capacity building activities during construction. However, potential social risks and impacts may include 1) Resettlement impact due to limited relocation of settlements/households that are no longer habitable due to ground fissures and high risks of seismic and landslide hazards; 2) Inadequate consultations with vulnerable groups including IPs, Women, Dalits and other marginalized groups leading to their low participation in project activities; 3) Ineffective mechanisms for benefit targeting and information dissemination leading to exclusion of marginalized groups from project benefits.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:  
None.

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

The current project approach seeks to minimize future vulnerability of households to seismic and other hazards and to promote resilience and sustainability by “building back better”. During implementation, various alternatives for each individual or block house/shelter related to siting (avoiding landslide prone areas, avoiding forests, etc), designs (to





incorporate relevant environmental good practices such as earthquake resistance, improved smokeless stoves, rainwater harvesting, alternative energy, etc), and construction materials (to ensure environmentally appropriate sourcing of timber, sand, clay, concrete blocks etc) and construction management (such as to ensure safe disposal of unusable debris at site, avoid impacts to cultural property, minimize health and safety risks, etc) will be identified and considered through subproject planning and implementation.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

The ESMF has been prepared to guide the identification of possible social and environmental issues; develop mechanisms to comply with relevant GoN's and World Bank's policy requirements; and lay out project's approach and procedures to mitigate the environmental and social impacts. The ESMF contains institutional and implementation arrangements, the monitoring framework, and the capacity building needs for effective implementation of the ESMF.

Environmental and Social Management Framework (ESMF) prepared for the original project has been revised based on the experiences and simplifying the procedure and making it proportionate to the environmental and social impacts and risks. The main revisions in the safeguard tools/ approach, based on the experiences of the parent project include: Preparation of Project Level ESMP instead of settlement level Screening and ESMP; Review and Verification of project level ESMP at the Municipality level; preparation of Site-specific ESMP in special cases if Municipality level verification show that there are cases not covered by the Project level ESMP; and supervision and monitoring of ESMP implementation in municipality. The Project will not support community relocation, integrated settlement development, urban areas, reconstruction of cultural heritage sites and other physical and social infrastructure and services. The revised ESMF requires preparation of site-specific ESMPs in special cases. These special cases were identified based on the screening and consultation done in more than 900 settlements in the project area. The special cases for EHRP are: safety issues of existing temporary structures in use, water availability for reconstruction, slope stability and landslides and involuntary resettlement. Project level ESMP has also identified labor issues including OHS and recommended the mitigation measures. It is noted that residential houses will be small and constructed by the beneficiary household themselves. And not all the houses will be constructed at the same time. Beneficiary households are expected to build their houses on their own pace and have the option to hire skilled and unskilled laborers as needed. Thus, significant impact and risk are not anticipated. In this situation, the approach used by the project include training of Masons and carpenters on relevant safety measures, and making the house-owners aware of safety risks and ways to manage these risks.

In the Parent Project, there were six steps including: i) Social and Environmental Screening at the settlement level; ii) development of settlement -level Environment and Social Management Plans (ESMPs), Resettlement Action Plan (RAP) and Vulnerable Community Development Plan (VCDP); iii) Specification of minimum environmental/social requirements in the grant agreements with beneficiaries; iv) Review and clearance of settlement level ESMPs and household level specifications; v) Consultation, disclosure, and awareness raising and dissemination; and vi) Implementation and monitoring.

The project triggers the Bank's Indigenous Peoples Policy (OP/BP 4.10) and Involuntary Resettlement (OP/BP4.12). Vulnerable Community Development component has been included in the project level ESMP prepared as part of the ESMF. Project level ESMP identified Social Technical Assistance package major activity to the vulnerable groups. Socio-technical assistance package includes targeted support to these groups to expedite housing reconstruction and it is being implemented as a project activity through the PMU. A Resettlement Policy Framework (RPF) has been prepared as part of the revised ESMF. The RPF clarifies the resettlement principles, organizational arrangements and design criteria to be applied during the project implementation. The RPF also includes mitigation measures to be



followed if any negative impact are found/realized during the process of implementation, and measures for maximizing project benefits to vulnerable groups under the project, are also included. In addition, the RPF also describe the institutional arrangement, monitoring framework and disclosure arrangement that are aligned to the ESMF. Although OP 4.12 is triggered, land acquisition and involuntary resettlement is not envisaged to be significant as the beneficiaries are expected to build on their own land. and the project does not support housing construction in integrated settlement (community relocation). Additionally landless households are eligible to access additional cash assistance to purchase habitable land.

In terms of implementation, the Government of Nepal (GoN) has the overall responsibility for ensuring compliance with the safeguards documents prepared under the project. The NRA is the lead agency responsible for providing high-level oversight and policy decisions on project activities, including those relating to safeguards issues. The NRA and Implementing Units have hired Social Specialists and Environmental Specialists to provide overall oversight on social and environmental issues and risks relating to housing reconstruction as well as other activities.

DLPIU- GMALI is responsible for preparing, implementing and monitoring environmental and social safeguards management plans (ESMPs) for each Rural/Municipality. DLPIU-GMALI, for special cases, is also responsible for preparing a consolidated district level ESMP of site specific issues and mitigation measures, as may be needed, and submit such ESMP to the Central Level PIU (CL-PIU) for final approval. CLPIU- GMALI is responsible for monitoring overall compliance with the ESMF and other safeguard document. NRA/PMU will oversee the environmental and social management processes and ensures that environmental and social performance of the project is in line with GoN and World Bank requirements.

At the local/community level, the beneficiary households themselves will be responsible for the implementation of and compliance with safeguards issues. However, the proposed socio- technical assistance consisting of technicians and social mobilizer will be available to support the beneficiaries with construction activities as well as for safeguard support.

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

The ESMF has been revised based on the experience. The original as well as revised ESMF were prepared by the GoN, and cleared by the World Bank. During the preparation and the revision of the ESMF, consultations were held at the central level as well as at the district levels. The ESMF has been: (a) disclosed at the country level; (b) officially submitted to the World Bank for clearance; and (c) submitted for disclosure on the World Bank Infoshop. A summary of ESMF in Nepali is publicly disclosed in the Project website and is also made available in each project areas. And disclosure and consultation are continuously being done as part of the review and verification, implementation of the project level ESMP and site-specific ESMPs at the Municipal as well as through site visits.

Consultations with stakeholders, including 'Free, Informed and Prior Consultation' with project affected households will be a continuous feature during project implementation. Key stakeholders at consultations are the project beneficiaries (women, IPs and other vulnerable groups) i.e. earthquake victims in the project, local authorities, CBOs and NGOs.



**B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)**

**Environmental Assessment/Audit/Management Plan/Other**

Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
29-Oct-2018	28-Feb-2019	

**"In country" Disclosure**

Nepal  
31-Oct-2018

Comments

The ESMF for the parent project has been updated.

**Resettlement Action Plan/Framework/Policy Process**

Date of receipt by the Bank	Date of submission for disclosure
29-Oct-2018	28-Feb-2019

**"In country" Disclosure**

Nepal  
31-Oct-2018

Comments

The updated ESMF Annex 5 contains RFP.

**Indigenous Peoples Development Plan/Framework**

Date of receipt by the Bank	Date of submission for disclosure
29-Oct-2018	28-Feb-2019

**"In country" Disclosure**

Nepal  
31-Oct-2018

Comments

ESMF also serves the purpose of IPDF.

**If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.**



If in-country disclosure of any of the above documents is not expected, please explain why:

**C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)**

**OP/BP/GP 4.01 - Environment Assessment**

Does the project require a stand-alone EA (including EMP) report?

Yes

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?

Yes

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?

Yes

**OP/BP 4.04 - Natural Habitats**

Would the project result in any significant conversion or degradation of critical natural habitats?

No

If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?

**OP/BP 4.11 - Physical Cultural Resources**

Does the EA include adequate measures related to cultural property?

NA

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?

Yes

**OP/BP 4.10 - Indigenous Peoples**

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?

NA

**OP/BP 4.12 - Involuntary Resettlement**

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?

NA

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

NA

Is physical displacement/relocation expected?



No

Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods)

No

**OP/BP 4.36 - Forests**

Has the sector-wide analysis of policy and institutional issues and constraints been carried out?

NA

Does the project design include satisfactory measures to overcome these constraints?

NA

Does the project finance commercial harvesting, and if so, does it include provisions for certification system?

No

**The World Bank Policy on Disclosure of Information**

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

Yes

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

Yes

**All Safeguard Policies**

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

Yes

Have costs related to safeguard policy measures been included in the project cost?

Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

Yes

**CONTACT POINT**

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Kamran Akbar



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**Implementing Agencies**

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**APPROVAL**

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