Report Number : ICRR0021264

1. Project Data

Country
Morocco

Practice Area(Lead)
Environment & Natural Resources

Programmatic DPL
Planned Operations: 2 **Approved Operations:** 2

Operation ID
P127956

Operation Name
MA-Inclusive Green Growth DPL

L/C/TF Number(s)
IBRD-83250

Closing Date (Original)
31-Dec-2014

Total Financing (USD)
300,000,000.00

Bank Approval Date
19-Dec-2013

Closing Date (Actual)
31-Dec-2014

	IBRD/IDA (USD)	Co-financing (USD)
Original Commitment	300,000,000.00	0.00
Revised Commitment	300,000,000.00	0.00
Actual	302,345,125.71	0.00

Prepared by
John Redwood

Reviewed by
J. W. van Holst Pellekaan

ICR Review Coordinator
Christopher David Nelson

Group
IEGSD (Unit 4)

Operation ID
P149747

Operation Name
MA- Inclusive Green Growth DPL2 (P149747)

L/C/TF Number(s)	Closing Date (Original)	Total Financing (USD)
IBRD-83250,IBRD-85730	31-Dec-2016	300,000,000.00
Bank Approval Date	**Closing Date (Actual)**	
18-Dec-2015	31-Dec-2016	

	IBRD/IDA (USD)	Co-financing (USD)
Original Commitment	300,000,000.00	0.00
Revised Commitment	300,000,000.00	0.00
Actual	300,000,000.00	0.00

2. Program Objectives and Policy Areas

a. Objectives

The objectives for the DPLs were:
1. Improving the management of natural capital.
2. Greening physical capital.
3. Strengthening and diversifying the rural economy by leveraging human capital

b. Pillars/Policy Areas

The program had three pillars -- one corresponding to each of the objectives listed above -- and six policy areas for DPL 1, which remained unchanged for DPL 2:
Pillar 1 would support the Government of Morocco's (GoM's) objective of "improving the management of natural resources underpinning key economic sectors." The objective was to be achieved through two policy areas:
Policy Area 1.1 Management of coastal and marine assets.
Policy Area 1.2 Water sector governance
Pillar 2 would support the Government's objective of "greening physical capital" through reducing adverse environmental impacts of infrastructure investments and promoting low carbon growth. The objective was to be achieved through two policy areas:
Policy Area 2.1 Low carbon growth
Policy Area 2.2 Pollution management
Pillar 3 would support the Government's objectives of "strengthening and diversifying the rural economy by leveraging human capital." The objective was to be achieved through two policy areas:

Policy Area 3.1 Green technologies in the agricultural sector
Policy Area 3.2 Diversification of rural revenues

c. Comments on Program Cost, Financing, and Dates

Program Cost and Financing: The original commitment for DPL 1 was Euro 219.7 million (US$ 300 million equivalent), but the actual disbursed amount was US$ 302.35 million equivalent). The original commitment and actual disbursement amounts for DPL 2 (US$ 300 million) were the same.
Dates: DPL 1 became effective on December 20, 2013 and DPL 2 on December 31, 2015. Both loans closed as anticipated -- DPL 1 on December 31, 2014 and DPL 2 on December 31, 2016.

3. Relevance of Objectives & Design

a. Relevance of Objectives

The program objectives were and continue to be highly relevant. They are fully consistent with Morocco's National Strategy for Sustainable Development, which was adopted by the the Government of Morocco (GoM) in June 2017, as well as with Pillar 3 ("Development of the economic model and promotion of employment and sustainable development") of the Government's Program for 2016-2021 approved in April 2017.

They were likewise relevant in terms of the Bank Group's Country Partnership Strategy for 2014-2017 (the most recent one presently available), which proposed to scale up assistance for Morocco's green growth agenda, including by supporting multi-sectoral approaches for environmentally sound and sustainable development. More specifically, it contributed to three results areas (promoting competitive and inclusive growth, building a green and resilient future, and strengthening governance and institutions for improved service delivery) and several key CPF outcomes: (i) increase the productivity and value added of the agri-food sector; (ii) better leverage the economic potential of integrated rural development and tourism; (iii) improve reliability of electricity supply; (iv) improve access to and effectiveness of social protection programs; (v) strengthen management of soil, coastal, and water resources, and (vi) increase renewable energy generation and enhance energy efficiency.

The objective was also relevant to the MENA Climate Change Action Plan that focuses on fostering water and food security, ensuring that cities are able to cope with climate change impacts, and lowering greenhouse gas (GHG) emissions by improving energy efficiency and investing in renewable energy, as well as reducing pollution from industry, transport, and waste, sequestering carbon from agriculture and investing in agro-forestry and forest preservation. This regional action plan emphasizes the promotion of and support for policies that encourage economic diversification, the shift toward low-carbon energy, improved management of natural resources, and the lifting of fossil fuel subsidies that result in wasteful energy use.

Rating
High

b. Relevance of Design

Program design was generally relevant as it was consistent with program objectives and national priorities. The likewise relevant prior conditions for DPL 1 were: (i) approval of the draft law on coastal zone management by the Council of Government; (ii) the approval of the draft law on illegal fishing by the same Council; (iii) the issuance of an Inter-Ministerial Circular by the Ministries of Interior, Agriculture, and Water requiring the conclusion of groundwater management agreements; (iv) adoption by the Council of Government of a Decree on energy efficiency in the building sector;(v) publication in the National Gazette of an order introducing automatic price adjustments for diesel, gasoline, and fuel; (vi) issuance of three orders on the monitoring and control of industrial wastewater discharges; (vii) approval of the draft framework law on environment and sustainable development, which included establishment of a comprehensive green fiscal framework; (viii) an order introducing a subsidy for the purchase of direct seeding equipment; and (ix) an order establishing the lease fee to be paid by aquaculture firms had been transmitted by the Ministry of Economy and Finance (MEF) to the General Secretariat of the Government for publication in the National Gazette.

The prior actions for DPL 2 were likewise relevant to the program objectives. These were: (i) adoption of a Decree by the Council of Government regulating the formulation of the National Coastal Zone Management Plan; (ii) issuance of a decision by the Minister of Agriculture and Marine Fisheries (MAPM) containing the National Enforcement Plan for Marine Fisheries; (iii) approval of the draft law on water setting provisions for participatory groundwater management by the Council of Government; (iv) approval by the same Council of the draft law creating the National Agency for Electricity Regulation; (v) adoption by the same Council of a Decree regarding access to the national medium voltage energy network; (vi) approval by the same Council of a draft law regarding the provision of renewable energy solutions for low voltage customers; (vii) publication in the National Gazette of the 2015 Budget Law which increased funding to social programs following energy subsidy cuts; (vii) introduction of additional resources for depollution investments in the 2015 Budget Law; (viii) signature of the framework partnership agreement by MAPM and the National Meteorology Department for the provision of agrometeorological information to the agricultural sector; (ix) validation of the Directive on environmental impact assessments (EIAs) in the aquaculture sector by the National Committee on Environmental Impact Studies and publication of a Strategic Environmental Assessment (SEA) for the aquaculture sector on its website by the National Aquaculture Development Agency; and (x) signature of an Inter-ministerial agreement launching the national rural and eco-tourism program (Qarati) by the pertinent ministries.

The policy actions to be implemented under DPLs 1 and 2 were designed to build on these prior actions and were therefore considered highly relevant, even though some of the indicators and associated targets were revised between the two loans (see the sections on Efficacy and M&E below).

The Program Document for the first DPL stated that "While Morocco is facing growing economic and fiscal challenges, its macroeconomic policy framework has remained adequate. The macroeconomic framework is expected to remain sustainable in the medium term taking into account the key fiscal and structural reforms launched recently and those announced by the authorities in the context of the draft 2014 Budget Law under discussion in Parliament" (paragraph 20). The Program Document for the second DPL concluded that "progress towards fiscal consolidation and improvement in external indicators underscore that the Government's macroeconomic policy framework remains adequate". The Document noted the "high energy dependency (94 percent in 2014), a surge in oil prices triggered by geopolitics tensions would constitute a vulnerability risk to the economy for its impact on the external position and terms of trade. Energy related measures supported by the DPL series contribute to mitigate this risk by encouraging domestic Photovoltaics (PV) production and reducing import dependency" (paragraph 26).

Based on the relevance of the prior conditions to the DPL objectives, the adequacy of the macroeconomic framework, and the contribution of the DPLs to supporting the macroeconomic framework the relevance of the design of this series of DPLs is rated high

Rating
High

4. Achievement of Objectives (Efficacy)

Objective 1

Objective
Improving the management of natural resources

Rationale
Policy actions:
1. **Number of regional coastal zone management plans approved** -- 0 at time of closing (0% of target). According to the ICR (pg. xi) the plans were expected to be achieved but no firm date was provided in the ICR. There was no change in the wording of or target for this indicator for DPL 2 in relation to DPL 1. The delay in achieving this action was due to the unsuccessful first tender for this activity which was launched at the end of 2016, and had to be relaunched in January 2018.
2. **Number of regional maritime fisheries control plans approved.** 18 (100% of target). The wording of this indicator was modified for DLP 2 from the DPL 1 version ("number of regional maritime fisheries control and enforcement plans approved") for reasons of "clarification" although the target remained unchanged (ICR, page xi).
3. **Number of aquifers (*nappes*) in which groundwater abstraction is regulated by a groundwater agreement among water consumers.** 4 (against a target of 3). The wording of this indicator was also

modified for DPL 2 from "number of aquifers (*nappes*) in which groundwater abstraction is regulated by an aquifer agreement among 'large' water consumers" also reportedly for reasons of "clarification" (ICR, page xii)

Rating
Substantial

Objective 2
Objective
Greening physical capital

Rationale
Policy Actions

1. **Area (in m2) of new buildings integrating energy efficiency requirements and respecting thermal regulations for new buildings.** The target for this revised indicator (400,000m2) was greatly surpassed (3,403,165 m2). This indicator and target for DPL 2 was significantly modified "down" (according to the ICR) from that for DPL1: "50% of new buildings (hospitals, residential, tertiary) built after the publication of the Decree and integrating EE requirements." The reason for this change (ICR, pg. xii) was recognition that "the integration of energy efficiency requirements depends on a substantial behavior change process." Thus, the target for DPL 1 was not met although the reduced target for DPL 2 was substantially exceeded.
2. **Total capacity of distributed medium- and low-tension grid-connected renewable energy systems in MW**. The wording of this indicator was modified from the DPL 1 version with "renewable energy" replacing "photovoltaic" and the target was increased from 2 MW to 10 MW reportedly due to the "widening of scope of the applicable legislation from photovoltaic energy to all types of renewable energy" (ICR, page xii). However, neither target was achieved because implementing legislation to open electricity production to renewable energy at low and medium voltage had not been approved by the Government of Morocco at the time the ICR was issued.
3. **Total subsidy envelope to diesel, gasoline, and industrial fuel (in % of GDP) reduced to 0**. The target for this indicator was reduced downward from <2.5% for DPL 1 to 0 for DPL 2. and was achieved as subsidies to diesel, gasoline, and industrial fuel were removed completely by December 2015 and this was maintained in the fiscal budgets for 2016, 2017, and 2018 (ICR, page xiii).
4. **Social Cohesion Funds allocation as a share of the total budget (excluding debt service).** This indicator was added for DPL 2 to capture the increased share of Social Cohesion Funds (FCS) expenditure within the Government budget due to savings from the removal of subsidies -- the target set for September 2017 (1.34%) was exceeded (1.63%) by December 2016 as the budget allocated to FCS doubled from MAD 2 million in 2014 to MAD 4 million in 2016 (ICR, page xiii).
5. **Number of industries having submitted a funding request to the Voluntary Mechanism for Industrial Depollution.** This indicator and its target (3) remained unchanged from DPL 1 to DPL 2 and was

greatly exceeded as 24 small and medium industries submitted requests for financing from this mechanism by September 2017 (ICR, page xiii).
6. **Reduced industrial pollution as measured by tons of BOD (Biological Oxygen Demand) abated yearly.** The target for this indicator (200 tons) was also substantially exceeded (469 tons) by September 2017 (ICR, page .
7. **Number of polluting products subject to green taxes or to conventions promoting recycling value chains**. The wording of this indicator was revised from that included in DPL 1 which read "number of products subject to green taxes" in order to clarify that the target referred to polluting products and to include conventions promoting recycling value chains. The target (4), however, remained the same and was exceeded by 100% (8) by September 2017 as the number of polluting products that are subject to environmental taxes or to partnership agreements for the organization of recycling processes are plastics, sand, used batteries, used lubricating oils, used tires, paperboard, used food oils, and plastic bags. According to the ICR (pg. xiv), feasibility studies were also underway to extend the mechanism to electronic waste, construction and demolition waste, and vehicles at the end of their lifespan.

Rating
Substantial

Objective 3
Objective
Strengthening and diversifying the rural economy by leveraging natural capital

Rationale
1. **Share of the envelope allocated to direct seeders in the total Agricultural Development Fund's (FDA) envelope allocated to seeders (traditional and direct).** The target for this indicator was reduced substantially from DPL 1 (16.9%) for DPL 2 (6%), but was only partially achieved (2%). This indicator was intended to measure the diffusion of new, resilience building conservation agriculture technologies (direct seeders) that was expected to strengthen the rural economy by the increase or maintenance of yields, reduction of energy use and costs, and provision of more money to farmers. The target was reduced due to the slower uptake of direct seeders than initially expected. The ICR (pg. xv) attributes this to a concurrent GEF grant that provided direct seeders and to a lower rate of "technology proliferation" than originally expected.
2. **Share of DMN revenues from agro-meteorological services**. The target for this indicator was also reduced substantially for DPL 2 (9%) from that set for DPL 1 (15%) and was likewise only partly achieved (5.5%) by September 2017. According to the ICR (pg. xv), the target was revised downward for DPL 2 because the DMN signed an agreement with the Ministry of Water for flood protection thereby increasing the total revenue and decreasing the share of the Ministry of Agriculture and Fisheries (MAPM) accordingly.
3. **Number of aquaculture jobs created (gender disaggregated).** The overall target for this indicator were increased from those established for DPL 1 (460) to 500 for DPL 2 and a target for women (100) was added

for the latter. These targets were partly achieved -- 367 total jobs but only 26 were for women by September 2017 (ICR, page xv).
4. **Number of ecotourism sector jobs created.** The target for this indicator for DPL 2 (250, of which 80 were for women) was likewise substantially reduced from that for DPL 1 (1,100, which was not gender disaggregated) -- however according to the ICR no jobs had been created by September 2017 because the required enabling environment had not yet been fully put in place and due to lack of financing (page xvi)

Rating
Modest

5. Outcome

Relevance of objectives and design is rated High, while outcomes with respect to two of the program's three objectives are rated Substantial and that of the third one is rated Modest due to shortfalls in relation to the outcome targets for Pillar 3 for DPL 2 even though these had already been reduced downward in the design of the policy matrix for the second loan in comparison with the original targets established for the series in the design of DPL 1. Thus, the overall rating for this programmatic series is Moderately Satisfactory.

a. Outcome Rating
Moderately Satisfactory

6. Rationale for Risk to Development Outcome Rating

The ICR (para 110, pg. 28) argues that the Government "is demonstrating a strong ongoing commitment and country ownership to the inclusive green growth objectives." On this basis, most of the policy actions that were achieved do appear likely to be sustainable. The main exceptions are those actions which were only partially implemented or whose targets were only partly met. This would be the case, for example, for the regional coastal zone management plans and the actions covered under Pillar 3. In a subsequent meeting with the ICR and program Bank task team leaders (TTLs), IEG was informed that this process continues to move forward as the national coastal zone management plan was now at the approval stage by the inter-ministerial committee that was responsible for overseeing its preparation and that, once this step is completed, the Government, which remained committed to doing so, would proceed with processing the regional plans.

a. Risk to Development Outcome Rating

Modest

7. Assessment of Bank Performance

a. Quality-at-Entry

The original targets for the indicators for the third pillar of the program were clearly far too ambitious and this continued to be the case even after they were revised downward for DPL 2. The wording of several other policy actions also needed to be modified for purposes of "clarification" for DPL 2 and in the case of the indicator regarding energy efficiency in buildings totally modified in a way which also represented a reduction in the original level of ambition.

Quality-at-Entry Rating

Moderately Satisfactory

b. Quality of supervision

As a two-loan programmatic DPL, the Bank had a chance to revise the policy action-related indicators and their associated targets between the two operations, and, in fact, did so in some cases to a significant extent. However, especially in the case of Pillar 3 (Strengthening and diversifying the rural economy by leveraging human capacity), the downward adjustments still proved to be too optimistic.

Quality of Supervision Rating

Moderately Satisfactory

Overall Bank Performance Rating

Moderately Satisfactory

8. Assessment of Borrower Performance

a. Government Performance

Government commitment and performance were generally adequate although some policy actions, particularly for Pillars 1 and 3, could not be completed within the time frame of the two DPLs. This was the case, for example, with regard to the enabling environment for the regional coastal zone management plans and also affected the lower than expected outcomes with the various policy areas in Pillar 3 and particularly that related to new employment in ecotourism activities, which were intended to help diversify rural employment.

Government Performance Rating

Moderately Satisfactory

b. Implementing Agency Performance

Implementing agency performance was not specifically assessed in the ICR, which stated that these agencies were the Ministry of General Affairs and Governance (MAGG), the Ministry of Economy and Finance (MEF),and the Ministry of Energy, Mines, and Sustainable Development (MEMDD) were "indistinguishable" from the Government and thus were not assessed individually. It concluded that these agencies showed "dedication and vital contributions towards the achievement of the outcomes," but "in light of the shortcomings in policy implementation and outcome achievement, as well as remaining pending actions," their performance was rated Moderately Satisfactory. IEG has no basis for disagreeing with this evaluation.

Implementing Agency Performance Rating

Moderately Satisfactory

Overall Borrower Performance Rating

Moderately Satisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design

M&E design was generally good, although the wording of some of the results indicators needed to be revised for DPL 2 either for clarification purposes or in one case (in relation to energy efficiency in buildings under Pillar 2) because it was too ambitious and not easy to monitor. However, some of the program indicator targets established for DPL 1, particularly for Pillar 3, proved to be overly ambitious and had to be revised downward for DPL 2. This was the case with the targets for: (i) the share of the envelope allocated to direct seeders in the total FDA (Agricultural Development Fund) envelope allocated to seeders, which was reduced from 16.9% for DPL 1 to 6% for DPL 2; (ii) the share of DMN (Directorate for National Meteorology) revenues from agro-meteorological services, which was reduced from 15% for DPL 1 to 9% for DPL 2; and (iii) the number of ecotourism jobs created including for women, which were reduced from 500 and 100, respectively, for DPL 1 to 250 and 80 for DPL 2. In one case, on the other hand -- the number of acquaculture jobs created the target was increased slightly from 460 for DPL 1 to 500 for DPL 2 and a target for women (80) was added for DPL 2. One of the targets under Pillar 2 was also reduced from 50% of all new buildings (hospitals, residential, tertiary) that integrate energy efficiency requirements for DPL 1 was changed to 400,000 m2 of new buildings integrating such requirements for DPL 2 based on the estimated pipeline of new buildings until 2017. According to the ICR (Table 1, pg. 5), this revision was necessary due to the recognition that "the integration of energy efficiency requirements depends on a substantial behavior change process." However, several other targets under this pillar were increased and an entirely new indicator -- Social Cohesion Funds allocation as a share of the total budget (including debt service) -- was introduced under the same pillar for DPL 2. All of these changes reportedly reflected lessons learned from the implementation performance of DPL 1

b. M&E Implementation

M&E implementation was likewise adequate and performance in relation to the indicators and associated targets established for DPL 1 was the basis for the modifications made in the monitoring and evaluation framework for DPL 2.

c. M&E Utilization

The M&E data were used, as noted above, to inform the changes -- in most cases lowering targets for some indicators -- introduced for DPL 2 and the results were also used for the evaluation of program performance in relation to the various policy actions in all three pillars/objectives in the ICR.

M&E Quality Rating

Substantial

10. Other Issues

a. Environmental and Social Effects

The DPLs were focused on a range of environmental and social issues and thus were positive in this regard. According to the ICR, they also contributed to poverty and social development aspects through: (i) enhanced management of natural resources that influenced job creation and resource sustainability; (ii) enhanced stakeholder participation in natural resource management; and (iii) widening the beneficiary base of the FCS programs by contributing to the doubling of its budget through the elimination of energy and fuel subsidies. Promoting greater energy efficiency in buildings was also a positive contribution as the result of the associated reduction in energy generation and associated GHG emissions although this benefit was not specifically quantified by the ICR. More generally, the ICR (para. 108, pg. 27) credits the DPLs with supporting the Government in "shifting its growth path towards green growth in a transformational manner."

b. Fiduciary Compliance

NA

c. Unintended impacts (Positive or Negative)

The unintended positive impact of the DPL series which was highlighted in the DPL (para 108, pg. 28) was the increased allocation of budgetary resources to the Social Cohesion Fund (FCS) program, which was made possible as a result of fiscal savings due to the reduction of energy subsidies.

d. Other

Poverty and Social Development. The DPL series contributed to: (i) enhanced management of natural resources such as fisheries, aquaculture, and groundwater conservation that influence job creation and sustainable livelihoods; (ii) enhanced stakeholder participation in natural resource management; and (iii) expanded the beneficiary base of the FCS programs.
Institutional Development. The series helped to strengthen the capacity of: (i) the Ministry of Energy, Mines, and Sustainable Development (MEMDD) to address the environmental and social impacts of aquaculture and for preparation of the national coastal zone management plans; (ii) Fisheries Departments at the national and local levels to prepare and implement fisheries control plans; (iii) DNM to sign contracts for provision of meteorological services; and (iv) River Basin Agencies to undertake consultations and prepare bottom-up framework contracts for groundwater management.

11. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Moderately Satisfactory	Moderately Satisfactory	---
Risk to Development Outcome	Modest	Modest	---
Bank Performance	Moderately Satisfactory	Moderately Satisfactory	---
Borrower Performance	Moderately Satisfactory	Moderately Satisfactory	---
Quality of ICR		Substantial	---

Note

When insufficient information is provided by the Bank for IEG to arrive at a clear rating, IEG will downgrade the relevant ratings as warranted beginning July 1, 2006.
The "Reason for Disagreement/Comments" column could cross-reference other sections of the ICR Review, as appropriate.

12. Lessons

Several lessons highlighted in the ICR are important and are consistent with those in IEG's own recent assessment of environmental DPLs:
1. **Government ownership at all levels is essential to ensure effective implementation of policy reforms for green growth**. As the ICR (para. 122, pg. 30) stated, "this is demonstrated by the DPL that included the concerted effort of several agencies including the MEF, MAGG, MAPM, MEMDD (Ministry of Energy, Mines, and Sustainable Development) as well as national agencies, such as the Moroccan Agency for Tourism Development; National Aquaculture Development Agency (ANDA), and Oum Er Rbia River Basin Agency (ABHOER)."

2. **In-depth knowledge of the country and sectors is a key factor for ensuring adequate design of an operation and its successful implementation**. The ICR (para. 124, pg. 30) adds in this regard that "the ongoing dialogue that the World Bank already had in Morocco, coupled with the extensive upstream and sectoral analytical work have contributed towards adequate design in terms of the selection of prior actions; outcome indicators and targets....; and for issues that need attention from high-level decision makers, especially in finance and planning ministries."
3. **Supporting the DPL with Advisory Services and Analytics (ASA) and investment project financing contributes to successful implementation of policy and sectoral reforms and achievement of outcomes**. The ICR (para. 125, pp. 30-31) observes, more specifically, that "this DPL series has been well supported directly and indirectly...through ASA and investments, including grants, for example, a Multi-donor Trust Fund (MDTF) grant for ASA and support dialogue; MDTF support to the ABHOER; GEF grant for integrated coastal zone management (ICZM); Partnership for Market Readiness (PMR) ASA on energy efficiency in buildings; and a grant from the EU Climate Change MDTF to support technical assistance activities on agro-meteorology, green taxes, groundwater governance component, and ICZM."
To these can be added:
4. **Effective DPLs involving actions in various sectors require a strong coordinating mechanism as well as adequate ownership of the policy reforms and actions by the participating sector institutions**. This too was an important lesson drawn from IEG's recent review of environmental DPLs which clearly applies to this programmatic series as well.

13. Assessment Recommended?

No

14. Comments on Quality of ICR

The ICR is well-written, comprehensive, and of good quality. Its Annex. 7 comparing prior actions and triggers for DPL 2 at the time of approval of DPL 1 and as revised, indicating the analytical underpinnings of each of the pillars, and the DPLs' contributions to the Bank Group's Country Partnership Strategy for Morocco for 2014-2017 was also very informative and useful. Its only shortcoming is that is tends to claim prior actions as part of the achievements of the DPLs, which are preconditions, and thus somewhat overstates actual accomplishments resulting from the loans themselves. In a subsequent meeting with the program and ICR TTLs, it was clarified that, indeed, the Bank appears to have contributed directly and significantly to the achievement of some -- but not all -- of the prior actions for DPLs 1 and 2, but it was also recognized that this was not the outcome of these two loans per se.

a. Quality of ICR Rating

Substantial