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

Concept Stage | Date Prepared/Updated: 14-Feb-2019 | Report No: PIDISDSC25406



BASIC INFORMATION

A. Basic Project Data

Country Pakistan	Project ID P166887	Parent Project ID (if any)	Project Name Transformation and Revitalization of the Fisheries Sector in Sindh - TRIFISH (P166887)
Region SOUTH ASIA	Estimated Appraisal Date May 08, 2019	Estimated Board Date Aug 01, 2019	Practice Area (Lead) Environment & Natural Resources
Financing Instrument Investment Project Financing	Borrower(s) External Affairs Division - EAD	Implementing Agency Department of Livestock and Fisheries	

Proposed Development Objective(s)

The Development Objective is to improve management and increase productivity and consumption of marine and inland fisheries and aquaculture in Sindh province.

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	300.00
Total Financing	250.00
of which IBRD/IDA	150.00
Financing Gap	50.00

DETAILS

World Bank Group Financing

International Development Association (IDA)	150.00
IDA Credit	150.00

Non-World Bank Group Financing

Counterpart Funding	80.00
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Borrower/Recipient	80.00
Trust Funds	10.00
Program on Fisheries	10.00
Other Sources	10.00
FRANCE: Govt. of [MOFA and AFD (C2D)]	10.00

Environmental Assessment Category

A - Full Assessment

Concept Review Decision

Track II-The review did authorize the preparation to continue

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Other Decision (as needed)

B. Introduction and Context

Country Context

1. Pakistan is the world’s sixth most populous country with a population of over 197 million people and a per capita income of around US\$ 1,547 (2017). Pakistan’s macroeconomic imbalances are increasing as the country enters a new political cycle. Economic growth reached 5.8 percent in FY18—0.4 percent higher than in FY17. On the demand side, growth was driven by consumption which contributed seven percentage points towards GDP growth. On the supply side, recovery in the agricultural and industrial sectors and consistent acceleration in the services sector contributed to the GDP growth. However, GDP growth is projected to decelerate to 4.8 percent in FY19 as authorities tighten fiscal and monetary policy to correct imbalances.
2. The national poverty headcount declined from 64.3 percent in FY02 to 29.5 percent in FY14, yet high inequality persists, and the country ranks low on the human development index (147th of 188 countries). The rural poverty rate remains about double the urban poverty rate. Pakistan did not meet many of its Millennium Development Goals (MDGs) by the 2015 target date. Macroeconomic, political, and security conditions, natural disasters, and unreliable power supply continue to constrain achievement of poverty elimination and shared prosperity goals.
3. Sindh is the second largest province of Pakistan: it covers 17.7 percent of the country and includes coastline



on the Arabian sea and the downstream reaches of the Indus River. It has a population of 50.4 million people (23 percent of Pakistan's total) and generates 27 percent of Pakistan's Gross Domestic Product (GDP). Nevertheless, poverty is pervasive and deep especially in rural areas. Forty-eight percent of Sindh's population lives in rural areas, and about 37 percent of that rural population lives below the poverty line, compared to 33 percent in Pakistan as a whole.

Sectoral and Institutional Context

4. Sindh is the home of Pakistan's fisheries sector, with marine capture fisheries, inland capture fisheries, and brackish and freshwater aquaculture. Pakistan's fisheries sector is estimated to produce over USD\$650 million worth of fish annually, . Of this, Sindh produces around two thirds: an aquaculture and inland capture component worth around US\$130 million, and an annual marine catch worth around US\$280 million . Sindh fisheries directly employ an estimated 137,000 people in the marine sector, and 29,000 people in the aquaculture and inland capture sectors, a majority of the total reported employment by this sector across Pakistan (over 390,000 direct jobs). The industry is estimated to support many more jobs indirectly, such as retailing, transporting, and distributing. Sindh is also home to important fisheries-supporting ecosystems, including the Indus River Delta, the largest dryland mangrove forest in the world, and numerous inland waterbodies.
5. The marine fisheries sector, which is centered in Sindh Province, is in decline due to overfishing. Capture fisheries' production is flat or declining, while fishing boat numbers are increasing. A comprehensive 2015 study, the Fisheries Resources Appraisal Project in Pakistan (FRAPP) concluded that the majority of Pakistan's commercial fish stocks are overfished. Nine of the fourteen major species groups are already depleted, and only two species groups show any indication that fishing mortality is at or below the limit required to maximize yields. The large shrimp fishery, worth approximately US\$48 million annually has an estimated 40 percent chance of collapse in the next 20 years. Furthermore, the marine capture sector is not as profitable as it should be due to high costs.
6. Sindh's aquaculture sector is growing slowly, due to constraints on private-sector investment, despite global trade opportunities and favorable agro-climatic conditions. While the Province has extensive resources of fresh and brackish water, aquaculture in Sindh is limited. The sector is dominated by low value, low-productivity carp production. Marine and coastal aquaculture, such as shrimp farming, are almost non-existent. Comparisons to neighboring countries are indicative of Sindh's (and Pakistan's) underperformance: Growth (nationally) is around 1.5 percent per year, while growth in India and Bangladesh are 6.8 and 9.5 percent respectively. Globally, aquaculture is one of the fastest growing food sectors, on the back of a global fish products demand gap growing at over 9 percent per year. Slow growth is a product of private sector uncertainty – due to a lack of a sector strategy, spatial planning, and biosecurity – and value-chain constraints.
7. Sindh's fishing communities are poor and vulnerable, with low incomes and poor nutrition. In addition to declining marine fish stocks, inland capture fisheries are also in decline due to ecological degradation, overfishing, and climate change. Participation in fisheries resource management at the community level is low. More than 60 percent of fishing households in communities in the Indus Ecoregion are living below the poverty line . In addition, Sindh's rural communities need improved sources of nutrition. Forty four percent of children (nationally) under the age of five are stunted physically and cognitively . Increased fisheries production could help by increasing incomes and fish consumption. Fish is a highly beneficial source of



proteins, healthy fats, and essential nutrients, important for child development and cognition. Aquaculture has the potential to provide communities – those currently engaged in declining capture fisheries, or not involved in fisheries at all – with new livelihood opportunities.

8. These challenges can and must be addressed to ensure Sindh fully realizes the economic and social potential of its fisheries sector. Commercial aquaculture has strong growth potential in the short to medium term, which will provide jobs and export revenues. Small-scale aquaculture techniques using indigenous fish species can support communities' nutrition and incomes. In the longer term, improved management of marine fisheries can prevent collapse and ensure sustainable growth in value and jobs. The benefits of investing across the sector are thus complementary: commercial aquaculture can drive growth while marine fisheries recover to provide longer term value. Throughout, small-scale aquaculture can support the livelihoods of the poorest.
9. Pakistan has good examples of high returns to private sector investment in aquaculture. Recent studies have examined private returns to fish farming in Pakistan, focusing on semi-intensive freshwater carp and tilapia operations in Punjab and brackish water carp culture in Sindh with cost benefit ratios at 1.17, 2.0, and 1.37-1.51 respectively. In the 1990s, ADB financed a US\$15 million project that constructed pilot/demonstration fish farms and hatcheries, and improved extension, training, and data collection systems in three provinces. The project's estimated annual value of fish production following completion was US\$13 million. Sindh can harness a similar strategy of public-private partnership investment in the base of the aquaculture value-chain (particularly in hatcheries and feedstock plants), to reduce impediments to private sector investment further up the value-chain. Investor certainly would also be helped through improvements in biosecurity, food-safety standards, and spatial planning.
10. Revitalizing marine stocks requires effort reduction to enable depleted fish stocks to replenish over time. Bioeconomic modelling suggests that Sindh's fisheries sector could be at least US\$35-70 million per year more profitable by 2030 under revitalization policies relative to business as usual. Realizing these benefits requires effective licensing, monitoring, surveillance and control operations, and the scientific capacity to set fish stock targets. It also requires coastal zone spatial planning to protect the ecosystems important for fish breeding. In turn, these require the relevant Provincial and Federal institutions to have clear mandates and sufficient capacity.
11. Returns to both commercial capture and culture fisheries can be further improved through improved post-harvest processing and value-add. Post-harvest processing in Sindh is characterized by poor quality control and outdated processing technologies. Much of the sector's capacity is focused on lower-grade products such as fishmeal. Limited capacity for high-quality and certified processing inhibits access to lucrative export markets. Poor sanitary and phytosanitary (SPS) conditions led the EU to impose an import ban for several years and continue to partially restrict access in a range of markets. Exports, which have averaged about US\$350 million annually in recent years, appear to have plateaued. Investments to improve SPS conditions at markets and auction halls, certification standards, competitive benchmarking, and market access development, can help.
12. Overcoming these challenges and realizing predicted benefits will require an overarching policy framework and institutional reform. Sindh and the Federal Government can take advantage of earlier strategy development efforts. The 2007 National Policy and Strategy for Fisheries and Aquaculture Development in Pakistan was not adopted at the time due to political transition but remains relevant. Alternatively, or in



addition, Sindh can develop its own provincial, sector-wide policy and strategy. Clarified mandates across institutions, strengthened institutional capacity, and updated policies and regulations will improve private-sector investment and ensure the sustainability and productivity of fisheries resources for the long term.

Relationship to CPF

TRI-FISH is consistent with WBG Pakistan CPS (FY15-19) in the following areas:

- Pillar II: Supporting private sector development
- Pillar III: Reaching out to the underserved, neglected, and poor
- Cross-cutting theme: Leveraging regional markets

C. Proposed Development Objective(s)

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The Development Objective is to improve management and increase productivity and consumption of marine and inland fisheries and aquaculture in Sindh province.

Key Results (From PCN)

- X percent increase of Sindh coastline under sustainable management
- X number of fish stocks under sustainable management
- Increase in private sector participation (#) in sustainable commercial aquaculture
- X percent increase in aquaculture productivity
- X percent increase in dietary diversity among target beneficiaries
- X percent increase in income among target beneficiaries
- Increase in score (#) on institutional reform process
- Increase in score (awareness index, #) on awareness for behavioral change

D. Concept Description

The project would consist of the following four components:

1. Sustainable Capture Fisheries Management

To improve the sustainable management of select sites and fish stocks. Activities could include:

- Develop, adopt, and implement inland, coastal and marine spatial plans, including addressing "fish plastic" issues
- Develop vessel registration, licensing, and MCS system for overfishing reduction
- Develop and implement FMPs (data collection and system for improved decision making)

2. Sustainable Aquaculture

To incentivize private sector investment to improve productivity and competitiveness. Activities could include:

- Develop and adopt Sustainable Aquaculture Policy (including spatial planning and business-friendly licensing)



arrangements)

- Develop Fisheries Development Fund (for investments in aquaculture value chains and productivity enhancing activities)
- Develop capacity for biosecurity (quarantine, diagnostic capability, response protocols)
- Technology-enabled training and extension
- Aquaculture Center of Excellence (research)

3. Sustainable Livelihoods, Nutrition, and Community Empowerment

To increase dietary diversity and income of target beneficiaries. Activities could include:

- Incentive and extension support for homestead fish farming and value additions, especially for women, including small fish solutions;
- Develop framework for co-Management and responsible artisanal capture fishing
- Incentives and support for alternative livelihoods to diversify incomes in vulnerable capture fishing-dependent communities

4. Institutional and policy strengthening, public awareness, and project management

To support institutional reform and awareness raising for strengthened institutions and stimulating behavioral change.

Activities could include:

- Strengthen national coordination and decentralized implementation (18th amendment vis a vis fisheries)
- Develop and adopt Provincial fisheries strategy and policy
- Training for DoLF employees
- Formal education for DoLF employees
- Restructuring and reform support for DoLF (DLI)
- Public awareness campaign
- Project management

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SAFEGUARDS

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

The project focus is to improve management and community benefits from fisheries and aquaculture in Sindh. The proposed project could include part of the following sectors: (i) marine sector comprises of commercial trawlers and gillnetters, smaller artisanal boats; (ii) brackish water zone, comprising intertidal rivers and creeks with a combination of capture and aquaculture (particularly shrimp); and (iii) inland fresh water zone with large inland fisheries and extensive (low productivity) aquaculture. Federal policy work and institutional strengthening (technical assistance type and purchase of equipment's) will reach marine areas with implications nationally. Physical investment, mostly related to aquaculture, will be located in Sindh province.

The area for inland aquaculture consists mostly of alluvial plains flanking the Indus River, the Thar desert in the eastern portion of the province, Kirthar Mountains in the western part and the Arabian Sea in the south of the province. Sindh lies in a tropical to the subtropical region; it is hot in the summer and mild to warm in winter. Although Sindh has a semi-arid



climate, through its coastal and riverine forests, its huge freshwater lakes and mountains and deserts. The province is mostly arid with scant vegetation except for the irrigated Indus valley.

Variety of wetlands are present in Sindh in which 10 important wetlands are of International Importance (Ramsar Sites). Besides these, there are many natural and artificial freshwater and brackish lakes that exist all over the Province. The major portion of the Sindh coast is habited with a larger stand of Mangrove forest in the Indus Delta region including marshy and open mudflats areas dominated by resident and migratory birds. These wetlands serve as the main source of livelihood and food security of many marginalized and poor people of the province.

The coastal strip and the creeks abound in semi-aquatic and aquatic plants and the inshore Indus delta islands have mangrove forests of *Avicennia marina*, *Ceriops tagal* and *Rhizophora mucronata* trees.

The protected areas of Sindh comprise of national parks, wildlife sanctuaries, and game reserves. The Pallo (Sablefish), a marine fish, ascends the Indus annually from February to April to spawn. Many people in semi urban and rural Sindh are associated with the fishing occupation both capture and culture fisheries.

B. Borrower's Institutional Capacity for Safeguard Policies

Federal policy work that would be supported by this project will involve federal institutions. No physical investments will be supported. Activities to be implemented will include institutional strengthening, technical assistance and purchase of equipment to improve enforcement and control. The aquaculture component of the project will be implemented by Sindh Livestock and Fisheries department with their administrative setup at district levels. The Sindh Board of Investment and Provincial Fisheries Development Board will implement the values chains related activities. The department of fisheries currently implementing the Bank funded sectoral activity related to construction of fish ponds under Sindh Stunting project. Beside that other implementing agencies have no any direct and indirect experiences in implementing the Bank-financed projects.

The capacity of above mentioned borrower departments is low in implementing safeguards requirements in a complex project. Their capacity to manage economic and physical displacement, implement labor laws especially relating to workplace safety and code of conduct, especially for women is extremely low. Moreover, grievance redress for exclusion and gender exploitation is absent from these departments. Given that fisheries sector involves a lot of informal women labor where many are Bengali and Burmese illegal migrants/refugees, mainly involved in net weaving and shrimp peeling industry in the marine fisheries, there is a high risk of increased marginalization of these vulnerable communities.

The Environmental and Social Assessment process will identify specific measures to increase the existing capacity. Such capacity building measures would include but not limited to hiring the dedicated environmental and social safeguard specialists in the implementing agencies, comprehensive environmental and social management training programs particularly focusing on the key environmental and social risks and impacts such as OHS, water quality, labor influx and management, GBV and involuntary resettlement, and hiring a third-party monitoring firm.

C. Environmental and Social Safeguards Specialists on the Team

Rahat Jabeen, Environmental Specialist
Babar Naseem Khan, Social Specialist

D. Policies that might apply



Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>This policy is triggered because the project will involve physical intervention under component 2 &3 such as basic civil works and aquaculture infrastructure for value chains: hatchery, processing facility upgrades, fish market upgrades, etc. rehabilitation of existing ponds; new pond development on wasteland, homestead ponds. In terms of risks, the main challenges of pond fish farming are poor siting (design, size, location) and improper pond management which lead the problems with soil, water supply, drainage, and conflicting land use practices. Above these, one of the main issues is the flushing or exchange of pond water which could deteriorate the water quality in the pond, . Another challenge is the introduction of exotic species in both culture and capture fishing. In Sindh, the fish farms receive water supply from the main irrigation system, which could be polluted, and the pond discharges could impact on the irrigation water supply in the canal network. Coastal pond aquaculture practices could cause the destruction of the fragile coastal ecosystem and habitats which is almost facing the numerous environmental challenges.</p> <p>In order to address these risks, the project will (i) adopt spatial planning for aquaculture. This will include the design and implementation of specific aquaculture zoning, site selection and area management under the ecosystem approach to aquaculture. Spatial planning is one of the activities included in the initial project design, (ii) Preparation and adoption of Guidelines for Environmental Management of Aquaculture Investments (including value chain), including cumulative, indirect and induced impacts. This will include measures to promote the construction of “blue-green” infrastructure for aquaculture, value chains, and hatcheries, and (iii) Implementation of activities to strengthening institutions for aquaculture management. The bulk of the project seeks to address the existing capacity gap which is key to improve the economic benefits of this economic activity. As a consequence key project activities will include public institutions capacity building, mass organizations and NGOs, private sector capacity building, build capacity of local institutions to coordinate efforts and implement legislation and strategies, and cross-</p>



sectoral coordination Based on these parameters, the project is classified as Category A. Expected impacts are not expected to be sensitive, diverse, or unprecedented, and should be focused to the sites or facilities subject to physical works. The project will exclude natural habitats for physical works, so the conversion/alteration of natural habitats is not expected. There will be no generation of hazardous materials and the potential effects related to pollutant associated to farm ponds should be managed by already proven technologies. No major resettlement is expected. The project will address the capacity gap as per the proposed design.

An Environmental and Social Management Framework will be prepared for components 1-3, since the location and details of the physical intervention will not likely to be known at Appraisal and will rely on the spatial planning exercises. ESMF will incorporate the risk management strategy described before. ESMF will include the analysis of key and specific potential environmental and social risks and impacts, e.g. those on mangrove forests and important wetlands, associated with the project, in particular, cumulative and long term risks/impacts due to improper siting, insufficient pollution management, use of water and introduction of exotic species etc. resulting from the project intervention such as pond rehabilitation/development, installation of aquaculture infrastructures and hatchery. The level of details of such analysis will be commensurate with the level of available relevant information including project design and location at the time of ESMF preparation. The ESMF will also provide the guidance on the procedures and requirements to be followed to prepare the site-specific mitigation measures/safeguard instruments when necessary, including environmental and social screening which will guide the type of site-specific mitigation measures/instruments to be required for each physical intervention, and generic Environmental and Social Management Plan (ESMP)/Environmental Code of Practices (CoP). The project will also adopt the World Bank EHS guidelines. A Physical Cultural and Heritage Resource Framework (PCHRF) will be developed and annex in the ESMF. The project will support preparation of spatial plans under Component 1 and



preparation and adaptation of Guidelines for Environmental Management of Aquaculture Investments (including value chain) as key tools to reduce and mitigate the potential E&S risks and impacts. Therefore, ESMF will include (i) the documentation as to how environmental and social consideration will be integrated into the spatial plans, and (ii) ToR of Guidelines for Environmental Management of Aquaculture Investments. Broader social issues in fisheries sector other than economic and physical displacement under OP4.12 (such as exploitation/loss of income of informal workers including immigrant women, labor influx, GBV, OHS and child labor) will also be addressed in the.

The project will have a functional GRM in place, which should be designed in ESMF.

The project implementing entity will develop the safeguard documentation (ESMF) prior to the appraisal.

These will be cleared by the Bank and will be disclosed at the Livestock Fisheries Department and WB image bank websites.

Performance Standards for Private Sector Activities OP/BP 4.03	No	The project will not involve private sector led activities.
Natural Habitats OP/BP 4.04	Yes	The project will exclude the use of natural habitats. The ESMF will develop a negative list to ensure these type of habitats is screened out. In addition, the ESMF will include specific criteria to assess the physical investment with a watershed approach as the fishes' aquaculture ponds may impact the wetlands habitats and potentially can cause deterioration if stringent methods of management and protection of fish ponds would not be adopted. Therefore, this policy is triggered under a precautionary basis. The project will develop the Sustainable Fisheries Management plans as mitigation measures prior to Implementation.
Forests OP/BP 4.36	Yes	For inland aquaculture activities, the project will be in non-forested area as defined by the policy, and likely to have no direct or indirect impact on forests. However, aquaculture in coastal areas could directly affect the mangrove forest therefore. The spatial planning to be supported by the project will seek to avoid this type of sensitive environments. The policy is trigger under a precautionary basis..



Pest Management OP 4.09	No	The project interventions do not involve the use of pesticides, either directly or indirectly.
Physical Cultural Resources OP/BP 4.11	TBD	This policy will be assessed during the preparation stage and will then be triggered if it applicable. appropriate plans will be developed, if relevant.
Indigenous Peoples OP/BP 4.10	No	The project does not involve any indigenous people.
Involuntary Resettlement OP/BP 4.12	Yes	Fisheries sector in Sindh is highly informal and exploitative in nature. It is plagued with various types of organized illegal businesses, (middlemen) loan sharks and powerful sea lords. Illegal businesses include buyers and processors of juvenile fish for poultry feed, illegal net making industry, ice making industry, boat fuelwood sellers, etc. Although illegal, all these activities are thriving businesses employing thousands of people, under dangerous, unhealthy work environments, hired on exploitative wages. Shrimp peeling and net making industries primarily employ illegal Bengali and Burmese women migrant workers as they know the craft and take lowest possible wages due to their status. Similarly there are numerous informal jetties across Sindh for marine and inland fish catch, mostly built on government land, or having no legal status. Any intervention the Project takes to sustainably manage fisheries has high chances of economic displacement, loss of livelihood, forced evictions, etc. In order to make fishing activities and fisheries as a whole sustainable, restrictions and controls may be put in place on use of illegal nets, juvenile fish catch, eviction of small, landless fishermen encroaching government land to construct modern fish markets, improved and formal jetties etc. A ban on use of illegal nets would economically displace the labor force associated with the trade, and in many cases lead to loss of livelihoods. The same will be the case with all other informal, mostly illegal businesses (fuelwood extraction from protected mangroves, sale of juvenile fish, decommissioning of informal jetties and landing sites, etc.) which will have to be restricted or banned in order to transform and revitalize fisheries, rendering many economically displaced and/or negatively affecting their livelihoods. A standalone RPF will be prepared while the ESMF will focus on broader social issues associated with the fisheries sector.



Safety of Dams OP/BP 4.37	TBD	This policy could be triggered since the project activities could rely (for water provision) on the performance of the two major barrages in Sindh province, i.e. Sukkur Barrage and Kotori Barrage in Indus River, which are not dams but are large scale hydraulic structures across a river to increase the depth of water and to divert it into canals for irrigation and other purposes. GoSindh has already established a panel of expert (POE) comprising four members (sediment, structure, hydrology and electro-mechanics specialists), who reviewed and cleared the feasibility study for Sukkur Barrage rehabilitation, which is supported by the Bank financed Sindh Barrage Improvement Project (SBIP). The POE will review the relevant dam safety plans and procedures for Sukkur and Kotri Barrages which are relevant to the project. The team will confirm if this policy is triggered during preparation.
Projects on International Waterways OP/BP 7.50	TBD	Since Component 2 and 3 involves the construction of physical infrastructure (aquaculture ponds) that could take water from canals connected from Indus River which is International Waterway, this policy could be triggered. In the marine space, the project will not support any activities outside of the boundaries of the Pakistan EEZ.
Projects in Disputed Areas OP/BP 7.60	No	The project does not involve disputed areas.

E. Safeguard Preparation Plan

Tentative target date for preparing the Appraisal Stage PID/ISDS

Jul 31, 2019

Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing should be specified in the Appraisal Stage PID/ISDS

An Environmental and Social Management Framework (ESMF) will be developed prior to project appraisal. A Social Assessment leading to a Social Management Framework will be prepared to analyze and manage indebtedness in fisherfolk communities, impacts on livelihoods and mitigation measures, social mobilization strategy ensuring social inclusion, Gender Analysis focusing on women workforce in fisheries; threats and opportunities and vulnerability analysis of marginalized fishing populations.

Resettlement Planning Framework will be prepared before appraisal focusing on economic displacement and management.



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APPROVAL

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