

**INTEGRATED SAFEGUARDS DATA SHEET
APPRAISAL STAGE**

Report No.: ISDSA8746

Date ISDS Prepared/Updated: 25-Sep-2014

Date ISDS Approved/Disclosed: 30-Sep-2014

I. BASIC INFORMATION

1. Basic Project Data

Country:	Colombia	Project ID:	P144271
Project Name:	Forest Conservation and Sustainability in the Heart of the Colombian Amazon (P144271)		
Task Team Leader:	Adriana Goncalves Moreira		
Estimated Appraisal Date:	24-Sep-2014	Estimated Board Date:	20-Nov-2014
Managing Unit:	GENDR	Lending Instrument:	Investment Project Financing
GEF Focal Area:	Biodiversity		
Sector(s):	Forestry (74%), Central government administration (13%), Sub-national government administration (13%)		
Theme(s):	Biodiversity (54%), Environmental policies and institutions (23%), Participation and civic engagement (14%), Land administration and management (9%)		
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?			No
Financing (In USD Million)			
Total Project Cost:	43.35	Total Bank Financing:	0.00
Financing Gap:	0.00		
Financing Source			Amount
Borrower			32.95
Global Environment Facility (GEF)			10.40
Total			43.35
Environmental Category:	B - Partial Assessment		
Is this a Repeater project?	No		

2. Global Environmental Objective(s)

The project's global environmental objective (GEO) is the same as the project's development objective (PDO), namely, to improve governance and promote sustainable land use activities in order to reduce deforestation and conserve biodiversity in the Colombian Amazon forests.

3. Project Description

This Project is designed to improve governance, preserve and sustainably manage over nine million hectares of land, in the Heart of the Colombian Amazon. The Project is inserted in the GoC's "Low Deforestation Development Vision for the Colombian Amazon", which calls for the construction of a partnership model between Colombia and the international community to promote low-carbon development models in all of its forested areas. The Project intends to avoid millions of tons of CO₂ emissions per year, preserve a biological corridor between the Andes and the Amazon, promote sustainable development and improve the livelihoods of local campesino families and indigenous peoples in the Project area.

A. Project Components

The Project includes four components:

Component 1: Protected Areas Management and Financial Sustainability

- A. Strengthen the management effectiveness of the PNNSC and its buffer zone through, inter alia, the design and implementation of a management plan for the PNNSC.
- B. Increase the financial sustainability of the management of about 2.7 million hectares of protected areas in the Project Area.

Component 2: Forest Governance, Management and Monitoring.

- A. Enhance the institutional capacity and financial sustainability of relevant stakeholders for sustainable landscape governance, management, and monitoring of the Project Area.
- B. Enhance the institutional capacity of relevant stakeholders to monitor GHG emission reductions, in accordance with the NSFCM, in the Project Area.
- C. Enhance the capacity of indigenous peoples' authorities for sustainable land-use practices and forest governance within indigenous territories in the Project Area.
- D. Support the disclosure of data on reduction of deforestation in the Project Area.

Component 3: Sectoral Programs for Sustainable Landscape Management.

- A. Support improvement of cross-sectoral policy coordination and consistency to achieve long term-reductions in deforestation in the Project Area.
- B. Support the development and adoption of guidelines and programs in, inter alia, the agriculture, extractive industries and infrastructure sectors, aimed at reducing pressures on forests and biodiversity, and GHG emissions and restoring ecosystems in the Project Area.
- C. Support the promotion of sustainable land-use and natural resource management practices that contribute to the restoration of vegetation, reduce pressure on forests and advance the livelihoods of local communities in the municipalities of San Jose del Guaviare, Calamar and Cartagena del Chaira.

Component 4: Project Coordination, Management, Monitoring and Evaluation.

Strengthen the PCU to ensure coordination, management, monitoring, evaluation, and communication for the implementation of the Project.

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

The Project seeks to address the conservation of an area of over nine million hectares in the Heart of the Colombian Amazon, which is a vast area of humid tropical forest that spans the neighbouring provinces of Amazonia and Guyana. The Project aims to avoid million tons of CO2 emissions per year, while helping promote peace and sustainable development in that region in southern Colombia.

The Project Direct Intervention Area (PDIA) spans the departments of Caquetá, Meta, Guaviare and Amazonas and is in the jurisdiction of the following municipalities: San Vicente del Caguán, Cartagena del Chairá and Solano (in Caquetá Department); San José del Guaviare y Calamar (in Guaviare Department); La Macarena (in Meta Department); and in Mirití-Paraná—an area that is not yet within a municipality (in Amazonas Department). Legally speaking, these territories encompass the following areas:

- (a) The Natural Chiribiquete Mountain Ridge National Park (PNNSCH), a Protected Area, which occupies 2,782,353 hectares. The area was created in 1989 by Resolution 120 of the Ministry of Agriculture and expanded in 2013 through Resolution 1038 of the Ministry of Environment and Sustainable Development (MADS).
- (b) An area known as the Ariari-Guayabero District of Integrated Management of Natural Renewable Resources (also known as “Restoration Zone for Southern Production”), located in San José del Guaviare and Calamar (Guaviare Department).
- (c) Seven indigenous peoples reserves (resguardos). Six of the reserves occupy an area of 2,387,939 hectares, and are located along the Caquetá river between the departments of Caquetá and Amazonas. They are: (i) Puerto Zábalo-Los Monos, (ii) Monochoa, (iii) Aduche, (iv) Nonuya de Villazul, (v) Mesay and (vi) Miriti-Paraná. The seventh reserve, Yaguará II, occupies 146,500 hectares and is spread over three municipalities in two departments, namely La Macarena, San Vicente del Caguán and San José del Guaviare.
- (d) Areas located inside the Amazon Forest Reserve in the Caquetá and Guaviare Departments.
- (e) Areas removed (“areas sustraidas”) from the Amazon Forest Reserve in Cartagena del Chairá and Calamar municipalities (in Caquetá Department) and San José del Guaviare municipality (Guaviare Department).

The PNNSC represents the core of the Project area and features extensive tepuis—towering rock formations—belonging to the Guyana biogeographic province, surrounded by undisturbed rainforest of highly difficult access due to the lack of roads and presence of rapids that impede navigation. The park includes the upper reaches of the Apaporis and Yarí rivers, major tributaries of the Caquetá River, which empties into the Amazon River. The Apaporis River is the second longest river entirely within Colombia and is of enormous cultural significance for indigenous peoples in the Amazon.

The park is also known for its abundant rock paintings in 32 archaeological sites. Colombia is considering nominating the area as a World Heritage site. PNNSC will conserve 41 different ecosystems, including várzea forests and savannahs, terra firme forests, and savannahs and shrublands associated with tepuis. Eight of these ecosystems are not represented in existing protected areas. The area is an important centre of endemism, and while its fauna and flora are still far from having been studied extensively, 300 species of birds have been reported, as well as 72 species of beetles, 313 species of butterflies, 261 species of ants, seven species of primates, three species of otters, four species of felines, 48 species of bats, two species of dolphins and 133 species of fish. There are 43 threatened species including the Harpy Eagle *Harpia harpiya* and the only bird species endemic to the Colombian Amazon, the hummingbird *Chlorostilbon olivaresi* (PNNSC, 2012).

5. Environmental and Social Safeguards Specialists

Kristyna Bishop (GSURR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/ BP 4.01	Yes	<p>This is a category “B” project. The proposed investments seek to protect critical natural habitat through consolidating the expansion of an existing protected area (Chiribiquete National Park) and by supporting governance (institutions, zoning, action plans, carbon monitoring, dialogue and policies) for the entire area in order to reduce and avoid deforestation. While the Project will not finance civil works or other activities with a physical footprint, some of the activities related to protected areas management, land use planning and forest management could have social and environmental implications.</p> <p>The Project is designed to generate positive environmental impacts through protection of critical natural habitats and improved land-use planning. Nevertheless, some activities in the buffer-zone through improved enforcement, changes in land-use provisions, and promotion of financial mechanisms linked to emissions reductions could be sensitive from a social standpoint.</p> <p>An Environmental and Social Management Framework (ESMF) has been prepared by the Recipient and co-executants. This describes the process and criteria to consolidate the expanded protected area, land-use plans in the buffer zone and development of enforcement capacity, as well as other activities to be financed by the Project. The ESMF analyzes gaps in existing systems, best practices in different sectors and how can sustainability practices be improved. It also addresses any livelihood activities to be supported through the GEF or counterpart-funded activities when they go beyond activities included within the Process Framework for restrictions in access. The ESMF incorporates consultation processes with private sector, ranchers, and indigenous communities among others. The ESMF has sought consistency with the activities surrounding the FCPF/REDD+ process in Colombia presently supported by the Bank.</p>
Natural Habitats OP/BP 4.04	Yes	This policy is triggered given that the decisions made in terms of land management planning will

		affect critical natural habitats. Policy, land-use and enforcement activities could accelerate deforestation processes if not approached correctly with proper social engagement and consultation. The ESMF includes a description of the process to engage with the different stakeholders during the Project to avoid or minimize any conversion or degradation that may result from human activity induced by the Project.
Forests OP/BP 4.36	Yes	This policy is triggered given that the decisions made in terms of land management planning including forest management plans will affect forests. The ESMF includes the process for development of sustainable management plans and other forestry-related policies and enforcement activities. The ESMF also reviews the regulations in light of the Bank policy requirements for sustainable forest management.
Pest Management OP 4.09	Yes	Livelihood activities might include sustainable agriculture or reforestation activities that may require pest management. The necessary provisions to meet policy objectives have been incorporated in the ESMF.
Physical Cultural Resources OP/BP 4.11	Yes	This policy is triggered as the project will support changes in the acceptable use and access to areas with potential cultural significance (sacred sites) for communities living within and around the protected areas and management zones. The principles of this policy have been integrated into the planning processes described in the ESMF.
Indigenous Peoples OP/BP 4.10	Yes	This policy is triggered as there are indigenous peoples living in the Project area. During preparation, a social assessment, seven Indigenous Peoples Plans (IPPs) and an Institutional Guide for Avoiding Contact and Negative Impact on Indigenous Peoples Living in Voluntary Isolation or Initial Contact were prepared and disclosed per the requirements of OP 4.10. The IPPs were prepared with the full collaboration of the Indigenous Traditional Authorities of the resguardos (AATIs) and reflect the agreements made with them during the process of free, prior and informed consultation carried out by the National Parks Agency (PNN) during the expansion of the Chiribiquete Park last year. Drafts of the IPPs were shared and

		discussed with the respective communities and Actas from each community have been attached to the instrument as evidence of their broad community support for their respective Plan. The Institutional Guide for Avoiding Contact and Managing Negative Impacts on Indigenous Peoples Living in Voluntary Isolation was prepared based on international best practice and was peer reviewed by the Amazon Conservation Team. It was not be subject to a consultation process with these communities but was presented during the general consultation of the ESMF. The final versions of the IPPs were disclosed on the websites of the PNF, PNN and the Bank's Infoshop prior to appraisal. Please see section B of this ISDS for the specific dates of disclosure.
Involuntary Resettlement OP/BP 4.12	Yes	Physical relocation or land acquisition will not be required for project activities but a Process Framework (PF) has been prepared in order to screen for and manage any involuntary restrictions on access to natural resources in the forest buffer zone during the process of identifying new regional protected areas. The Process Framework does not cover the voluntary process that will be managed using a voluntary agreement with SINCHI under Component 3. A social assessment to identify some of these potential impacts and their scope as well as the stakeholders that might be affected was completed during preparation and a summary of the results is included in the Process Framework. The Process Framework was disclosed per the requirements of OP 4.12. Please see section B of this ISDS for the specific dates of disclosure.
Safety of Dams OP/BP 4.37	No	This project will not finance any dams nor will rely on the operations of existing dams.
Projects on International Waterways OP/BP 7.50	No	This project will not finance activities that impact any international waterways as defined by the policy.
Projects in Disputed Areas OP/BP 7.60	No	This project will not finance activities in disputed areas as defined by the policy.

II. 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

<p>and describe any potential large scale, significant and/or irreversible impacts:</p>
<p>The proposed investments seek to protect critical natural habitats through consolidating the expansion of an existing protected area (Chiribiquete National Park) and supporting governance arrangements (institutions, zoning, action plans, carbon monitoring, dialogue and policies) for the entire area in order to reduce and avoid deforestation. While the Project will not finance civil works or other activities with a physical footprint, some of the activities related to of protected areas management, land-use planning and forest management could have social and environmental implications. These potential impacts would be of limited scope and will not be significant or irreversible. The Recipient and partners prepared an ESMF including the analysis, screening and measures to manage and mitigate these potential impacts.</p>
<p>2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:</p>
<p>The Project is designed to generate long term positive environmental impacts through protection of critical natural habitats and improved land-use planning. It is intended to improve the sustainability of some of the agricultural activities of small landholders, improve the protection of indigenous peoples living in voluntary isolation or initial contact and strengthen indigenous management of natural resources in their traditional territories. Nevertheless, the expansion of the protected area as well as increased regulation of activities in the buffer-zone, changes and improved enforcement of land-use provisions and the promotion of financial mechanisms linked to payment for results may lead to indirect impacts. The ESMF includes the measures to prevent and manage these eventual implications. The Institutional Guide for Avoiding Contact and Managing Impact on Indigenous Peoples Living in Voluntary Isolation or Initial Contact provides information regarding best practices for avoiding contact and guidance regarding what to do if there is unavoidable contact with these vulnerable groups.</p>
<p>3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.</p>
<p>This Project does not involve an analysis of alternatives. The situation without the project would lead to negative environmental impacts induced by an increase in the deforestation rate. This Project has been prepared assuming it is designed to generate long-term indirect positive environmental impacts through protection of critical natural habitats and improved land-use planning. Most project activities have been prepared under a participatory scheme and with different instances of consultation. The ESMF describes the approach to be followed in each component and identifies the measures to avoid adverse impacts.</p>
<p>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.</p>
<p>An Environmental and Social Management Framework (ESMF) has been prepared for the Project. It defines the screening procedures and criteria that the Recipient and the co-executants will use to identify any impacts related to Project activities, determine whether any specific environmental and/or social analysis will be required in order to identify these impacts or mitigation measures and defines the specific EA procedure to be followed during Project implementation. The Project is expected to generate many positive benefits both for the protection of the resources and biodiversity in the Project area and for the people living there. It should be noted that the protected area actions followed by PNN to date have been shown to be effective in conserving forest and watershed resources. Existing protocols and regulations for the expansion of the Chiribiquete National Park included studies of ecological and social conditions, opportunities, and risks, and measures for enhancing positive outcomes and mitigating risks. A process of free, prior and informed consultation was undertaken with the seven resguardos that are located in the area of</p>

influence of the Park and agreements were reached with these communities regarding activities that will help them contribute to its management and protection, as well as to the management of their territories, which are on the periphery of the Park. These agreements were incorporated into the seven IPPs that were prepared and will ensure that PNN fulfill its obligations under the Law on Prior Consultation and comply with the requirements of OP 4.10. The ESMF includes guidelines to enhance management plans and monitoring systems that provide for detecting and addressing environmental and other impacts in real time. All Project activities are subject to the environmental procedures defined in the ESMF and in compliance with the requirements (as stated in the ESMF) of the national and subnational legal frameworks.

Participation by campesino families in agro-ecology and sustainable forestry productive arrangements will be on a voluntary basis.

From a technical point of view, SINCHI, PNF and PNN (the three agencies with direct exposure to safeguards instruments) have a good level of capacity to manage environmental and social issues. During preparation, they undertook and managed a very complex approach to social safeguards that went far beyond basic compliance. For OP 4.10, for example, they built upon the relationships and agreements developed during the robust consultation process with the indigenous territories (resguardos) prior to the expansion of the Chiribiquete Park in order to prepare IPPs that will fulfill the agreements made during the consultation process but that are also mainstreamed into the project activities and annual planning processes. It was clear during preparation that the implementing agencies are cognizant of the security risks associated with the project area and measures to mitigate these risks will be included in the Operations Manual. The Project will include measures to ensure that all the participating institutions have a good level of presence in the field by funding additional staff, incremental costs for transportation, etc.

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

Specifically, direct beneficiaries of the Project include:

- (a) An estimated 3,485 indigenous peoples, including their tradition authorities (AATI), living in the seven indigenous reserves (Resguardos of Mirití-Parará, Nonuya de Villazul, Aduche, Mesay, Yaguará II, Monochoa and Puerto Zábalo-Los Monos);
- (b) Campesino families in Cartagena de Chairá, San José de Guaviare and Calamar (approximately 200 families involving 800 people);
- (c) Agricultural and rural producer associations;
- (d) The municipal and regional governments of Caquetá and Guaviare Departments; and
- (e) Regional environmental authorities (i.e. CDA and Corpoamazonia).

During implementation, the Project will involve stakeholders from civil society including the Indigenous Peoples Traditional Authority Associations (AATI), social and environmental NGOs working in the area, government agencies such as the Colombian Institute of Rural Development (INCODER), the Ministry of Agriculture and Rural Development (MADR), the Ministry of Mines and Energy, the Oil and Hydrocarbons Agency (ANH), the National Roads Institute (INVIAS), the National Environmental Licensing Authority; and the municipalities of San José del Guaviare, Calamar, San Vicente del Caguán, Cartagena del Chairá, and La Macarena. Given the nature of the activities to be financed, these are all deemed key Project stakeholders although they are not all direct beneficiaries.

The adoption of sectoral programs in critical sectors such as cattle ranching, agriculture, oil and roads to improve practices that reduce pressures on forests and biodiversity will also benefit the governance process as a whole and, in particular, the implementation of sustainable land and other management practices that will provide more stable support for biodiversity-friendly activities. Therefore, the outputs produced during this Project are expected to benefit governmental and non-governmental decision makers in the long run, improving management effectiveness of biodiversity in general terms, while also benefiting the local population, including indigenous communities, through improvements in their livelihoods.

The safeguards documentation is available on the PNF, PNN, and SINCHI websites. All safeguard instruments have been widely disclosed in the country since August 21, 2014 and sent to the Bank's InfoShop for publication. Public consultation meetings took place between May and August 2014. No significant issues were raised during the consultation process and the project design was not changed. Feedback provided has been taken into account in the final versions of the documents.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other	
Date of receipt by the Bank	21-Aug-2014
Date of submission to InfoShop	24-Sep-2014
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	
"In country" Disclosure	
Colombia	21-Aug-2014
<i>Comments:</i>	
Resettlement Action Plan/Framework/Policy Process	
Date of receipt by the Bank	21-Aug-2014
Date of submission to InfoShop	23-Sep-2014
"In country" Disclosure	
Colombia	21-Aug-2014
<i>Comments:</i>	
Indigenous Peoples Development Plan/Framework	
Date of receipt by the Bank	21-Aug-2014
Date of submission to InfoShop	23-Sep-2014
"In country" Disclosure	
Colombia	21-Aug-2014
<i>Comments:</i>	
Pest Management Plan	
Was the document disclosed prior to appraisal?	Yes
Date of receipt by the Bank	21-Aug-2014
Date of submission to InfoShop	24-Sep-2014

"In country" Disclosure	
Colombia	21-Aug-2014
<i>Comments:</i> Pest management issues are considered as part of the Project's Environmental and Social Management Framework.	
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:	
Pest management issues are considered as part of the Project's Environmental and Social Management Framework.	

C. Compliance Monitoring Indicators at the Corporate Level

OP/BP/GP 4.01 - Environment Assessment	
Does the project require a stand-alone EA (including EMP) report?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.04 - Natural Habitats	
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes [<input type="checkbox"/>] No [<input checked="" type="checkbox"/>] NA [<input type="checkbox"/>]
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?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input checked="" type="checkbox"/>]
OP 4.09 - Pest Management	
Does the EA adequately address the pest management issues?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Is a separate PMP required?	Yes [<input type="checkbox"/>] No [<input checked="" type="checkbox"/>] NA [<input type="checkbox"/>]
If yes, has the PMP been reviewed and approved by a safeguards specialist or PM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input checked="" type="checkbox"/>]
OP/BP 4.11 - Physical Cultural Resources	
Does the EA include adequate measures related to cultural property?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.10 - Indigenous Peoples	
Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?	Yes [] No [] NA [×]
OP/BP 4.12 - Involuntary Resettlement	
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes [×] No [] NA []
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [×] No [] NA []
OP/BP 4.36 - Forests	
Has the sector-wide analysis of policy and institutional issues and constraints been carried out?	Yes [] No [] NA [×]
Does the project design include satisfactory measures to overcome these constraints?	Yes [] No [] NA [×]
Does the project finance commercial harvesting, and if so, does it include provisions for certification system?	Yes [] No [] NA [×]
The World Bank Policy on Disclosure of Information	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [×] No [] NA []
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 [×] No [] NA []
All Safeguard Policies	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [×] No [] NA []
Have costs related to safeguard policy measures been included in the project cost?	Yes [×] No [] NA []
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [×] No [] NA []
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [×] No [] NA []

III. APPROVALS

Task Team Leader:	Name: Adriana Goncalves Moreira	
Approved By		
Regional Safeguards Advisor:	Name: Glenn S. Morgan (RSA)	Date: 30-Sep-2014
Practice Manager/Manager:	Name: Emilia Battaglini (PMGR)	Date: 30-Sep-2014