Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 02/22/2019 | Report No: ESRSC00227
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Eswatini</td>
<td>AFRICA</td>
<td>P166170</td>
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<table>
<thead>
<tr>
<th>Project Name</th>
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<td>Network Reinforcement and Access Project</td>
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<tr>
<th>Practice Area (Lead)</th>
<th>Financing Instrument</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
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<th>Borrower(s)</th>
<th>Implementing Agency(ies)</th>
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<td>Ministry of Finance</td>
<td>Eswatini Electricity Company</td>
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Proposed Development Objective(s)
To improve the reliability of electricity supply and increase access to electricity services in targeted areas of Eswatini.

Financing (in USD Million)  Amount
Total Project Cost  45.00

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

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

The proposed project supports the Government of the Kingdom of Eswatini’s goal of providing access to modern energy to all by 2022 as stated in the National Energy Policy. The project will target the Shiselweni region of Eswatini and strengthen the electricity network to improve the quality and reliability of service and increase access to electricity. The project has three components: (i) Reinforcement of expansion of the transmission and distribution network; (ii) Increasing electricity access; and (iii) Project management and technical assistance.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
The transmission line (Component 1.a) will be constructed in the southern part of eSwatini and will traverse six Tinkhundlas (administrative subdivisions): Somntongo, Sigwe, Shiselweni 1, Hosea, Zombodze and Matsanjeni. Approximately 56% of transmission line will be built within an existing right of way and 44% will be greenfield. Distribution infrastructure (Component 1.b) and new electricity connections financed as part of the ongoing Rural Electrification Program (Component 2) will also be implemented across the Shiselweni region which consists mostly of rural settlements. Small industries and commercial entities also characterise the Shiselweni region particularly within the region’s administrative town of Nhlangano. The project will also finance the construction of three (3) sub-stations to be located at Mhlosheni, Hluthi and Lavumisa and rehabilitation of one existing substation in Nhlangano town. According to the eSwatini Electricity Company (EEC) standards, the expected Right of Way (RoW) for the transmission line is 30 meters and the transmission towers will likely be installed at approximately 300 meters intervals depending on the terrain, routing and environmental and social considerations. Each tower will occupy a land footprint of approximately 22 square meters. Work under the distribution network reinforcement will largely be on brownfield sites in the 11kV network where existing equipment will be upgraded or additional equipment such as capacitor banks installed on existing infrastructure. Under the access expansion component, the extent of work will be limited to short spurs of 11kV lines and low voltage (0.4kV) lines to provide connections to the households. The project area is largely rural characterized by highveld landscape from Nhlangano to Hluti and the lowveld through to Lavumisa. A large part of the ROW for the transmission line is along land tenure categorised under Eswatini Nation Land, whilst the surrounding area is mostly for residential use and subsistence farming. Part of the ROW traverses along a banana plantation and is bordered by privately owned farms. Commercial forests with pine trees are also found along the route. Most of the land within the ROW is degraded from deteriorated surface vegetation cover due to overgrazing, making the area prone to soil erosion. The western part of the region (Nhlangano to Hluthi) is mountainous while the mid-western parts of the region (Siphambanweni to Matsenjeni) are gentle sloping areas and the eastern part, where the Lavumisa town is located, is a low lying area. Indigenous plant species such as Ficus, Aloe Malothii and grasslands with thorny bushveld trees dominate the project area. The main river along the route of the transmission line is the Ngwavuma River and a small seasonal stream called Sitilo River. Livelihoods in the region are rural based, communities are small and dispersed. Non-farm income through male migration to neighboring South Africa is important, particularly to the mines, although South Africa’s demand for migrant labor has declined over the past two decades. In this setting, where investments in infrastructure has been lower than in the other regions of eSwatini, the project is expected to impact on the ability to diversify livelihoods and bolster productive economic activities.

D. 2. Borrower’s Institutional Capacity

EEC has not implemented World Bank projects before but, through the project, will establish a Project Implementing Unit (PIU) with staff dedicated to environmental and social management. Environment: EEC has an in-house dedicated environment unit headed by an Environmental Manager and includes three (3) environment, health and safety officers who are competent in applying the eSwatini EIA laws and regulations, in carrying out ESIA and implementing ESMPs. Social: The borrower currently has two staff members who manage compensation for land acquisition and oversee stakeholder engagement using country systems. However, the Environmental and Social Framework (ESF) requirements significantly expand responsibilities, and additional staff and/or support from consultants will be needed to manage risks associated with labor influx and resettlement. In addition, EEC will engage a number of persons in the project area as stakeholder engagement officers to implement Stakeholder Engagement Plan (SEP). As potential routings for the grid reinforcement and distribution extensions are assessed, the EEC surveyors will identify the ideal route based on multiple factors, including impact avoidance and minimization informed by ESSS. The Borrower is expected to engage a firm to develop the specific documents related to social risk management. The detailed assessments will provide detailed procedures to manage risks and impacts and outline personnel requirements. Three staff members from EEC have been trained on the application of the ESF. A thorough
Institutional Capacity Assessment (using forthcoming World Bank guidance) for environmental and social management will be carried out by the Bank prior to appraisal. Any capacity gaps and strengthening measures will be described in an Institutional Capacity Strengthening Plan and reflected 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)

Environmental Risk Rating

The environmental risk classification of the Project is moderate under the World Bank’s Environmental and Social Framework (ESF) associated with risks and impacts that are site-specific, will largely occur during the construction phase of the project, and can be mitigated with measures that are known. Based on a visual survey carried out during the identification stage, key environmental impacts are related to: (i) the aesthetic and visual quality of the surrounding landscape of the project area, (ii) erosion and sedimentation of rivers from earth works and run-off during the construction phase, (iii) traffic management during the construction phase, (iv) disposal and management of waste/spoil during the construction phase, (v) occupational health and safety of workers, (vi) nuisances related to air and noise emissions from construction activities, and (vii) community health and safety. Measures to mitigate these risks and impacts will be included in the Environmental and Social Impact Assessment (ESIA), and its associated Environmental and Social Management Plan (ESMP) to be prepared by the Client and disclosed in-country and on the WB’s external web site. The relevant environmental and social instruments will be incorporated into the Environmental and Social Commitment Plan (ESCP) to be prepared and agreed with the Client as a requirement of the legal agreement that will ensure project compliance with the Environment and Social Standards and the World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines.

Social Risk Rating

The social risk classification is Substantial, associated with the expected labor influx and potential related impact of GBV and community health and safety risks, and low borrower/institutional experience. The labor influx risk is related to the construction and management of an expected two labor camps situated in a rural area, each camp anticipated to host approximately 40 workers. Most of these workers will be recruited locally. Prevalence of Gender Based Violence (GBV) in eSwatini is high: nearly 50% of all women experience some form of GBV in their life time, the majority (1 in 3) before the age of 18. eSwatini also has one of the highest adult HIV/AIDS prevalence rates globally (27.4% in 2017). On resettlement, the relative length of the transmission line and even shorter lengths of the expected distribution line extensions, along with low and dispersed population suggests a limited number of project-affected persons. It is anticipated that physical displacement shall be avoided, and that the main associated impact, including livelihood disturbance, will be temporary, and manageable. Most parts of the current country systems are at variance with the ESF and so cannot be adopted for this project. The measures to mitigate these impacts and risks will be included in the Resettlement Policy Framework (RPF), Resettlement Action Plans (RAPs), Labor Management Procedure (LMP), Environmental and Social Impact Assessment (ESIA), and its associated Environmental and Social Management Plan (ESMP) to be prepared by the Client and disclosed in-country and on the WB’s external web site. The relevant environmental and social instruments will be incorporated into the Environmental and Social Commitment Plan (ESCP) that will be prepared and agreed with the Client as a requirement of the legal agreement to
ensure that the Project complies with the Environment and Social Standards and the World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines.

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 risks and impacts are related to: (i) the aesthetic and visual quality of the surrounding landscape of the project area from the transmission lines and towers, (ii) erosion and sedimentation of rivers from earth works and run-off during the construction phase, (iii) traffic management during the construction phase, (iv) disposal and management of solid and hazardous waste from construction equipment and machinery during the construction phase, (v) occupational health and safety of workers, (vi) nuisances related to air and noise emissions from construction activities, and (vii) community health and safety. Mitigation and management of these risks and impacts will be managed under (i) ESS1 through the Environmental and Social Impact Assessment (ESIA) and associated ESMP, (ii) ESS3 on Resource Efficiency and Pollution Prevention and (iii) ESS4 on Community Health and Safety through the Health and Safety Plan and Traffic Management Plan. The main anticipated social risks are associated with labor influx, resettlement, potential impacts of GBV, community health and safety risks, and low borrower/institutional experience. The labor influx risk is related to the construction and management of an expected two labor camps situated in a rural area, each camp anticipated to host approximately 40 workers. Most of these workers will be recruited locally. Prevalence of Gender Based Violence (GBV) in eSwatini is high: nearly 50% of all women experience some form of GBV in their life time, the majority (1 in 3) before the age of 18. eSwatini also has one of the highest adult HIV/AIDS prevalence rates globally (27.4% in 2017). On resettlement, the relative length of the transmission line and even shorter lengths of the expected distribution line extensions, along with low and dispersed population suggests a limited number of project-affected persons. It is anticipated that physical displacement shall be avoided, and that the main associated impact, including livelihood disturbance, will be temporary, and manageable. Management and mitigation in relation to labor influx and associated GBV and SEA will be assessed further in the ESIA (ESS1), part of the integrated approach in the SEP and ongoing stakeholder engagement (ESS10), Community Health and Safety (ESS4) and Labor Management Procedures (ESS2). ESIA findings and the Bank’s GBV Risk Assessment Tool will guide the detection of GBV risks and the consequent development of mitigation plans. Labor Management Procedures, code of conduct and a worker specific GRM proportionate to the potential risks and impacts of the project will be established at an early stage. It is anticipated that NGOs will be engaged for awareness training of contractors, workers, communities and procurement documentation will include prioritization of local labor hiring to minimize labor influx. Resettlement impact will be avoided in early surveying of possible transmission routes and a RPF will be prepared prior to appraisal. RAPs will be prepared subsequent to finalization of routing to compensate any adverse impact (ESS5). In addition, specific attention will be paid to the identification of disadvantaged, vulnerable individuals/groups, including gender specific measures, in the project area and appropriate (and differentiated) mitigation measures will be outlined in the ESMP and RPF/RAP. Construction contractors will be required, as a condition of their contracts, to implement/comply with the ESMP, incl. preparing construction management plans consistent with specific management plans provided in the ESMP.

Areas where reliance on the Borrower’s E&S Framework may be considered:
Reliance on Borrower’s framework will not be relevant to the project.

ESS10 Stakeholder Engagement and Information Disclosure

The Borrower will prepare and implement an inclusive Stakeholder Engagement Plan proportional to the nature and scale of the project and associated risks and impacts. A key component of the stakeholder engagement plan will entail engagement of local community liaison officers (CLOs). The CLOs will engage with local stakeholders throughout the project life cycle ensuring to ensure that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context, ensuring inclusion of vulnerable and disadvantaged groups (including the elderly, persons with disabilities, female headed households and orphans and vulnerable children). The Stakeholder Engagement Plan will assist in identification of main stakeholders (project affected communities/households, rural electrification committees, CBOs, local authorities, private sector etc.). The Resettlement Policy Framework (RPF) will include enhanced requirements for stakeholder engagement with project affected people as part of preparation of the Resettlement Action Plan (RAP) which will be prepared in conjunction with surveying of possible transmission routes. The Stakeholder Engagement Plan will detail integration of project specific grievance mechanism with the existing EEC procedures (which includes an 800-toll free customer line and whistle blower protection). As part of the environmental and social assessment, the borrower will maintain, and disclose, a documented record of stakeholder engagement and Grievance Redress Mechanism (GRM), including a description of the stakeholders consulted, a summary of the feedback/grievances received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

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

It is expected that the construction of the transmission line will require the establishment of two labor camps with approximately 40 workers hosted in each. The project does not anticipate establishing a labor camps for the distribution reinforcement, extension and access related activities. Labor Management Procedures (LMP) will be prepared prior to appraisal to provide project guidelines to prevent adverse impact. A standalone worker specific GRM (for direct and contracted workers) will be established as part of the LMP. The LMP will identify primary labor requirements (how different types of workers will be managed, in accordance with the requirements of national laws) and risks associated with the project and determine resources necessary to address project labor issues. Procurement documentation will include prioritization of local labor hiring, to localize expected economic benefits and minimize the potential harm associated with influx. The exception will be skilled workers and technical experts who cannot be found in the project location. Procurement documentation will also include the requirements for a worker code of conduct, detailed requirements for management of labor influx and labor camps will be specified reflecting the LMP, including training on communicable diseases (such as HIV/AIDS) and GBV. The occupational risk related to the construction activities is associated with the risk of falling from height when stringing and installing the transmission towers. There could also be a risk of electrocution during the testing and charging phase of the anticipated project activities. EEC will develop and implement a Health, Safety and Environmental (HSE) Plan in line with World Bank Group Environment, Health and Safety (EHS) Guidelines and guidelines for Power sector. The plan
will include procedures on incident investigation and reporting, recording and reporting of non-conformance, emergency preparedness and response procedures and continuous training and awareness to workers.

**ESS3 Resource Efficiency and Pollution Prevention and Management**

Cutting of trees, stripping of topsoil and digging of foundation pits for towers will likely affect the soil structure and quality, and generate solid waste. The extent of vegetation clearance and depth of foundations will depend on the type of tower for the transmission line and pole height for the distribution lines. Given the agricultural activities that take place in the project area, if the topsoil removed during construction activities is not properly reinstated, it may lead to loss of soil quality and thereby low agricultural productivity. Noise and vibration is expected to be generated during the site preparation and construction phases. Such noise may be generated from blasting (if required), operation of construction equipment and machinery, and the transportation of equipment and materials. Depending on stringing method applied and the conductors to be used, the noise from operation of a winching machine could reach 80 dB (A). The project will also generate dust in areas where earthworks, cutting and filling operations take place or in material handling and storage areas. A large percentage of such dust emissions from construction sites are likely to comprise of particles which are coarse in size (>10 microns) which tend to settle down within a few hundred meters of the source of emissions. The smaller fractions (PM10) can however be carried over longer distances in a dust cloud, in the event wind velocity is higher and depending on prevailing wind direction maybe deposited in the adjoining settlements with the potential to cause soiling of residential premises. The project will likely generate both solid and liquid waste emanating from earthworks and construction activities in the form of spoil and hydrocarbons. The contractor will prepare a C-ESMP which will include a waste management plan and a rehabilitation plan.

**ESS4 Community Health and Safety**

Construction activities may pose potential safety concerns for the inhabitants within the vicinity of works especially when construction is carried out near a village/community. Stringing of transmission/distribution lines may cross existing roads including village and districts roads, state and national highways which could hinder movement of traffic. In some cases, temporary closure of roads may be required to facilitate stringing activities. 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. Changes in baseline environmental conditions may be experienced by the local communities in terms of increased nuisance levels from emission of dust, contamination of surface water or ground water from soil erosion and runoff, and noise from construction activities. Most labor to be locally hired, except skilled workers/technical experts who cannot be found locally, to minimize potential for harm associated with influx. A labor management procedure including code of conduct (embedding GBV requirements) will form part of procurement documentation for construction contractors and adherence to this shall form part of the contractual obligations. Contractor required to certify that all staff engaged on the project, incl. subcontractors, have completed training on safety/conduct prior to work commencement. The ESMP and other safeguard documents will fully describe the GBV risk (including a GBV Action Plan), and appropriate mitigation measures. Given high prevalence of GBV and HIV/AIDS, a qualified NGO will be engaged to train the contractor, workers, surrounding community on related risk and respectful behavior. For all construction, it will be stipulated in the ESMP that the contractor installs a security system around the project sites (fences, security guards) during the entire construction period. If construction works are carried out on land owned by EEC, the contractor will use EEC’s
existing security system. When works take place on open roads, equipment/vehicles will be brought together to one single protected area during the night to ensure community/worker safety.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The exact route of the transmission line and location of the distribution line and substations as well as access related activities will only be determined post-appraisal and RAPs will be prepared in parallel with surveying activities and associated compensation implemented prior to the commencement of civil works. The requirement for the preparation and timeframes for RAPs will be captured in the ESCP. A RPF will be developed prior to appraisal to guide implementation and initial land surveying for routing options. The RPF will provide resettlement principles, organizational arrangements and design criteria and consulted on to cover the entire project. Surveyors will be provided with training in ESS5 to prioritize avoidance and minimization of impact. It is anticipated that portions of the transmission line are likely to use existing right of way, but with possible need for expanding the right of way. Parts of the transmission and distribution lines are expected to traverse commercial land where rights of way agreements are in place (commercial forests and sugarcane production). However, it is also expected that there shall be portions where communal land and smallholder farms under traditional governance will be traversed; land used for grazing and subsistence farming. The area is rural in nature and the population density is low, with scattered settlements and homesteads. Therefore, the relative length of the transmission line and even shorter lengths of the expected distribution line extensions, along with sparsely populated area suggests a limited number of project-affected persons. It is anticipated that physical displacement shall be avoided and that the main associated impact will be temporary, and manageable.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Based on the visual survey carried out at the identification stage, some parts of the transmission line are expected to traverse commercial forest. The Borrower would need to obtain the relevant permits according to Eswatini laws and regulations, before project activities can commence through the forest land. Site preparation will involve removal of trees, shrubs and aloes that are currently present along the transmission line corridor and the site locations for the sub-stations and distribution lines which might likely cause change in the modified habitat within the project areas, leading to a loss of floral biodiversity at a localized level. Vegetation clearance may also likely cause loss of nesting habitats for bird species. The Borrower, through the environmental assessment under ESS1 will confirm any presence of threatened or endangered species according to the IUCN Classification and of the sensitivity of the project site for bird species including migratory birds. Construction activities will include excavation, movement of machinery and increased movement of people, which might also likely cause minor disturbance to the floral habitats within the vicinity of the tower footings and the project sites sub-stations because of the deposition of dust and noise generated from the construction activities. These disturbances will be for a temporary period (during the construction phase), localized and of low magnitude. During the operational phase of the project, collision with the transmission and distribution lines could also result in bird mortality. The ESMP will include measures that will mitigate the impact on birds.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
There are no identified vulnerable or marginalized groups with identities and aspirations that are distinct from mainstream groups as defined under the Indigenous Peoples/Sub-Saharan Historically Under-served Traditional Local Communities in the project area of influence. Therefore, this Standard is not relevant to the project.

ESS8 Cultural Heritage
The environmental and social assessment will confirm the existence of tangible and or intangible cultural heritage. However, all the construction contracts will include “Chance Find” clause which will require contractors to stop construction in the event that cultural property sites are encountered during construction.

ESS9 Financial Intermediaries
The standard is not relevant to the project as the project will not use financial intermediaries as an instrument for channeling funds to the beneficiaries.

B.3 Other Relevant Project Risks
The political and governance risk is substantial, given the complex decision-making process affecting eSwatini borrowing from international entities such as the World Bank Group.

Should "Other Relevant Project Risks" be disclosable? Yes

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? No

Financing Partners
N/A

B. Proposed Measures, Actions and Timing (Borrower’s commitments)
Actions to be completed prior to Bank Board Approval:
• Preparation of Environmental and Social Commitment Plan
• Preparation, consultation and disclosure of the Stakeholder Engagement Plan (SEP)
• Preparation, consultation and disclosure of the Environmental and Social Impact Assessment
(ESIA) and associated sub plans for Component 1.a
• Preparation, consultation and disclosure of the Environmental and Social Management Plan (ESMP) for Component 1.a
• Labor Management Procedures (LMP), GBV management/mitigation plan, Environmental Health and Safety Plan and a Generic ESMP for the distribution activities under Component 1.b and electricity connections under Component 2
• Institutional Capacity Assessment and Institutional Capacity Strengthening Plan
• Preparation of the Resettlement Policy Framework (RPF) for Components 1 and 2.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):
• Updating and Implementation of the Stakeholder Engagement Plan (SEP)
• Implementation of Environmental and Social Management Plans (and associated sub-plans including Health and Safety Plan, Traffic Management Plan, and Waste Management Plan)
• Development and Implementation of Institutional Capacity Strengthening Plan
• Timeframe for development and Implementation of Resettlement Action Plans (RAPs)
• Preparation of Construction Environmental and Social Management Plans
• Preparation and Implementation of Labor Management Plan
• ESMP provisions to be included in the Bidding documents and construction contracts

C. Timing
Tentative target date for preparing the Appraisal Stage ESRS 15-Mar-2019

IV. CONTACT POINTS

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<th>World Bank</th>
<th>M. Yaa Pokua Afriyie Oppong</th>
<th>Social Development Specialist</th>
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<td>Contact:</td>
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Borrower/Client/Recipient
Borrower: Ministry of Finance

Implementing Agency(ies)
Implementing Agency: Eswatini Electricity Company

V. FOR MORE INFORMATION CONTACT
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VI. APPROVAL
Task Team Leader(s): Samuel Kwesi Ewuah Oguah, Joseph Mwelwa Kapika
Safeguards Advisor ESSA Nathalie S. Munzberg (SAESSA) Cleared on 25-Feb-2019 at 09:50:13
Practice Manager Wendy E. Hughes (PMGR) Concurred on 25-Feb-2019 at 15:32:58