



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 06/18/2019 | Report No: ESRSC00641



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Bangladesh	SOUTH ASIA	P169880	
Project Name	Western Economic Corridor and Regional Enhancement Program		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Transport	Investment Project Financing	2/3/2020	6/30/2020
Borrower(s)	Implementing Agency(ies)		

Proposed Development Objective(s)

To improve regional connectivity, logistics efficiency in the western region, and road sector management in Bangladesh

Financing (in USD Million)	Amount
Total Project Cost	735.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The project will comprise (i) upgrading of existing 260km two-lane road to four-lane and two service lanes for slow moving vehicles on the Bhomra-Navaron-Jessore--Hatikumrul corridor. Optical fiber cable/utility conduit will be installed for the entire length of the corridor; (ii) upgrading and rehabilitating priority Upazila and Union roads that connect to the trunk corridor. Optical fiber cable conduit will be considered for select Upazila roads; and (iii) complementary logistics infrastructure improvements such as development of community market structures (storage, processing, selling/ distribution facilities), with a focus on women participation.

D. Environmental and Social Overview



D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
The proposed program is located in the Western Region of Bangladesh along the 260-km Jessore – Jhenaidah - Jessore – Bonpara - Hatikumrul and Bhomra – Navaron – Satkhira corridors, respectively. During the first phase, the proposed program will support the improvement and widening of the 48-km Jessore – Jhenaidah Road and the 52km Bonpara to Hatikumrul road (financed in parallel by AIIB); the upgrading and rehabilitation of feeder connectivity infrastructure (e.g., priority Upazila and Union roads that connect to trunk corridors); improvements to complementary logistics infrastructure (e.g., storage, processing, selling and distribution facilities) and technical assistance to improve the capacity of implementing agencies, including capacity to plan and implement environmental and social standards. The terrain along the whole corridor is flat. The horizontal alignment of the existing roads is generally open and free flowing, but in a few areas there are alignment constrictions due to the presence of urban areas and railway lines in close proximity to the road. In some sections, the present ROW is sufficient for the widening but in most locations, the acquisition of lands and physical displacement and relocation of structures will be necessary. The program is not located in any natural forests, protected areas or critical natural habitats. The whole corridor passes through urban, semi-urban and agricultural areas. Both Jessore and Jhenaidah have ancient Hindu temple sites nearby and Jessore, in particular, has pre-colonial and colonial historical structures. There are mature trees along the ROW which will need to be cut, but this will be avoided to the extent possible. Some mosques, temples, graves and madrasahs are close to or within the ROW and will need to be partially or fully relocated, but this will also be avoided to the extent possible. There are legally owned houses and commercial structures as well as squatters along the ROW that will be affected due to widening of the road. Resettlement and livelihood restoration programs will need to be designed and administered before the construction proceeds along with special provisions for vulnerable populations. Physical displacement of people and labor influx for construction may induce additional risks on women and girls in communities with regards to gender-based violence (GBV). A GBV risk assessment will be conducted and specific measures to address GBV issues will be designed during project preparation following the Bank’s Good Practice Note. There are no indigenous peoples in the Jessore and Jhenaidah districts. The presence or absence of indigenous peoples for the rest of the road corridor will be screened during project preparation.

D. 2. Borrower’s Institutional Capacity

LGED is a long-time Bank client and is quite familiar with Bank safeguard policies and Bank processes. It currently implements the Second Rural Transport Improvement Project, an IPF, and the Rural Roads and Bridges Program, a Program for Results (PforR). LGED has a reasonable track record of implementing safeguard policies in Bank-financed projects it implements. Its PIUs have Environmental Specialist and Social Development Specialist and under the Rural Roads and Bridges PforR Program Action Plan, LGED has agreed to establish an Environmental and Social Unit by July 2019. The ESF is new to LGED, as it is to all other implementing agencies. RHD on the other hand has not been implementing Bank-financed projects for years though it was a Bank client in the past and also has familiarity with Bank safeguard policies. However, RHD continues to implement ADB-funded projects and is familiar with ADB safeguard policies. RHD has an Environment and Social Circle Unit with 2 Divisions, Environment Division and Resettlement Division, in its institutional organogram staffed by 6 people, all with engineering backgrounds. This Unit has been sparingly involved in preparing and implementing ADB-funded projects and projects financed by bilateral agencies such as JICA. Its credibility within RHD needs to be improved and its capacity strengthened. A detailed E & S capacity and systems assessment of RHD and LGED will be undertaken during project preparation following the Bank Guidance Note on Assessing Borrower Capacity at the Project Level. The assessment of LGED will build on the Environmental and Social Systems Assessment conducted for the Rural Roads and Bridges PforR operation. The outcomes of the assessment will inform the required E & S staffing and strengthening for this proposed program and will be used to develop a long-term E & S capacity building program for both agencies to be supported under the program. This will be documented in the Environmental and Social Commitment Plan (ESCP).



II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

High

Environmental Risk Rating

Substantial

The first phase of the proposed program will involve widening and expansion of the existing 48-km Jessore - Jhenaidah Road and the 52-km Bonpara - Hatikumrul road . This will encompass upgrading of the existing two-lane road to four lanes. Separate Slow-Moving Vehicle Traffic (SMVT) lanes will be introduced on both sides of the main carriageway. The physical segregation of SMVT from normal motorized traffic is anticipated to decrease the potential for serious accidents. It will also support construction and/or rehabilitation of priority feeder and complementary logistics infrastructure. The corridor is existing and does not traverse any sensitive habitats, protected areas or critical natural habitats. There are mature trees along the ROW that will need to be cut; lands to be acquired; and structures such as houses, mosques, temples, graves and madrasahs that will be partially or completely displaced, but this will be avoided to the extent possible. Environmental risks and impacts mainly relate to physical works during construction, specifically the tree cutting along the ROW; health and safety of workers and communities along the project corridor and transport routes of construction supplies and materials; and siltation and sedimentation of waterways from road works. Negative impacts are anticipated mainly during construction largely within existing footprints and can be managed through implementation of engineering measures and good construction site management. During operation it is expected that impacts will be mainly positive on the economy as well as on safety of communities with improved safety features of the widened roads. Environmental risks and impacts, while adverse, are largely localized, confined within the ROWs and physical locations of the activities and concentrated during construction. In addition, LGED is quite familiar with Bank safeguard policies and both RHD and LGED have the environmental and social structures in their organograms though capacity strengthening actions can be designed and implemented. For these reasons, environment risk is rated Substantial.

Social Risk Rating

High

The first phase of the program will affect a significant number of residential and commercial structures along the ROW due to land acquisition. Affected people will lose their lands, houses and livelihoods, and some will need to resettle. It is anticipated that there will be a large number of squatters along the ROW who will also be affected. The adverse impacts on vulnerable PAPs (e.g. elderly, disabled and female-headed households) may be significant (this will be determined after the ESIA report is received). During the construction phase, labor influx will result in risk of GBV for women and girls in the communities along the corridors. During the operation phase, the potential impacts will be mostly positive. However, the increased traffic and usage of roads may pose risks of increased incidents of accidents during the operation phase. Road safety awareness raising programs will be designed and implemented. While one implementing agency (LGED) has good capacity in managing social risks, the other implementing agency (RHD) lacks resources and capacity to manage such risks. RHD will need to develop resettlement action plans for the linear ROW that will affect title holders, squatters and vulnerable groups. Due to extremely dense built-up areas and thriving economic activities along the ROW, the program will result in significant negative impacts. As the local businesses and markets will be affected due to project activities, there will be potentially many individuals and households that may become impoverished unless the impacts are properly assessed and mitigated. Many will lose their livelihoods and income sources and become unemployed. At the same time, huge influx of labor is expected because of requirement of specialized skills and the lack of such skills locally. This will increase the risks to community

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health and safety, including from GBV. There is a potential that these affected people will be aggrieved against the project and laborers from outside the area without adequate consultation and communication and impact mitigation. RHD will need to develop and implement a Stakeholder Engagement Plan and Labor Management Procedure. Moreover, RHD contractors do not usually develop and implement code of conduct for its workers. All in all, the planned minimization and mitigation of the adverse impacts caused by the project will require resources and skills. The implementing agencies are not familiar with the new processes and they do not have the requisite skill sets now. Finally, following the common approach for AIIB funded segments of the program will require well-coordinated preparation, implementation and supervision of activities. Due to these reasons, the social risk is rated High.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

Key environmental and social risks and impacts of the proposed program are anticipated to occur largely during the construction phase and within existing footprints. Key impacts include: (i) cutting of mature trees along the expanded ROW; (ii) health & safety of workers and communities within the corridor and along the transport routes of construction supplies, materials and equipment; (iii) exposure of population in urban and semi-urban centers along the ROW and transport routes to noise, vibrations, air pollution and safety risks; (iv) siltation and sedimentation of waterways close to the physical works; (v) significant land acquisition along the expanded ROW; (vi) physical displacement of houses and some mosques, temples, madrasah and graves; (vii) temporary economic displacement of some vendors and businesses along the ROW and in market areas where some rural roads will be constructed and/or rehabilitated; and, (viii) increased risk of GBV and road accidents. The program will mainly employ local labor for unskilled labor requirements, but skilled laborers may come from other areas of the country or from abroad; thus risks deriving from labor influx are expected to be substantial to high. During the operation & maintenance phase, impacts to the economy from improved roads and connectivity and road safety are expected to be significantly positive. An ESIA/ESMP and RAP were prepared for the Jessore – Jhenaidah Road in 2015 with funding support from ADB, in accordance with its safeguard policies. These documents will be updated to meet the requirements of the new ESF and relevant E & S Standards, including but not limited to expanding the scope of the ESIA to assess the risks and impacts of relevant standards, the preparation of ESCP, Labor Management Procedures, Stakeholder Engagement Plan, Borrower Capacity Assessment and Capacity Building Program, etc. For the Bonpara to Hatikumrul road, which will be financed in parallel by AIIB, a common approach will be adopted for which AIIB will rely on meeting the requirements of the ESF and the World Bank’s due diligence. TORs and E & S instruments will be reviewed and cleared by the Bank, as agreed with AIIB. For the other roads within the corridor to be implemented in the future, Terms of Reference for the ESIA and RAPs for these roads will also be prepared, reviewed and cleared by the Bank. For LGED-supported rural roads and complementary logistics infrastructure, which will likely not require full assessments, ESMPs and RAPs will be prepared for subprojects to be implemented during the first year of the program. For other subprojects to be identified and implemented in the second year onward, the existing ESMF and RPF used by LGED under the Second Rural Transport Integrated Project will be updated to meet the requirements of the new ESF. In addition, LGED will also develop and disclose an ESCP, Labor Management Procedures, Stakeholder Engagement Plan and Borrower Capacity Assessment and Capacity Building Program. The ESIA for Jessore - Jhenaidah Road and Bonpara - Hatikumrul Road and ESMPs for rural roads will pay particular attention to assessing the risks and impacts of these interventions to disadvantaged and vulnerable groups. The program will ensure early,



continuous and inclusive stakeholder engagement. The findings of the ESIA's and the Bank's GBV Risk Assessment Tool will guide the identification of GBV risks and the subsequent development of mitigation plans. In addition, a strategic environmental and social assessment for the improvement of the other corridor and surrounding areas will be explored during implementation of phase 1.

The Bank task team also did an initial screening of potential associated facilities within the corridor other than the AIIB-financed roads based on the criteria of an associated facility defined in the ESF. Based on the initial screening, there are no associated facilities except the AIIB-financed sections. This will be further confirmed during the project preparation.

Areas where “Use of Borrower Framework” is being considered:

The use of the Borrower Framework will not be considered for this project although the project will meet both the requirements of the GoB and the relevant World Bank ESSs.

ESS10 Stakeholder Engagement and Information Disclosure

In consultation with the Bank, both RHD and LGED will prepare and implement their respective inclusive Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and its associated risks and impacts. The ESIA's will identify stakeholders (affected parties and other interested parties) along the ROW and transport routes of the project, including land owners, tenants, farmers, fishers, business owners, vendors, hawkers, utilities, truck and bus drivers, private car owners, etc. along the corridor. RHD and LGED will engage in meaningful consultations with all stakeholders throughout the project life cycle paying attention to the inclusion of women and vulnerable and disadvantaged groups. The Borrower will prepare Stakeholder Engagement Plan (SEP) which includes a detailed schedule of planned activities for the various stakeholders during implementation of the project which specifies format and frequency of such engagements. A draft of the SEP will be prepared and disclosed as early as possible but prior to Appraisal. The client will seek stakeholder feedback and opportunities for proposed future engagement, ensuring that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context. The Borrower will maintain and disclose documentation (evidence) of these consultations. It will also establish a GRM comprising a summary of the feedback/grievances received and a brief explanation of how the feedback was taken into account or the grievances were addressed.

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B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The proposed program will entail employment of a significant number of labor especially during construction. The majority of labor will be locally hired, with the exception of skilled workers who may not be found in the program areas. The Jessore – Jhenaidah Road and Bonpara - Hatikumrul Road are approximately 48 km and 52 km long, respectively, with significant widening and labor camps are anticipated. For the rural roads, labor requirements are expected to be medium in size mostly supplied by local labor.



To ensure that local labor/communities are hired, clear contractual agreements will be provisioned by both RHD and LGED with the works contractors. The proposed program will entail employment of a significant number of labor especially during construction. While the majority of the unskilled labor will be locally hired, the skilled workers may not be found in the program areas. The Jessore – Jhenaidah Road and Bonpara - Hatikumrul Road are approximately 48 km and 52 km long, respectively, with significant widening required, and the establishment of labor camps is anticipated for those. For the rural roads, labor requirements are expected to be more modest and satisfied by local labor. To ensure that local labor/communities are hired, clear contractual agreements will be provisioned by both RHD and LGED with the works contractors. Labor Management Procedures (LMP) will be developed and a standalone worker-specific GRM (for direct and contracted workers) established. The LMP will identify main labor requirements (how different categories of workers will be managed, in accordance with the requirements of national laws and ESS2) and risks associated with the program and determine the resources necessary to address labor issues. The ESIA will assess labor risks, including risks of child labor and forced labor. To ensure the health and safety of workers during the construction and operational phases of the program, both RHD and LGED will require contractors to prepare and implement their Occupational Health & Safety Plan (OHSP) following the World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction activities) and Industry Sector Guidelines for Construction Materials Extraction. The OHSP will also include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures, and continuous worker training/awareness.

ESS3 Resource Efficiency and Pollution Prevention and Management

With expansion of roads from 2-lane to 4-lane, a significant number of mature trees along the expanded ROW will be felled during construction. Requirements for construction materials will be significant, especially filling materials to elevate the road to make it more climate resilient. Filling materials will be sourced largely from river dredging activities, which are quite abundant in Bangladesh. Aggregates, though, is an issue as Bangladesh largely imports these materials from India. Bitumen will also be imported. During the construction phase, air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by construction activities. Those most likely to be affected are people living within the proximity of the construction sites and along the corridor and transport routes. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction, and residual impacts are expected to be limited in scope and duration. Water requirements will also be significant but Bangladesh has abundant water resources to meet the construction requirements without negatively affecting waterways and water sources. Construction activities will generate solid and liquid waste which will primarily include excavated soil and hazardous waste such as hydrocarbon oils from construction machinery and vehicles. The waste generated by the construction works will largely be disposed of at approved sites according with national laws and regulations.

Greenhouse gas emissions from the program will be calculated following the methodology developed by the World Bank and will be integrated into the ESIA.

ESS4 Community Health and Safety

Construction activities expose communities to health and safety risks especially those communities that are immediately close to the construction activities and along and within the corridor and transport routes. Expansion of



the corridor and road works and works related to logistics infrastructure expose communities to health and safety risks from increased traffic during construction along the corridor and transport routes. Access will also be affected. This disruption in movement would cause inconvenience to the local communities as access would be interrupted temporarily. Traffic management plans will be put in place to address these inconveniences. For all the construction work, the ESMP will require contractors to install a safety system around the project sites (fences and safety guards) during the entire construction period. When works take place on open roads, equipment and vehicles will be brought together to one single well-secured area during the night to ensure both community and worker's safety. In addition, the road design will also consider improving accessibility for people with disabilities. A Community Health & Safety Plan will be required from contractors, which will also include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures and community awareness raising activities.

During operation, road safety and community health and safety are anticipated to significantly improve with the installation of safety features on widened roads.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project will finance the widening of highways and construction of feeder roads. These activities would involve land acquisition that would lead to the loss of land and loss or the disruption of income streams and livelihood activities for individuals or groups of people. Therefore, the ESMF will include a social risk assessment and a Resettlement Policy Framework (RPF) will be prepared, consulted upon and disclosed before appraisal. Subsequent Environmental and Social Management Plans (ESMP) and Resettlement Action Plans (RAPs) will be developed during project preparation. The ESMFs and RAPs will be reviewed, consulted upon, approved and disclosed both within the country and on the World Bank's web site prior the commencement of the civil works.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project will affect a significant number of mature trees that have to be cut to give way for the expanded ROW. These trees are dotting the roadside in largely agriculture landscape and built-up areas and the ESIA will assess if these trees are providing ecosystem services that will be affected by the project. The road design will try to avoid and/or minimize the cutting of these mature trees, to the extent possible. In addition, the RHD will implement an offset/compensatory reforestation program through RHD's Social Reforestation program. The corridor traverses agricultural, urban and semi-urban areas. There are no sensitive habitats, protected areas or critical natural habitats close to the ROW that would be directly or indirectly affected. There are, however, natural waterways that might be affected during construction. The updated ESIA will confirm the absence of any ecologically important, endangered and vulnerable species along the ROW and the project's other physical impact areas.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

There are no known indigenous peoples in the project area, so ESS7 is not currently Relevant to the project. However, the presence or absence of indigenous peoples for the road corridors will be screened during project preparation and if any such groups are identified the principle of ESS7 will be implemented through development of a detailed IPP with the provision of free, prior and informed consent as appropriate.



ESS8 Cultural Heritage

There are some mosques, temples and graves along the ROW, which may be affected by project works. If they are found by the ESIA to be affected, they will have to be relocated and will be included in the RAP prepared for the program. Chance Find Procedures will be included in the ESMP and chance find clause will be included in works contracts requiring contractors to stop construction, if cultural heritage are encountered during construction. The Borrower will also have to notify and closely coordinate with the relevant mandated country authority for the salvaging and restoration of such cultural heritage.

ESS9 Financial Intermediaries

The first phase of the proposed program will not involve financial intermediary.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? Yes

Financing Partners

The AIIB will support parallel financing of the Bonpara - Hatikumrul section of the corridor and there is risk of non or under-implementation of environmental and social standards in that section. However, it was agreed with AIIB that a common approach will be applied to the whole program/corridor regardless of source of financing. In this case, the World Bank’s ESF will be applied and AIIB will rely on the ESF and Bank’s due diligence to assess and manage E & S risks and impacts. All preparation assessments and documents would be prepared as per the ESF and the Bank would review the same.

Since timelines of board delivery might be different, there is a need to discuss and agree on disclosure arrangements of E & S instruments and plans, which would be defined and documented in the ESCP.

During supervision, the following options will be discussed further and agreed during preparation: (i) As per the 2016 WB AIIB Framework agreement, AIIB would buy supervision services from WB; and, (ii) AIIB would supervise their own sections in accordance with ESF and provide full access to WB staff for any due diligence they might need to carry out.

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:



Documents and actions prepared and completed prior to Appraisal

For RHD

- Preparation, consultation and disclosure of an ESIA/ESMP for Jessore – Jhenaidah Road
- Preparation, consultation and disclosure of RAP for Jessore – Jhenaidah Road
- TORs for ESIA and RAPs for the other roads to be implemented during project implementation
- Preparation, consultation and disclosure of the Stakeholder Engagement Plan (SEP)
- Institutional Capacity Assessment and Institutional Capacity Strengthening Plan for RHD
- Preparation and disclosure of Environmental and Social Commitment Plan (ESCP)
- Preparation and disclosure of Labor Management Procedures (LMP)

For LGED

- Preparation, consultation and disclosure of ESMF and RPF
- Preparation, consultation and disclosure of ESMPs and RAPs for year 1 investments
- Preparation, consultation and disclosure of the Stakeholder Engagement Plan (SEP)
- Institutional Capacity Assessment and Institutional Capacity Strengthening Plan for LGED
- Preparation and disclosure of Environmental and Social Commitment Plan (ESCP)
- Preparation and disclosure of Labor Management Procedures (LMP)

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

- Preparation, consultation and disclosure of an ESIA/ESMP for Bonpara - Hatikumrul Road (AIIB parallel financing)
- Preparation, consultation and disclosure of RAP for Bonpara - Hatikumrul Road (AIIB parallel financing)
- Implementation and monitoring of ESMP and RAP for Jessore – Jhenaidah Road and Bonpara - Hatikumrul Road
- Preparation, consultation and disclosure of ESIA for future RHD and LGED roads to be prepared during Project implementation
- Preparation, implementation and monitoring of the Construction ESMP (and associated sub-plans)
- Implementation of Institutional Capacity Strengthening Plan for RHD and LGED
- Development, consultation and disclosure of RAPs for future roads to be prepared during project implementation
- Implementation of Labor Management Procedures
- Implementation of Stakeholder Engagement Plan
- Conduct of strategic environmental and social assessment for the entire corridor and surrounding areas

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C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

15-Jun-2020

IV. CONTACT POINTS

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Borrower/Client/Recipient

Implementing Agency(ies)

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Satheesh Kumar Sundararajan, Jan Erik Nora, Rajesh Rohatgi
Practice Manager (ENR/Social)	Magda Lovei Recommended on 17-Jun-2019 at 11:02:57 EDT
Safeguards Advisor ESSA	Maged Mahmoud Hamed (SAESSA) Cleared on 18-Jun-2019 at 12:46:53 EDT

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