



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 06/12/2019 | Report No: ESRSA00190



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Argentina	LATIN AMERICA AND CARIBBEAN	P170329	
Project Name	Improving the Electricity Social Tariff Transition in the Buenos Aires Province		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Jobs	Investment Project Financing	7/4/2019	8/30/2019
Borrower(s)	Implementing Agency(ies)		

Proposed Development Objective(s)

The development objective is to support the transition of the electricity ST strengthening the institutional capacity in the PBA

Financing (in USD Million)	Amount
Total Project Cost	150.00

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

No

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

Country Context. The current macroeconomic context in Argentina is characterized by marked financial volatility emerging from a combination of domestic and external factors. Economic activity suffered a 2.5% contraction in 2018 triggered by the impact of the financial turmoil and the strong drought. Inflation increased, driven by a sharp adjustment in the exchange rate, reaching 47.7 percent in 2018, the highest since 1991. In June 2018 the IMF approved a Stand-by Agreement (SBA) for US\$50 billion. After a relatively calm period following the first SBA with the IMF, Argentine assets came under renewed pressure in the second half of August 2018. In this context, in October 2018 the Government revised the SBA by putting in place modifications both in the fiscal and monetary program,



through which the Government accelerated the fiscal consolidation. Under this process, subsidies have been more than halved—representing a substantial fiscal reform, and the Fiscal Pact with provinces in 2017 aimed at rebalancing the distribution of revenues. An addendum to the Fiscal Pact signed at the end of 2018 (Law No. 27469), transferred several responsibilities to the provinces, including the regulatory authority and the financing of social tariffs for residential electricity, starting in 2019. Around one-third beneficiaries of electricity ST (1.4 million users) resides in the PBA.

Sectoral and Institutional Context. Since 2002, the government has used a wide range of subsidies to protect households from rising inflation and to support specific sectors of the economy. Energy subsidies have played a critical role in protecting poor households from rising inflation in Argentina, but their cost has increased rapidly since their introduction. The fast growth of energy subsidies (together with other subsidies) has been a key driver behind the growth of public expenditures and constituted a large share of federal government spending by 2016. Many of Argentina’s electricity and gas subsidies have benefitted middle- and upper-income households as well as non-residential consumers. In this context, the current administration made reforming energy subsidies a priority to reduce fiscal costs while protecting the most vulnerable, as well as to lessen the detrimental effects of the subsidies on the sustainability and efficiency of the energy sector.

Following the energy emergency declared by Decree No. 134 in December 2015, upstream subsidies to the electricity sector declined and in February 2016 the federal government implemented the electricity ST to residential users. The electricity ST scheme is estimated to be mildly pro-poor by design, with over half of the beneficiaries belonging to the bottom 40 and less than 2 percent from the richest decile.

Eligibility criteria for the ST were defined by the Ministry of Energy, with inputs from the National Council of Social Policies (CNCPS). The inclusion criteria contemplate users who were retirees, pensioners, beneficiaries of non-contributory pensions, salaried or self-employed workers with income below two minimum wages, beneficiaries of social programs, low productivity self-employed workers registered under the “monotributo social” scheme, war veterans, domestic workers, beneficiaries of unemployment insurance, persons with disabilities and electricity-dependent persons. Users who have more than one property, a car newer than ten years, a plane or a luxury boat are excluded. Vulnerable populations living in slums part of the Conurbano (in Greater Buenos Aires) usually covered freely through community meters under a separate scheme, Convenio Marco, governed by agreements between the regulatory agency and electricity providers.

The eligibility criteria mentioned above have some weaknesses. First, the criteria for inclusion and exclusion result in the incorporation of some non-vulnerable households and the exclusion of some vulnerable ones. Second, the criteria are formulated on an individual -instead of a household basis, and therefore are not able to identify the vulnerability conditions accurately. There are also challenges to applying the eligibility criteria effectively. The administrative records needed for verifying conditions are dispersed among different governmental agencies and government levels, making access and updates a difficult process.

Starting in January 2019, the regulatory and fiscal responsibilities in the energy sector were transferred from the Federal Government to Provinces. This has resulted in the Provinces both having to commit additional resources for the payment of social electricity tariffs and requiring additional resources for regulation of the electricity sector. Provinces have assumed this delegation through provincial laws accepting Consenso Fiscal and including the attached fiscal commitments in their own budgets 2019. PBA committed to maintaining the federal electricity ST scheme.



In the current transition phase, ST management is fragmented among federal and subnational institutions. Indeed, electricity regulatory competencies have not been fully formalized. In addition, the electricity ST handover from the federal to the provincial government does not include data management capabilities or specific arrangements for the transition, at least formally.

This Project will support the Province of Buenos Aires' authorities with the implementation and financing of the social tariff for electricity. The project will support in the short term the transition of the ST from the federal to the provincial government by strengthening the capacity of the PBA government to administer the ST, and to improve identification and monitoring of its beneficiaries. In the medium term, the developed institutional capacities will help the PBA to address major ST reforms. The proposed lending instrument is a three-year investment project financing loan (IPF) that would finance the ST under a disbursement link indicators (DLIs) component, and that would include a technical assistance component that would disburse under regular procurement methods.

The proposed Project is aligned with the Country Partner Framework (CPF) and the Argentina Systematic Country Diagnostic (SCD), whose analyses identify constraints to inclusive and sustainable growth and poverty reduction and recommendations to address them. By supporting poor and vulnerable populations, the planned ST operation with the Province of Buenos Aires is related to the first CPF focus area, supporting Argentina in securing access to long-term private financing on a sustainable basis, while aimed at conducting the fiscal consolidation reforms in a manner which increases equity and efficiency and protects the poor and low-income population from the adverse impacts of policy measures. This Project will focus on the latter aspect supporting the protection of the vulnerable through the electricity ST as subsidies are reduced.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The development objective of the Project is to support the transition of the electricity social tariff's administration from the federal to the provincial level. The Project aims to strengthen management and monitoring for electricity social tariff (ST) by establishing a roadmap with key institutional and technical milestones in the short-run which reinforce PBA capacities to assess and address major ST reforms in the mid-term. The Project will neither finance nor support any physical intervention. The main social impacts associated with the Project are positive.

The Project will be implemented in the Province of Buenos Aires (PBA) and will include (i) a component to finance social tariff subsidies through a scheme of disbursement link indicators (DLIs), where all the disbursements are linked to institutional strengthening activities (e.g. the creation of a bipartite agency for ST management in AMBA, reduction of the number of users with missing identification data, policy options for targeting criteria, among others); and (ii) a technical assistance (TA) component, which will finance capacity building activities and sectoral studies for the improvement of the ST scheme. Through the technical assistance component, the Project aims at founding the basis to revert the two main issues of the current ST scheme; namely, (a) that the eligibility criteria of the ST do not focus efficiently on the most vulnerable families by design, and (b) that the implementation arrangements face challenges to apply the eligibility criteria effectively.



Eligibility criteria for the ST were defined by the Ministry of Energy, with inputs from the National Council of Social Policies (CNCPS). The inclusion criteria included users who were retirees, pensioners, beneficiaries of non-contributory pensions, salaried or self-employed workers with income below two minimum wages, beneficiaries of social programs, low productivity self-employed workers registered under the “monotributo social” scheme (simplified income tax regime, for small independents workers with very low income), war veterans, domestic workers, beneficiaries of unemployment insurance, and persons with disabilities. Users who had more than one property, one car newer than ten years, a plane or a luxury boat are excluded. Based on eligibility criteria, the beneficiaries are identified by the Fiscal and Social National Identification System (Sistema de Identificación Nacional Tributario y Social, SINTyS). Vulnerable populations living in slums are usually covered freely through community meters under a separate scheme, Convenio Marco, governed by agreements between regulatory agencies and electricity providers.

As stated above, the eligibility criteria have weaknesses. First, the criteria for inclusion and exclusion result in the incorporation of some non-vulnerable households and the exclusion of some vulnerable ones. They include some groups such as formal workers and pensioners earning close to two minimum wages that are not among the most vulnerable, and also criteria do not include low-income users who are informal workers or unemployed not entitled to social programs. Second, the criteria are formulated on an individual -instead of a household basis and therefore are not able to identify the vulnerability conditions accurately. As the identification mechanism (listing of service holders) does not incorporate information about all individuals residing at the same address, the eligibility conditions are verified only for the formal service holder (who is named on the bill). This information constraint translates into exclusion errors when the household member who qualifies for ST is not the holder of the service; and into inclusion errors when other family members would be ineligible under the established criteria.

There are also challenges in applying the eligibility criteria effectively. The administrative records needed for verifying conditions are dispersed among different governmental agencies and government levels, making access and updates a difficult process. Therefore, when SINTyS is not able to gather these data sources in a timely and complete manner, there are difficulties in screening users and determining their eligibility for ST. This is the case of tax information and property registries in charge of Provinces. In addition, holders of electricity bills might not be the users. This could be due to owners' records not being updated, a recent change in the property ownership, or residents not owning their homes (i.e., they are tenants). Finally, the last stage of the ST process lacks institutional governance to assure that only verified eligible users receive the benefit. There is no feedback between the information that service provider companies receive from ENRE on users once the ST is applied.

The electricity ST scheme is mildly pro-poor by design, with half of the beneficiaries belonging to the bottom 40 and only 2 percent to the richest decile. Among these, over half are estimated to qualify to the ST through social programs (mostly, Universal Child Allowance - AUH), while the remaining beneficiaries within the bottom 40 receive ST due to low earnings or pensions, in equal proportions. In terms of amount, it is estimated that around 47 percent of the ST are accrued by the poorest two quintiles. The average ST reaches around 43 percent of the electricity bill, with a higher proportion for the worse-off households. This reduction in the bill represents around 4 percent of the incomes for those families in the poorest deciles, while only 0.4 percent for those in the richest decile. Women represent 70 percent of ST users in PBA. Main inclusion categories for ST are retirees and CCT beneficiaries, who both concentrate 72.4 percent of ST users. Women represent 68 percent and 83 percent of ST users in those categories, respectively.



Continued support (through the Social Tariff) to vulnerable populations, in risk of extreme weather events enhanced by climate change, in coordination with a whole set of comprehensive policies, is key to continue supporting these populations and allow for the reduction of climate risks and increased adaptation.

D. 2. Borrower’s Institutional Capacity

The PBA has some capacity to manage the ST scheme and represents a strong case for improving the effective coverage of electricity ST. The transition positions PBA as a leading case for other Provinces: ST beneficiaries in the PBA reach 1.4 million electricity users, with the total subsidy amount representing 0.12 percent of GPP. The PBA has adequately trained and qualified staff at the Provincial Directorate of Subsidies and OCEBA.

The PBA is signing data sharing agreements with national entities while the final institutional arrangements are still being designed. Thus, in the upcoming challenge related to implementation, the PBA engages in improving the identification strategy of eligible customers, laying stepping stones to further design upgrades. Advancements made by the PBA could turn into examples for other provinces to emulate.

A Project Management Unit (PMU) will hold the fiduciary and environmental & social risk management responsibilities of the Project. This PMU will reside in the Provincial Directorate of Multilateral and Bilateral Financing (Dirección Provincial de Organismos Multilaterales y Financiamiento Bilateral, DPOMyFB), of the Ministry of Economy of the Province of Buenos Aires. For this Operation, the PMU will have one professional focused on the management of the environmental and social aspects of the Project, in addition to the support of other institutional teams like the Provincial Indigenous Peoples Affairs Council. The DPOMyFB has experience working with World Bank Safeguards and it's socio-environmental staff have been trained in the ESF.

The Directorate of Subsidies (also under the Ministry of Economy of the Province of Buenos Aires) and two regulatory agencies (the Provincial regulatory agency -OCEBA- and the national electricity regulatory agency - ENRE-) will be responsible for Monitoring and Evaluation and for conducting the necessary studies to design an integrated proposal regarding Social Tariffs.

The electricity distribution in the Buenos Aires Metropolitan Area used to be regulated under ENRE, but since January 2019 is under the orbit of the regulatory authorities of the Buenos Aires Province and in the Autonomous City of Buenos Aires (CABA). PBA and CABA have signed an agreement to create an agency to replace ENRE regulatory competencies for distribution companies in AMBA. Thus, a new bi-partite regulatory agency will replace ENRE, integrated by the subnational regulatory agency (Organismo de Control de la Energía Eléctrica de la Provincia de Buenos Aires -OCEBA) and CABA who will share regulatory responsibility. Until the new agency is in place, ENRE will continue acting as the distribution regulator.

Public Disclosure

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) Moderate

Environmental Risk Rating Low

This operation does not entail risks to the environment. The proposed Project will neither finance nor support any physical intervention. No rehabilitation or construction of new infrastructure or other actions having an impact on the environment will be financed through the Project. In this sense, the overall risks to and potential adverse impacts on



the environment are likely to be minimal or negligible. Furthermore, the Project would entail valuable outcomes and recommendations for decision making related to the improvement in consumption behaviors in social tariff (ST) beneficiaries' households (energy efficiency).

Social Risk Rating

Moderate

The main environmental and social impacts associated with the Project are positive. The ST promotes efficient use of energy together with economic savings for those that receive the benefit.

Although the scheme has eligibility criteria and requirements, there are weaknesses in the current ST system (inclusion/exclusion errors), which could be affecting users in greater need and, in addition, leaving space for more efficient use of the resources. Therefore, the main social risks are associated with the potential exclusion of vulnerable people who qualify and are in most need of having access to the ST.

Each of the regulatory agencies (ENRE and OCEBA) has an own formal Grievance Mechanism (GM) in place for users to complain if they haven't been included or if they have been taken out of the ST roster. Under these GMs, regulatory agencies exchange the consolidated information with SINTyS to apply the eligibility criteria, check the consumption to apply the proportional discounts, and evaluate complaints and ST requests of users that were not automatically selected. Currently, 18.3 percent of the ST beneficiaries (more than 250,000 cases) access the ST benefit via complaints and other ad hoc additional assessments. This number indicates that the Project's GMs are satisfactorily attending the grievances, complaints, questions, and suggestions it is receiving through different channels. Nevertheless, the performance of the GM will be monitored and assessed by Project Management Unit (PMU) under the Provincial Directorate of Multilateral and Bilateral Financing (PDMBF). on a systematic basis to strengthening and improving the mechanisms as necessary.

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:

This standard is relevant. As the financing of the subsidies component involves the disbursement of funds through a scheme of DLIs and none of the DLIs are associated to physical interventions, no environmental risk or adverse impacts will be associated with these activities. The social tariff was introduced to mitigate the impact of subsidy reform. Although the scheme has eligibility criteria and requirements, there are weaknesses in the current ST system (inclusion/exclusion errors), which could be affecting users in greater need and, in addition, leaving space for the more efficient use of the resources.

The Project will support the ST for electricity in the Buenos Aires province of Argentina, by improving the effectiveness of its general design and implementation. In particular, this Project will strengthen the institutional capacity to apply targeting and monitoring mechanisms aimed at providing protection to vulnerable households and small community sports clubs (SCSC) in a fiscally sustainable way.

Specifically, the TA component of the Project will aim at: a) developing the institutional scheme to manage the ST and establishing the necessary regulations, in line with the transfer of responsibilities from the federal to the provincial



administration; b) strengthening the management of information and the targeting mechanisms to reach poor households; c) supporting institutional and management setting to assess eligibility of SCSC and; d) carrying out sectorial studies to improve, inter alia, consumption behavior (energy efficiency) in ST beneficiary households and institutional capacities at provincial regulatory agencies and at electricity distribution providers level.

These activities involve many challenges, such as inter-institutional coordination (relevant federal, provincial and municipal agencies); participation of private companies and private or municipal cooperatives of electricity distribution; key stakeholders' identification and involvement in the context of the sensibility of the subject and the management of expectations.

The DPOMyFB prepared an Environmental and Social Assessment (ESA) which advanced draft will be publicly disclosed on the Borrower's and the Banks's external site on June 14, 2019. The ESA includes a description of the current scheme and institutional arrangements and identifies the most vulnerable groups. The document also analyzes the main risks associated with exclusion/inclusion issues mentioned above and identifies key mitigation measures including the activities to be supported by the TA in addition to a robust stakeholders engagement process to maximizing project benefits by making sure the ST scheme leaves no one behind among the most vulnerable. The ESSA includes an annex with an Indigenous Plan as an annex with specific actionable measures to promote the inclusion of Indigenous Peoples. These actions are also included in the Project's Stakeholder Engagement Plan (SEP) and specific timing for their implementation is described in the Project's Draft Environmental and Social Commitment Plan (ESCP) that will be finalized during Negotiations.

ESS10 Stakeholder Engagement and Information Disclosure

This standard is relevant. As per the electricity tariff legal framework, consultation with the public is mandatory when there have been changes or updates in tariff schemes. Thus, regulatory agencies involved in the Project have experience in carrying out information disclosure and stakeholder exchange. The original ST scheme and eligibility criteria were created in consultation the National Council of Social Policies (CNCPS).

As stated above, the TA Component will be focused on enhancing institutional arrangements required for the implementation of the ST scheme, including: (i) the improvement of data exchange among the different public stakeholders at the federal and provincial levels (The project will support the establishment of protocols for information sharing across institutions), (ii) the assessment and enhancement of regulatory agencies' grievance mechanisms and citizen participation processes; and (iii) the enhancement and consolidation of an unified data collection system on electricity users, including a revised targeting scheme focused on vulnerable groups (including indigenous peoples, Afro-descendants, people with disabilities, LGBTI, etc.).

The DPOMyB prepared an advanced draft of the Stakeholders Engagement Plan (SEP) that will be publicly disclosed on the Borrower's and the Bank's external sites on June 14, 2019 to agree with different stakeholders on actions required to achieve the objectives described above and plan for future participatory activities. SEP includes inputs from consultations with the regulatory agencies (ENRE and OCEBA) and the Provincial Indigenous Affairs Council (CPAI). The document also includes the commitment to carry out consultation with beneficiaries at the individual level, but also through civil society organizations that represent different groups, with particular attention to those representing the vulnerable groups mentioned above. It will also include further consultations with the three



agencies that worked on the ST scheme creation (i.e. the Ministry of Energy, ENRE and SINTyS), the provincial agencies that are connected to its implementation (i.e. the Ministry of Infrastructure and Public Services, OCEBA), CAMESSA and the National Council of Social Policies. The consultation process will have additional instances during the first three months of implementation, when it will also incorporate other key actors like service provider companies (distributors) and consultations with representatives from community centers, small community social clubs, and consumer associations, etc.

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

This standard is relevant. The Project will be mainly implemented by staff from the DPOMyFB, the Provincial Directorate of Subsidies and the OCEBA (Government Civil Servants). It will also be implemented by some direct workers (those working full time of the Project in the PMU) consultants and other contracted workers (i.e. those providing non-consultant services).

Appropriate occupational health and safety measures related to the activities foreseen under the project (administrative-related tasks in an indoor environment) will be applied. In addition, the Project will have a consolidated Labor Grievance Mechanism available for all Project workers, with different channels to address complaints, questions, grievances, and suggestions. This GM will be ready before Project Effectiveness.

The applicable regulatory framework is consistent with ESS2 requirements; a summary of the applicable legislation is presented in the ESA. All contracts will reflect appropriate labor and working conditions as per ESS2.

ESS3 Resource Efficiency and Pollution Prevention and Management

The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS3.

ESS4 Community Health and Safety

The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS4

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS5

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS6.

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



This standard is relevant. Argentina is a multicultural country with a notable presence of indigenous and afro-descendants populations, and the majority of these populations live in urban areas.

Indigenous people (2.54 percent of the population) traditionally live in rural communities in the provinces of Salta, Jujuy, Chubut, Neuquén, Tierra del Fuego, Chaco, Formosa, Santa Fe, Tucuman, and Mendoza. However, more than 80 percent of the indigenous population in Argentina lives today in urban areas, with the largest concentration living in the Buenos Aires Metropolitan Area. This is due to numerous factors, including new and improved access to basic services as well as improved market opportunities.

The main challenge related to these groups is linked to the lack of reliable data and to unidentified drivers of exclusion. For that reason, these groups will be part of the stakeholder engagement process, and relevant recommendations that may result from their participation will inform the TA. Consultations with the CPAI have taken place as part of Project Preparation. Further dialogue with this institution and consultations with the Indigenous Council of the Province of Buenos Aires (CIBA) will be included in the SEP.

An Indigenous Plan was included in the ESA as an Annex. It will be validated with the CPAI before Appraisal and consulted with other IPs representatives during the first three months of Project implementation. These specific consultation plans are included in the SEP and both consultation and implementation of the Plan are included in the ESCP.

ESS8 Cultural Heritage

The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS8.

ESS9 Financial Intermediaries

The Project will not involve the use of Financial Intermediaries.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
Consultation of Environmental and Social Assessment with relevant stakeholders.	03/2020

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Establish an organizational structure with qualified staff to support management of E&S risks associated to the Project within the DPOMyFB. Maintain as necessary throughout Project implementation.	12/2019
Assessment of existing grievance mechanisms.	03/2020
ESS 10 Stakeholder Engagement and Information Disclosure	
Consultation and publication of the Stakeholders Engagement Plan.	03/2020
Implementation of actions included in the SEP.	12/2022
Assessment of existing grievance mechanisms.	03/2020
ESS 2 Labor and Working Conditions	
Internal communication campaign to make sure all workers related to the Project know the Labor Grievance Mechanism that is available for them.	01/2020
Implement appropriate occupational health and safety measures, including appropriate measures on emergency preparedness and response.	01/2020
ESS 3 Resource Efficiency and Pollution Prevention and Management	
N/A - The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS3.	
ESS 4 Community Health and Safety	
N/A - The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS4.	
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
N/A - The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS5.	
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
N/A - The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS5.	
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
Consultations with the Provincial Indigenous Affairs Council (CPAI) and the Indigenous Council of the Province of Buenos Aires (CIBA).	03/2020
Review indigenous action plan in ESA based on consultations and implement it.	03/2020



Assess the need to develop and implement a grievance mechanism for indigenous people.	03/2020
ESS 8 Cultural Heritage	
N/A - The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS8.	
ESS 9 Financial Intermediaries	
N/A - The Project will not involve the use of Financial Intermediaries.	

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

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

The Project will not make use of the Borrower's E&S Framework but will comply with all national legal requirements.

IV. CONTACT POINTS

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Implementing Agency(ies)

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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