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

Concept Stage | Date Prepared/Updated: 10-Feb-2017 | Report No: PIDISDSC20618

BASIC INFORMATION

A. Basic Project Data

Country	Project ID	Parent Project ID (if any)	Project Name
Iraq	P162094		Baghdad Water and Sewerage Improvement Project (P162094)
Region	**Estimated Appraisal Date**	**Estimated Board Date**	**Practice Area (Lead)**
MIDDLE EAST AND NORTH AFRICA	May 01, 2017	Jul 06, 2017	Water
Lending Instrument	**Borrower(s)**	**Implementing Agency**	
Investment Project Financing	REPUBLIC OF IRAQ	Mayoralty of Baghdad	

Proposed Development Objective(s)

The Project Development Objective (PDO) is to increase the reliability and continuity in drinking water supply services as well as to improve wastewater collection and its treatment in Baghdad.

Financing (in USD Million)

Financing Source	Amount
International Bank for Reconstruction and Development	210.00
Total Project Cost	**210.00**

Environmental Assessment Category	Concept Review Decision
B-Partial Assessment	Track II-The review did authorize the preparation to continue

Other Decision (as needed)

B. Introduction and Context

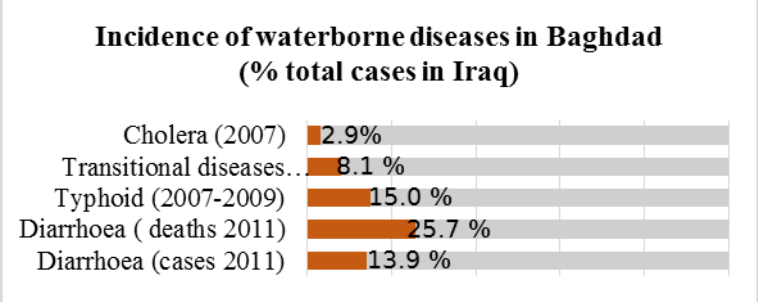
Country Context

1. In 2013, the population of the Republic of Iraq was estimated at around 33 million, of which 66 percent lived in urban areas. About 27 percent of the total urban population in Iraq resides in Baghdad, which is by far the largest city in the country with an estimated population of 6 million. A 2012 household survey indicates that Iraq's national poverty stood at 18.9 percent in that year and that a fifth of the population lived on less than US$2 a day, and 70 percent on less than US$4 a day. The poverty rate in 2012 in Baghdad was at 12 percent. The recent conflict will have exacerbated poverty levels. Progress made in poverty reduction between 2012 and 2014 has been reversed. Unemployment is high and labor force participation remains low, especially for women and youth. It was officially estimated at 11 percent in 2011, although actual levels, particularly among youth, were significantly higher.

2. The current government, in place since September 2014, has detailed a reform plan to build a more transparent state that delivers better services to the public, as articulated in the Prime Minister's acceptance speech to Parliament. The main challenge for Iraq is the incremental and long-term rebuilding of state institutions that were systematically weakened over the last thirty years. Despite the complex political situation, the authorities are committed to implementing the government program for 2014-2018. The first strategic priority of the program is to reach security and stability by liberating cities and provinces controlled by terrorist groups, and by restoring the rule of law. The second priority is to deliver public services and upgrade standards of living. This includes delivering water and electricity services, improving health and education sector performance, and reforming the social protection system.

3. The economy remains vulnerable to the country's ongoing security problems which impede investment and inhibit private economic activity. Security threats and a fall in oil prices, the main revenue source for the Government of Iraq (GoI), have compounded economic decline and worsened the fiscal situation. The economy grew at 0.1 percent in 2014 and 2.9 percent in 2015, from a 4.2 percent growth in 2013. While oil production was increased over time despite low oil prices, non-oil-GDP has contracted by 5.1 percent in 2014 and 13.9 percent in 2015. High dependence on the oil sector makes the overall economy suffer from structural weaknesses.

4. Poor public service delivery, reflected especially in significant water and electricity shortages, are binding constraints on the population's quality of life and private sector development. Safe drinking water and basic sanitation is of crucial importance to the preservation of human health, especially among children. Baghdad is one of the governorates most impacted by outbreaks of waterborne diseases. About 14% of diarrhea cases registered in 2011 occurred in Baghdad, which also topped the governorates in terms of number of deaths from diarrhea (see figure). Similarly, the incidence of typhoid and other waterborne diseases is higher in Baghdad compared to national averages. Contaminated water supplies and improper disposal of sewage force families to spend a significant fraction of their income to medical treatment and to the purchase of water from expensive private vendors.



Sectoral and Institutional Context

5. The GoI has recognized that its social contract with citizens is dependent on the improved provision of basic services. The recent constitutional reforms which give increased authority and responsibility to governorates for provision of services is intended to strengthen direct accountability for public service provision to customers through decentralization.

6. The recent decentralization process has brought greater autonomy and challenges to the water and sanitation sector, but few investments. Provision of water and sanitation services are now functions of the governorates, in line with modern practices that encourage moving services closer to consumers, and promise efficiency and accountability in service delivery. The objective of the policy of bringing services closer to the people and away from the old system of central planning and implementation is sound, but it will require a lengthy process of capacity building.

7. The incentives for the governorates to address the sector issues in a comprehensive manner are not aligned with their new responsibilities. Central government resource transfers are currently based on the needs of the governorates, irrespective of their performance or compliance with national requirements and targets.

8. Before private sector engagement can be considered in Iraq's water supply and sanitation sector, and before there is a chance of achieving cost-recovery, fundamental improvements in performance, institutional development, and revenue cycle management will need to be implemented. In the short term the GoI will need to work within its existing structures to reduce losses, improve revenue flows, improve management and financial information systems, modernize water laws and regulations, and meet minimum levels of commercial performance. The Bank's "Doing Business" report of 2016 ranked Iraq still as very low in "ease of doing business", with a regulatory environment that is still not favorable to the private sector.

9. The recently completed GoI's Water and Land Strategy (2015-2035) indicates that for the next 20 years the GoI must invest US$22 billion in drinking water supply and US$57 billion in wastewater treatment. The Water GP will continue to work with IFC and PPIAF in identifying specific PPP opportunities. A key incentive would be a more rational tariff policy that enables water and wastewater providers to recover the costs of the services and provide users with higher quality services. However, tariff policies will only be embarked upon as part of a larger program that includes better revenue management (collection and billing procedures) and more cost efficiency in the provision of services

10. The municipal water and sanitation sector is governed by a complex institutional framework. It is predominately managed by three ministries, namely the Ministry of Water Resources (bulk water supply), the Ministry of Construction and Housing (MoCH), and the Ministry of Municipalities and Public Works (MoMPW). Although the MoMPW is in charge of the planning and development of many of the municipal water and sanitation projects, the final approval for such projects is given by the Ministry of Planning, while the Ministry of Finance has to approve budget. Coordination mechanisms between various ministries and the governorates are not very well developed. Greater coordination between national and provincial planning processes, especially with regard to annual budget formulation is necessary to improve service delivery. The

governorates need to be included in the decision-making process. Technical assistance could be introduced to harmonize budget procedures, and to align procurement, disbursement, and project monitoring procedures.

11. The transition from a central to a decentralized structure remains a work in progress. The new governorate structure is still under preparation by the governorates. It will be reviewed by the Provincial Council and then submitted to the Council of Ministers and the Council of Representatives.

12. The Mayoralty of Baghdad (MoB) has its own status and is empowered to prepare and implement plans for municipal and water projects. Law number 16 of 1995 provides for the organization of the Mayoralty of Baghdad, which manages the Baghdad Water Authority (BWA) and the Baghdad Sewage Authority (BSA). The first article of the law states that the Mayoralty shall provide the municipal services in Baghdad. Three Deputy Mayors support the Mayor in his duties. Article 8 states that the water supply system for Baghdad city shall be managed and operated by the BWA.

Baghdad Water and Sewerage Services

13. The city of Baghdad and its suburbs cover 950 km^2 and is administered by the MoB. The city is divided into 14 municipalities. The water and wastewater services are administered centrally by the BWA and the BSA, which are responsible for all infrastructure assets. As far as water supply and sewerage are concerned, the municipalities' role is limited to installing house connections and to maintaining neighborhood networks (pipes under 200 mm diameter). The planning and implementation of investment projects in the municipalities is the responsibility of the MoB.

14. The Tigris is the only source for drinking water in Baghdad. The average flow is 21.2 billion cubic meters. The BWA operates 11 water treatment plants which prouce an estimated 3.5 million cubic meters per day (6% of the average annual flow of the Tigris). There are 13 reservoirs providing a total storage capacity of about 1,058,000 m^3. About 53% of storage capacity is located on the Rasafa (east) side of the city, while 47% of storage capacity is located on the Karkh (west) side. The number of service reservoirs is inadequate and the present capacity of storage is insufficient throughout the system, but the water supply system on the Rasafa side is especially facing severe shortages.

15. Flow meters at the point of discharge into the network are not available, or are malfunctioning. About 23% of the existing service connections are metered with water meters. Therefore, it is difficult to assess water losses precisely. However, some studies have estimate unaccounted for water, and these ranged from no less than 50% to 60%.

16. The sewer system consists of a network which covers about 92 percent of the city area. Baghdad has two main wastewater treatment plants, one in Rasafa called "Rustomiya", and another one in Karkh. The efficiency with which these wastewater treatment plants and the (old) pumping stations are operated has dropped significantly (by an estimated 30 to 50 percent). The plants, therefore, are not operating effectively allowing at least 0.4 MCM of untreated wastewater to flow directly into the Diyala and Tigris.

17. The capital area is unable to maintain access to water supply services in the context of rapid population growth. In 2012, 95 percent of the households in Baghdad used piped water compared to 99 percent in 2007. Like in the rest of the country, service delivery in the capital city is characterized by perceived low quality of drinking water and frequent supply interruptions. About 20 percent of the population in the capital city uses

bottled water for drinking. Only 26 percent of the population of Baghdad does not experience any service interruptions. About 18 percent of the population has to deal with daily service interruptions, and in the hot summer months, service interruptions are even more frequent. In 2012, 22 percent of Baghdad's population mentioned problems with sewers. Leakage from sewer pipes is contaminating potable water networks and groundwater aquifers, which aggravate health and environmental problems. Also, there is a problem with illegal discharges of septic sewage collected from houses into rivers or onto land.

18. Existing water tariffs are low and do not cover the cost of water and wastewater treatment. Residential water tariffs stand at ID10 (Iraqi dinar) per cubic meter (US$0.0086) for the first 30 cubic meters of water per month. The tariff structure is an increasing block rate tariff with four blocks of each 30 cubic meters per month. Industrial and government water tariffs are at about ID100 per cubic meter. The tariff for sewerage services is the same as water services. These rates are low, compared to the average operation and maintenance costs of the water services which were estimated at ID155 per cubic meter in 2013 (US$0.13). Despite the low tariffs, a large part of the population does not pay their water bill, which may be linked to dissatisfaction with the quality of the services but is also linked to certain policies that does not allow the BWA and BSA to charge certain groups of residential consumers, and the high transaction costs of paying very small water bills in the absence of a well-functioning banking system in the country.

19. Data from a recently prepared Public Expenditure Review for the Water Sector in Iraq (WB report number 96309- IQ, November 2015) show that the government funding to the MoB is highly volatile. Between 2007 and 2012, budget allocations to the MoB have seen a pattern in which one year shows a rapid increase in funding followed by a year of rapid decrease. The operating budget for the BWA vacillated between ID6 and ID57 billion annually between 2007 and 2012. It is clear that such large swings in budget allocations will result in a high cost of doing business as delays in payments are going to negatively affect the time it takes to implement projects, the quality of the implementation, and the associated costs, while it will also result in the postponement of maintenance affecting the longer-term sustainability of the infrastructure in place.

Relationship to CPF

20. The proposed project is consistent with the Bank's twin goals of ending extreme poverty and promoting shared prosperity. Improving water security and increasing access to safe drinking water and sanitation are key to improving livelihoods and health. The project will support three interlinked objectives: shared prosperity through support for economic growth, increased sustainability by protecting the natural resources base on which these goals are built, and ending extreme poverty through support for improved access to water and sanitation services. The project support for water and sanitation services in the city of Baghdad, which houses about 27 percent of the country's urban population, will contribute to the country's effort to meet the United Nations Sustainable Development number 6 on ensuring availability and sustainable management of water and sanitation for all.

21. The Bank's Country Partnership Strategy (CPS) for Iraq FY13-17 (Report No. 73265-IQ), per the CPS Performance and Learning Review (Report No. 94767-IQ) is centered on: (i) delivering basic public services, especially in areas where the security threat has diminished, reducing poverty, and enhancing citizens' trust in government institutions, and (ii) addressing and helping to manage the country's critical fiscal situation, and helping to increase opportunities for private investors. The project contributes to the first pillar of delivering basis public services (drinking water and sanitation). However, the project also contributes to the second pillar,

by increasing efficiency, accountability and transparency in public resource use for service at the governorate level.

C. Proposed Development Objective(s)

22. The Project Development Objective (PDO) is to increase the reliability and continuity in drinking water supply services as well as to improve wastewater collection and its treatment in Baghdad.

Key Results (From PCN)

- Direct project beneficiaries (number), of which female beneficiaries (%) (core indicator).
- People provided with access to improved drinking water supply.
- People provided with access to improved sanitation facilities.
- Improvements in storage capacity and reduction in non-revenue water.
- Improvements in the overall operational performance of BWA and BSA.

The project beneficiaries will include

- 825,000 consumers benefit directly from improved water supply services in the project areas
- 5,000,000 consumers benefit directly from rehabilitated and upgraded sewer pumping stations
- BWA and BSA will benefit from improvements in their technical, operational and financial performance
- Central government will benefit from an improved fiscal performance

D. Concept Description

23. The proposed project will support improvements in high-priority water and wastewater services that were identified in the recent Master Plan for Baghdad to help the MoB to improve its performance in water and wastewater service delivery. The proposed project combines institutional, technical and operational steps to be undertaken by the BWA and BSA, while ensuring that they improve their financial situations. In addition, this project also aims to identify (and selectively address) key challenges and opportunities in the decentralized institutional framework in Baghdad in order to support decentralization in other parts of the country. The proposed project will incorporate lessons learned from the Emergency Baghdad Water Supply and Sanitation Project (Annex 2).

24. **Component 1: Institutional strengthening for water security and integrated urban water management (US$10 million).** This component will support the MoB in operational and strategic decision making with regard to the city's water security and water conservation. The focus will be on improving the institutional knowledge and preparedness with regard to all aspects of water security and urban water management, including resilience (climate change adaptation measures), sustainability of water use, the potential use of groundwater, and the use of non-conventional water (reuse of wastewater).

25. This component will also support the BWA and the BSA in assessing the effectiveness of the current billing and collection practices, including the practices related to customer databases, levels of metered and

unmetered service provision, billing structure and cycles, practices, and delivery, staff capacity, efficiency in billing and collection, facilities for customer's payments and enhancing internal audit function. The assessment will report the deficiencies and recommend the necessary corrective measures that would have immediate impact on the revenue streams of BWA and BSA.

26. This component will also support the BWA and the BSA in assessing the current management information system (MIS), and develop system requirements for a more comprehensive and reliable integrated MIS that would support different operations (inventory management, assets, accounting and finance, cash management, and billing and collections).

27. **Component 2: Investment in drinking water supply and wastewater infrastructure (US$190 million)** will cover:

28. **(a) Performance-based contract for non-revenue water reduction (US$20 million).** This will ensure that BWA improves its operational efficiency through the introduction of measures to manage demand and reduce losses. Through a performance-based non-revenue water (NRW) contract, leakage reduction activities will be carried out in targeted locations to improve services (for approximately 1 million people) and save enough water to serve more people. The scope of the contract will include creation of district metering areas, preparing an accurate customer database, reducing physical losses, and establishing an NRW management system. Implementation of a SCADA system will provide BWA with the means to efficiently and effectively monitor and control the water supply system and to improve operational performance. The SCADA system will provide BWA with accurate online measurements of water transfer, storage and supply to the network and will allow optimization of the operational and maintenance costs, management, and fair distribution of water.

29. **(b) Rehabilitation of Dora water treatment plant (US$40 million).** The Dora district is located in the southern part of Karkh, with a population of approximately 500,000. The existing water treatment plant was constructed in 1983 and currently services 225,000 people. The remaining population is served by a neighboring system in the Rasheed district affecting the quality of the services which are now characterized by low pressure and low flows. The Dora treatment capacity will be increased from 5,000 m^3/hour to 10,000 m^3/hour.

30. **(c) Construction of the "R2" reservoir (US$70 million).** Water distribution needs high pumping pressures at the source in order to convey water to remote areas without interruptions. The pumping pressure is currently very irregular due to the direct pumping from the network, and flows do not meet peak demands during the day due to lacking water backups/storage at some point on the network. This situation is leading to operational problems and service interruptions. The "R2" reservoir, to be built on the Rasafa (east) side of Baghdad, with a capacity of 150,000 m^3 will provide more stability to the supply system by minimizing high pressures, securing enough water for end users. Building the R2 complex will help eliminate direct pumping into the distribution network which currently generates high pressure variations. It will ensure improved quality and reliability of the water supply services in the area served by the reservoir complex, which will serve more than 550,000 people in the Al Sha'ab district. The reservoir will also benefit the larger Baghdad water supply system as it will alleviate pressure on adjacent pressure zones, and hence benefit people living in areas adjacent to the Sha'ab district with improvements in the reliability of their service.

31. (**d) Rehabilitation of the Dora sewerage pumping station (US$15 million).** The Dora pumping station in Karkh was constructed in the 1980s. It consists of 13 vertical sewerage pumps with a design capacity of

about 13.5 m^3/sec. The current capacity is 9 m^3/s. The pumping station serves a population of 2.5 million and transfers the sewage collected to the Karkh sewage treatment plant (capacity of 405,000 m^3/day).

32. **(e) Rehabilitation of Habibiya sewerage pumping station (US$13 million).** Constructed in 1984 in Rasafa (east) with a design capacity of 11 m^3/sec. The pumping station serves a population of around 2.6 million and transfers the sewage to the Rustomiya wastewater treatment plant (capacity 550,000 m3/day).

33. **(f) Rehabilitation of sewage and storm water pumping stations in Rasafa (US$32 million)**. There are 22 sewage and storm water pumping stations that need full rehabilitation. The pumping stations are of different capacities (from 100 to 20,000 l/sec) and transfers the sewage to the Rustomiya wastewater treatment plant (capacity 550,000 m3/day).

34. **Component 3: Project implementation and M&E component (US$10 million**). This component will finance a project implementation consultant (engineering, and construction supervision and quality control), feasibility studies for future projects (preparation of future priority investments for a water security project), and the operational costs of the project implementation teams who will coordinate, implement, supervise and monitor the project. This component will also finance training, and other technical assistance activities to improve the capacity of BWA, BSA and MoB staff in implementing the project.

SAFEGUARDS

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

Project interventions are spread across Baghdad, the capital city. The identified areas at this stage of preparation includes the following areas: (1) Al Doha area, located in Al Karkh side, south of Baghdad; (2) Al Rasheed, also located in the south of Baghdad; as well as (3) Al Dora, Habibiya and Rusafa, all located in the north of Baghdad. The preparation support visit will obtain preliminary information on physical locations and site characteristics for the 25 sewerage pumping stations in Rusafa.

B. Borrower's Institutional Capacity for Safeguard Policies

The overall responsibility for the project lies with the Mayoralty of Baghdad (MOB). The proposed management structure for the project incorporates lessons learned from the implementation of the Emergency Baghdad Water Supply and Sanitation Project (EBWSSP) that was approved in 2004. In that project, a Project Management Team (PMT) was set up at the MOB level. In this newly proposed project, the day to day management of the the implementation of this project (including safeguards implementation), will be the responsibility of the Baghdad Water Authority (BWA) and the Baghdad Sewerage Authority (BSA). Project implementation teams (PITs) in BSA and BWA have been established. The PITs are supported by the PMT at MOB level. The PMT will continue to be responsible for overall project coordination, including safeguards implementation, monitoring and reporting.

Current safeguards capacity in the MOB (including BSA and BWA) is adequate. The BSA and BWA have benefited from extensive training on environmental and social safeguards. However, much of that training was during project preparation and the initial year of project implementation (the mid-2000s), and will have to be extended to BSA and BWA operating the systems. Subsequently, there has been both staff turnover and changes in the safeguards modality (e.g.

from ESSAF to ESIA/ESMF). It is expected that governmental capacity will need to be augmented by technical consultants in the safeguards design phase. The MOB will also benefit from support and guidance from the Bank environmental and social team members.

C. Environmental and Social Safeguards Specialists on the Team

Tracy Hart, Chaogang Wang, Ibrahim Ismail Mohammed Basalamah

D. Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	This project is categorized as "B" due to potential adverse environmental and social impacts which are site-specific and reversible; thus easily remediable by applying appropriate mitigation measures. These potential adverse environmental impacts may include the following: air quality and noise; construction debris, including old piping and sewerage infrastructure requiring proper disposal; employee health and safety issues; vehicular and pedestrian traffic disruptions; disruptions in water supply; and risk of water contamination in the existing system. An ESIA with a detailed ESMP has each been prepared for three known interventions (R2 Water Reservoir; Al Habibiya and Al Doura Sewerage Pumping Stations), a generic ESMP for 22 other sewerage pumping stations, and an ESIA/ESMF has been prepared for Al Doura Water Treatment Plant, where design feasibility is not yet completed. In addition the specific ESIA/ESMP of the sites will include an assessment of the cost recovery of the billing and collection practices. The assessment will include willingness and ability of the beneficiaries to pay for services provided and the preferred methods and also justifications for non-payment.These environmental safeguards instruments need to reviewed, cleared, and disclosed in-country and at the Bank's Infoshop prior to appraisal.These environmental safeguards instruments will need to be disclosed in-country and at the Bank's Infoshop prior to appraisal.
Natural Habitats OP/BP 4.04	No	This policy is not triggered.
Forests OP/BP 4.36	No	This policy is not triggered.
Pest Management OP 4.09	TBD	WWTPs can be attractors of pests, particularly flies and rodents. Pest management could be necessary during the operations phase to manage these

		nuisances. The ESIAs/ESMPs will further review this issue during preparation.
Physical Cultural Resources OP/BP 4.11	TBD	The ESIAs/ESMPs will further review this issue during preparation.pending review during preparation, and ensure that appropriate Chance Finds procedures will be put in place even if confirmation from relevant ministries or experts confirm that no PCR is present in the project areas.
Indigenous Peoples OP/BP 4.10	No	There are no indigenous peoples in the service area.
Involuntary Resettlement OP/BP 4.12	TBD	Project preparation will assess the known and larger sites for applicability of OP 4.12 as well as the potential applicability of OP 4.12 for the smaller sewerage pumping station rehabilitation sites. The proposed investment activities under component 2 will include rehabilitation of the existing sewerage pumping stations with no expansion or need for additional land. The land for the construction of R2 reservoir is owned by the Baghdad Water Authority. During the preparation of the site-specific ESIA/ESMPs, an assessment will determine if impact is expected on the beneficiaries which could result in a loss of income. If OP 4.12 is expected to be triggered, then an RPF will be prepared and possibly also an RAP. An RPF may need to be prepared for the project to provide resettlement and compensation guidance during implementation. If so, the RPF will be disclosed in-country and at the Infoshop prior to appraisal.
Safety of Dams OP/BP 4.37	No	This policy is not triggered.
Projects on International Waterways OP/BP 7.50	Yes	This project will require an exception to OP 7.50 notification as the implementation of the project will result in a marginal increase in water intake from the Tigris from the Al-Dora Water Treatment Plant which currently treats less than 4 percent of drinking water in the city. There will be no measurable effect on river water quality or quantity at the point of intake from the river, and there is no issue affecting the other riparians. As such, the project (i) does not adversely affect the quality and quantity of water flows to the other riparians; and (ii) is not adversely affected by the other riparians' water use. In addition, because of the rehabilitation of wastewater pumping stations, more of the wastewater generated in the city will be treated and properly disposed into the river and hence the combined effect of these investments will be positive.

Projects in Disputed Areas OP/BP 7.60	No	This policy is not triggered.

E. Safeguard Preparation Plan

Tentative target date for preparing the Appraisal Stage PID/ISDS

Mar 30, 2017

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

ESIA, ESMP, ESMF, and generic ESMP.
The studies are completed. ESIA and ESMP for R2 Water Reservoir; ESIA and ESMP for Al-Habibiya and Al-Doura Sewerage Treatment Plants; Generic ESMP for 22 Sewerage Pumping Stations; and ESIA/ESMF for Al Doura Water Treatment Plant.

CONTACT POINT

World Bank

Abdulhamid Azad
Lead Water Resource Management Specialist

Borrower/Client/Recipient

REPUBLIC OF IRAQ

Implementing Agencies

Mayoralty of Baghdad
Eng Ibrahim Hussain
Deputy Mayor
pmt.baghdadmayoralty@gmail.com

FOR MORE INFORMATION CONTACT

The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: http://www.worldbank.org/projects

APPROVAL

Task Team Leader(s):	Abdulhamid Azad

Approved By

Safeguards Advisor:	Brandon Enrique Carter	10-Feb-2017
Practice Manager/Manager:	Steven N. Schonberger	13-Feb-2017
Country Director:	Robert Bou Jaoude	19-Feb-2017