



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

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Concept Stage | Date Prepared/Updated: 05-Jun-2018 | Report No: PIDISDSC23538

**BASIC INFORMATION****A. Basic Project Data**

Country Sao Tome and Principe	Project ID P161842	Parent Project ID (if any)	Project Name Sao Tome e Principe Transport Sector Development and Coastal Protection Project (P161842)
Region AFRICA	Estimated Appraisal Date Jun 25, 2018	Estimated Board Date Oct 30, 2018	Practice Area (Lead) Transport & Digital Development
Financing Instrument Investment Project Financing	Borrower(s) Ministry of Finance, Trade and Blue Economy	Implementing Agency INAE (instituto Nacional das Estradas)	

**Proposed Development Objective(s)**

The proposed PDOs is to reduce road users' cost and increase transport and urban infrastructure resilience to coastal erosion and rise of sea level

**PROJECT FINANCING DATA (US\$, Millions)****SUMMARY**

<b>Total Project Cost</b>	60.00
<b>Total Financing</b>	60.00
<b>of which IBRD/IDA</b>	25.00
<b>Financing Gap</b>	0.00

**DETAILS****World Bank Group Financing**

International Development Association (IDA)	25.00
IDA Grant	25.00

**Non-World Bank Group Financing**

Other Sources	35.00
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EC: European Investment Bank	25.00
NETHERLANDS: Min. of Foreign Affairs / Min. of Dev. Coop.	10.00

Environmental Assessment Category

B - Partial Assessment

Concept Review Decision

Track I-The review did authorize the preparation to continue

Other Decision (as needed)

## B. Introduction and Context

### Country Context

**The Democratic Republic of São Tomé and Príncipe (STP) is a small island state comprised of two main volcanic islands**, and several islets located off the west coast of central Africa in the Gulf of Guinea. São Tomé, the largest island, covers an area of 859 km<sup>2</sup> with around 180,000 inhabitants. Príncipe Island, situated 150 km to the north, covers about 142 km<sup>2</sup> with around 7,500 inhabitants. The country is divided into six districts (Água Grande, Cantagalo, Caué, Lembá, Lobata, Mé-Zóchi) plus the Autonomous Region of Príncipe (RAP), which has been self-governed since 1995.

**As a small island developing state, STP is highly vulnerable to the effects of climate change and sea level rise.** STP shares many of the challenges affecting other West African coastal countries: severe coastal erosion and shoreline loss; overexploitation of fisheries and coastal aggregates; coastal pollution; rapid urbanization and unsustainable land use; and overlapping policies affecting the governance of the coast. The negative impacts of Climate Change are evident in all sectors of the national economy including transport and coastal zone and population. Climate change adaptation and risk reduction from climate change impact is a priority for the national authorities. STP has taken steps to identify measures<sup>1</sup> to contribute to the reduction of national GHG emissions and improve resilience to climate change. However, the implementation of these measures both for adaptation and mitigation require financial resources and institutional capacity.

### Economic context

**STP is a low-middle income country.** Gross National Income per capita is estimated at US\$1,200 in PPP terms; Gross Domestic Product (GDP) per capita is US\$1,692. STP's economy is based on services and the primary sector, with an almost non-existent industrial sector. The main economic activities are tourism, retail, transport, communication, and construction. Agriculture and fishing is a mainstay for the majority of the population despite its modest contribution to GDP. São Tomé and Príncipe faces the usual hardships associated with small island states with no natural resources.

<sup>1</sup> The World Bank group has initiated its support to the government of STP on its adaptation agenda with assistance to the preparation of their NAPA (National Adaptation Program of Actions) in 2006



Domestic production is small, with almost all consumer goods being imported. The main agricultural product is cocoa, whose production is largely exported, although exports volumes have declined in the last couple years due to weather related problems. Capital goods and fuels are also imported. Tourism is a relevant economic activity – generating more foreign currency inflow than cocoa – but still far from its potential in terms of exports, GDP contribution and job creation. As a result, STP presents a structural current account deficit that is normally compensated by some foreign direct investment and largely by external aid. This puts STP at risk of debt distress. Poverty in São Tomé and Príncipe disproportionately affects women. Close to 71.3 percent of households headed by women are affected by poverty, compared to 63.4 percent of those headed by men. Most female heads of households are single mothers with little education and their income is derived mainly from agriculture or from the informal sector.<sup>2</sup> Similarly, national unemployment, currently estimated at close to 14 percent, also disproportionately affects women, whose national unemployment rate stands at close to 20 percent.

**Despite its challenging development and macroeconomic situation, the country has recently made progress on the economic front.** After pegging the local currency to the Euro, inflation was brought to an all-time low of four percent in 2015. The country successfully implemented business environment reforms, bringing it to the top among African countries in some dimensions of the Doing Business survey. For 2016, GDP growth is projected to accelerate to 4.4 percent due to timely approval of the budget and elections. Inflation is expected to remain under control (the Central Bank projects three percent rate) and some fiscal consolidation is expected due to the International Monetary Fund (IMF) program, which requires the primary budget to be reduced.

**The small archipelago state of São Tomé and Príncipe (STP) is particularly vulnerable to climate-related hazards** such as floods, coastal/river mouth flash floods, storms and drought episodes. These events are very likely to become more frequent and more intense due to global climate change, have significant impacts on critical sectors such as agriculture, fisheries, and also transport. Most of the national infrastructure is located in low lying areas along the shoreline, port, airport, the oil reservoirs, hotels, and therefore, directly exposed to the elevation of the sea-level, which, in addition to increased consequences of coastal flooding, exacerbates the coastal erosion. Moreover, the coastline is already fragilized by unsustainable sand extraction practices. The developments in the coastal areas, often based on the plans developed during the colonial period, have not integrated those threats. For instance, the road connecting the airport to the city center was washed away by the sea around thirty years ago. The current road section was rebuilt 30 meters more inland, but in a place which will also be exposed to climate change impacts in the future.

#### Sectoral and Institutional Context

**The responsibility for all transport related activities in São Tomé and Príncipe (STP) fall within the Ministry of Infrastructure, Natural Resources and Environment (MIRNA).** STP has a total of 1,300 km of roads out of which 230 km are paved. The National Institute of Roads (INAE-Instituto Nacional das Estradas) manages the road network. Transport services are regulated by the Directorate for Transports and Communication (DTC). The National Road Fund (Fundo Rodoviário Nacional, FRN), an autonomous government fund is in charge of financing road maintenance activities. INAE is responsible for road maintenance, implements the road development strategy, plans road projects, and compiles and manages a road data base. Built on volcanoes, STP's population and economic activities are mainly located along the attractive coastlines. Therefore, a large part of the national road network (National Roads 1 and 2) is located along the coast. Stronger and increasingly unpredictable spring tides, combined with extensive sand mining, have led to high rates of coastline erosion (about 0.2-1.2 meters a year), which exacerbates the threat to the coastal infrastructures.

**STP uses performance based approach to maintain its road network.** This approach is mainstreamed as a road management practice through the national federation (FNAME -Federação Nacional para Manutenção de Estradas) of the associations in charge of road maintenance using results based approach, (Grupos de Interesse para Manutenção de

<sup>2</sup> IMF, Poverty Reduction Strategy Paper, 2014. <https://www.imf.org/external/pubs/ft/scr/2014/cr1409.pdf>.



Estradas, GIME). The Associations were established with the support of the European Development Fund in 2005. There are 32 GIMEs covering all the country and each GIME has on average 50 members, including 50% of women, from local communities. GIMEs carry out routine maintenance of both paved and unpaved roads. They also undertake a more elaborate road maintenance intervention such as filling pot holes and some coastal protection and slope stabilization works (i.e. Gabions). GIMEs used to cover the whole country's road network routine maintenance work (1300km) at an average unit cost of \$1000/km/year. However, GIMEs cover currently only 860 km due to budget constraints.

**The Sao Tome e Principe Road Fund (Fundo Rodoviário Nacional, FRN), established in 2005, is supposed to cover all routine maintenance needs** (US\$1.3 million/year) but has currently difficulties in mobilizing revenues (Fuel levy, vehicle license fee and a levy on vehicle insurance). Currently only the proceeds from vehicle license fees (\$0.25 m) are mobilized and channeled directly to the Road Fund. There is a need to support GIME and the Road Fund to consolidate this institutional set up and sustain the existing financing mechanism and improve road management practices. As a first step, a technical assistance is required to estimate road maintenance needs, the financing gap and the level of road user charges (fuel levy, vehicle license fee and levy on vehicle insurance) that are required to fill the financing gap. Further support is required to develop a road asset management system and to improve INAE, FRN and GIME technical and management capacity.

**Protection of road infrastructure against coastal hazards is a challenge.** The country's coastal roads and the urban road along the waterfront of Sao Tome city are particularly exposed to coastal hazards (erosion and inundation). The current coastal protection structures between the international airport to the city center are degraded. They no longer protect the sea front and some of the main roads from both the impacts caused by submersion, and by the erosion, affecting the pavement and the structure of the road. There are a few localized temporary interventions, but not at the scale which could protect the road infrastructure on the long term. Protecting Sao Tome sea front will contribute to tourism development as the waterfront area presents a significant tourism potential.

**Improved connectivity along the National Road N1 and coastal protection will lead to wider economic impact.** The National Road N1 provides transport access to around 60 % of Sao Tome's population. It connects Sao Tome (70,000 inhabitants)<sup>3</sup> to Guadalupe (20,000) and Neves (15,000) along a distance of 27 km. The paved road is 5-6 meters wide with a dangerous horizontal and vertical alignment. It is mostly in bad conditions and in need for rehabilitation. The average traffic is around 1500 vehicles/day with a high presence of motorcycles in urban/town areas. The road is also used by trucks to transport fuel and beer from Neves to the rest of the country. The last section (around 12 km) between Guadalupe and Neves has a long portion of coastal road bordering a non-stabilized high slope on the left and the sea on the right with occasional sea walls protection.

#### Relationship to CPF

**The proposed Project is well aligned with the WBG Sao Tome Country Partnership Strategy (CPS) FY2014-18.** The CPS places emphasis on creating an environment that encourages private sector investment in the tourism, fisheries, and agribusiness sectors. The proposed project contributes to the target of the CPS by rehabilitating key transport infrastructure to improve connectivity and access to gateways at both domestic and regional or international levels. The country's geographic morphology and location increases infrastructure vulnerability to climate changes effects. Therefore, increasing transport infrastructure's resilience is well aligned with the priorities outlined in the CPS.

**The project is also in line with the IMF 2012 Poverty Reduction Strategy Paper (PRSP-II)** which identified the need to overcome the lack of adequate physical infrastructure, particularly in the energy, telecommunications and transportation sectors, as an important constraint limiting opportunities for growth and development. The PRSP-II highlights STP's need to expand its access to information technology and better utilize air and water transport to reduce its isolation.

<sup>3</sup> 2012 population census



**The proposed project will contribute to the implementation of the “Nationally Determined Contributions (NDC)”** prepared by São Tomé and Príncipe for the twenty-first session of the Conference of the Parties (COP21). NDC summarizes the principal measures required to adapt to climate change risks. The main climate change adaptation measures stated in the NDC include resilience to erosion and maritime as well as river and storm flooding of coastal areas through improved coastal protection of vulnerable communities.

### **C. Proposed Development Objective(s)**

The proposed PDOs is to reduce road users’ cost and increase transport and urban infrastructure resilience to coastal erosion and rise of sea level

#### Key Results (From PCN)

The key expected results from the implementation of the project and the respective monitoring indicators are:

First dimension:

a) Reduce road users’ costs. This will be measured through:

- Indicator 1: Reduction in vehicle operating cost on the project road section (US\$/Km).
- Indicator 2: Reduction in travel time on the project road section (minutes).

b) Improve road safety on the project road section. This will be measured through:

- Indicator 1: Reduction in road accidents on the project road section (100 million vehicle-km).

c) reduce coastal flooding affecting project roads and the main city sea front

- Indicator 1: reduction of the occurrence of flooding of the marginal zones (number of overtopping/year)

Second dimension:

d) Breakwaters and protection walls installed in the project area

e) Slope stabilization and coastal erosion measures installed along the project road sections.

f) Road and coastal management strengthened

### **Project Beneficiaries:**

The Road National N1 from Sao Tome to Neves via Guadalupe will provide direct access to 105,000 people or around 60% of the total population of Sao Tome (2012). The coastal protection and rehabilitation of the Marginal road will reduce transport cost and improve road safety. This project component will also increase the area walkability, safety and tourism attractivity. The improved sea-front will also benefit the 70,000 population living in Sao Tome city. The primary project beneficiaries are the road users. Road-users are expected to benefit from the rehabilitation and road safety improvements including: (i) better road quality and level of serviceability; (ii) avoiding or deferring costly congestion bottlenecks expected on the basis of mid-term traffic projections; (iii) better road safety through new alignments to avoid hazardous crossing of urban areas by heavy transit traffic; and (iv) savings derived from shorter travel times. The Project will directly contribute to economic development by reducing transportation costs and linking communities to Sao Tome - a center for employment, and an outlet for agricultural products and commercial goods. Road safety improvements will also reduce the annual economic losses associated with road accidents. The proposed project will provide employment to the GIMEs’ communities.



#### D. Concept Description

The proposed transport development and coastal protection project is to rehabilitate National Road N1 from Sao Tome – Guadalupe – Neves (27 km), the rehabilitation of the Marginal road (6 km). The project will also strengthen the technical and management capacity of INAE, Road Fund and GIME. The proposed project will install coastal protections along the Sao Tome bays and climate resilience measures to protect the roads project from landslides and sea erosion.

The proposed project would consist of four components totaling **US\$60 million**:

**Component 1:** Sao-Tome - Guadalupe -Neves road rehabilitation - Civil Works and project supervision (Cost estimate: **US\$ 36.0 million**).

- (a) Rehabilitation of existing National Road N1 from Sao Tome to Neves (27 km). The paved road is 5-7 meters wide with a dangerous horizontal and vertical alignment. It is mostly in bad conditions and in need for rehabilitation. The average traffic is around 1500 vehicles/day with a high presence of motorcycles in urban/town areas. The road is also used by trucks to transport fuel and beer from Neves to the rest of the country. The road section between Guadalupe and Neves (around 12 km) is a coastal road bordering a non-stabilized high slope on the left and the sea on the right. The carriageway will be of asphalt pavement. The cost estimate is around **US\$ 34.5 million** including slope stabilization and coast protection (US\$ 6.5m). This cost estimates includes also contingencies;
- (b) Construction supervision and quality assurance services. The services to be financed will be for all civil works, including coastal protection. (Estimated Cost: **US\$1.5 million**).

**Component 2:** Institutional strengthening (Estimated Cost: **US\$ 3.5 million**): This project component will consolidate the road sector institutional set up and improve asset management practices, including:

- (a) Road maintenance as well small scale coastal and slope protections of priority national road sections using performance based approach, including technical and management capacity strengthening of GIME and local communities;
- (b) Strengthening the institutional capacity of the road fund an INEA in mobilizing road maintenance financing and improving road asset management system;
- (c) Increased participation of women in GIMEs (the Task Team will assess if it possible to target that 50% of GIME workers are women) and enhanced gender awareness through the provision of training to GIMEs' workforce (focus on specific issues will be determined by the results of the Social Assessment).

**Component 3:** Rehabilitation of the capital sea front Marginal road and its protection to coastal hazards, including civil works supervision cost (Estimated Cost: **US\$20.0 million**), including:

- (a) Coastal protection of 6 km of the shoreline of the capital São Tomé, which could consist in the rehabilitation of the existing seawalls, the construction of breakwaters to reduce the energy of the incoming waves or rock revetments to protect the beaches and assets. Most of the existing coastal protections have been built during the colonial period. The sea front is frequently inundated (at least 10 times per year) by wave overtopping during high tide periods. The infrastructure to be identified as part of the on-going study supported by the Dutch cooperation, will help to protect all the sea front from inundation and coastal erosion (estimated cost: US\$7.0 million)



- (b) Rehabilitation of the Marginal road (6.0 km), including the refection of the road revetment, the strengthening of pedestrians' sidewalks, improvement of the pedestrians 'safety with protected crossings. Due to poor maintenance, and no massive rehabilitation for the last decades, the transport infrastructures of the sea front, have been extensively damaged, preventing the site to fully exploit its touristic potential. (estimated cost: **US\$ 12.0 million**)
- (c) Construction supervision and quality assurance services. (Estimated Cost: **US\$1.0 million**).

**Component 4:** Project management support (Estimated Cost: **US\$0.5 million**). This project component will finance the operation and incremental costs of the Project Implementation Unit (PIU) including:

- (a) Implementation support to PIU for contract management for the main civil works and consulting services under the project;
- (b) Preparation of supporting studies for future transport and coastal protection projects.

## SAFEGUARDS

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

Sao Tome and Principe is located on the Equator, in the Gulf of Guinea, and consists of two main islands: São Tomé and Príncipe. Volcanic mountains fall steeply to the sea in the south and west of both islands. Elsewhere on the islands, mountains descend gradually to small plains in the northeast. The São Tomé Peak is the highest point on the islands, with a height of 6,640 feet above sea level.

Road infrastructure in Sao Tome and Principe is in a generally advanced state of deterioration, which has enhanced the difficulty to transit in many areas. Additional details regarding the salient physical characteristics of the project area will become available once the detailed designs have been finalized.

The proposed project activities will take place in the island of Sao Tome which is particularly vulnerable to climate related hazards floods, storms and drought episodes. The roads to be rehabilitated are located in low lying areas along the shoreline, directly exposed to the elevation of sea-level. The project will support civil works associated with the Rehabilitation of existing National Road N1 in component 1; Coastal protection of 6 km of the shoreline of São Tomé, with the rehabilitation of the existing seawalls, the construction of coastal defense, and the rehabilitation of the Marginal road (6.0 km), including the refection of the road revetment, the strengthening of pedestrians' sidewalks, improvement of the pedestrians 'safety with protected crossings, in component 3.

### B. Borrower's Institutional Capacity for Safeguard Policies

São Tomé and Príncipe has a general legal and institutional framework to manage and respond to the challenges on environmental issues. The National Environmental Law approved on December 31, 1999, provides for the administration of the environment and all the natural resources of São Tomé and Príncipe. Decree-Law No 37/99 defines the rules and principles applicable in the EIA which in summary, requires that all activities due to their nature, size or location, may have significant impacts on the environment, must present an environmental impact assessment prior to its implementation. The General Directorate of Environment (DGE) under the Ministry of Infrastructure, Natural Resources



and Environment (MIRNA), is the central institution responsible for environmental issues; it coordinates and implements government activities and policies in the environmental sector. The DGE team has experience on dealing with environmental and social safeguard requirements from different donors, including the World Bank Group.

The National Institute of Roads (INAE-Instituto Nacional das Estradas) is also under MIRNA however, INAE is not familiar with the Bank operations and, fiduciary guidelines and safeguards policies. The proposed project will be the largest project in Sao Tome & Principe managed by the MIRNA and the first project to be financed by the World Bank in the transport sector. A dedicated environmental safeguards point should be hired and capacity building for the PIU staff will be needed to ensure that the project remains in full compliance with Bank Safeguard Policies as well as National Legislation throughout project implementation.

**C. Environmental and Social Safeguards Specialists on the Team**

- Paivi Koskinen-Lewis, Social Safeguards Specialist
- Melissa C. Landes, Environmental Safeguards Specialist
- Ivan Matias Besserer Rayas, Social Safeguards Specialist
- Leandre Yameogo, Environmental Safeguards Specialist
- Nadia Henriqueta Gabriel Tembe Bilale, Environmental Safeguards Specialist

**D. Policies that might apply**

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>The project will mainly consist of road improvements, coastal protection, construction of breakwaters, and stabilization of slopes which could lead to some adverse environmental and social impacts such as siting, solid and liquid waste generation, noise, vibration, dust emission, increased traffic, including risks to the health and safety of the construction workers and surrounding communities. Given the nature of the foreseen works, the project is classified as category B for Environmental Assessment (EA) purposes since potential environmental and social impacts are site-specific, minimal, and can be easily mitigated using appropriate measures and tools.</p> <p>The borrower will prepare an ESIA for activities pertaining to the rehabilitation of the National Road N1 (Component 1). Additionally, an ESMF will be developed for the entire project area, and preliminary ESIA's will be developed for the coastal protection works and the rehabilitation of the six kilometers of marginal road (Component 3). All Instruments will be consulted, reviewed, and disclosed prior appraisal.</p>



A Social Assessment (SA) will be undertaken and will form part of the ESMF and ESIA's. Among other objectives, the SA will: (1) Identify if there are opportunities to further include women in the work undertaken by the Grupos de Interesse de Manutenção de Estradas (Road Maintenance Interest Groups or GIMEs, for their acronym in Portuguese) and determine specific issues pertaining to gender that should form part of GIME's gender awareness training; (2) Identify if there are specific vulnerable subgroups (e.g. women, youths, the elderly; people with disabilities) that may be at a disproportionately high risk of being negatively affected by the project, or of not benefitting from the project, and the measures that should be taken to ensure that vulnerable subgroups are not disproportionately affected and are equally benefited by the project; and (3) assess positive and potentially adverse social impacts, including impacts related to community health and safety (including road transport behaviors that may affect the safe use of transport services, including drunk driving, unsafe driving, limited use of safety features) ; labor and working conditions (including labor influx); sexual and gender based violence; economic losses due to temporary business disruption during civil works; and increased opportunities for local employment in project-related activities.

Performance Standards for Private Sector Activities OP/BP 4.03 No

Natural Habitats OP/BP 4.04 Yes

Project investments are not expected to directly affect the quality or the status of natural habitats as defined in the OP/BP 4.04. Notwithstanding, this policy is preventively triggered, as some civil works will be carried out in the vicinity of natural habitats or fragile ecosystems. Such works will include the rehabilitation of existing seawalls, the construction of breakwaters to reduce the energy of the incoming waves, rock revetments to protect beaches and boats, under Component 3 that may lead to some unforeseen negative impacts on natural habitats. The safeguard instruments (ESMF and ESIA's) will include provisions to ensure that likely negative impacts to natural habitats are adequately captured and taken into consideration during sub projects preparation and implementation.



Forests OP/BP 4.36	No	This policy is not triggered as no forests will be affected by project activities.
Pest Management OP 4.09	No	This policy is not triggered given that project activities will not (i) involve the purchase or use of pesticides and/or pesticide application equipment and (ii) directly or indirectly significantly increase pesticide use and its associated health and environmental risks.
Physical Cultural Resources OP/BP 4.11	Yes	Civil works to be carried out under this project will involve excavations; earth movements and land clearing that could inadvertently affect places or objects of significant archeological or cultural value that should be protected. Hence, this policy is triggered to ensure that a “chance finds procedures” and any applicable national guidelines are followed should such artifacts or places be encountered during project implementation. Such measures and guidelines will be adequately included in the safeguard instruments (ESMF and ESIA).
Indigenous Peoples OP/BP 4.10	No	This policy is not triggered because, in Sao Tome and Principe, there are no groups of people who meet the four criteria to be defined as indigenous under this Policy.
Involuntary Resettlement OP/BP 4.12	Yes	OP 4.12 on Involuntary Resettlement is triggered for this project. Civil works associated with road rehabilitation and the erection of coastal protection barriers, may require the temporary or permanent physical displacement of houses and businesses close to subproject locations, and may lead to temporary physical and/or economic displacement. The borrower will prepare a Resettlement Action Plan (RAP) for activities pertaining to the rehabilitation of the National Road N1 (Component 1). Additionally, an RPF will be developed for the entire project area, and draft RAPs will be developed for the coastal protection works and the rehabilitation of the six kilometers of marginal road (Component 3). Instruments will be consulted, approved, and disclosed prior appraisal.
Safety of Dams OP/BP 4.37	No	This policy is not triggered given that the Project will not support the construction or rehabilitation of dams nor will support other investments which rely on the services of existing dams.
Projects on International Waterways OP/BP 7.50	No	This policy is not be triggered because the project will not affect international waterways as defined under the policy.



Projects in Disputed Areas OP/BP 7.60	No	This policy is not be triggered because the proposed project will not affect disputed areas as defined under the policy.
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### **E. Safeguard Preparation Plan**

Tentative target date for preparing the Appraisal Stage PID/ISDS

Feb 08, 2018

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

The two frameworks will be started immediately to ensure their completion and approval and disclosure prior to appraisal. The Social Assessment will be conducted so that its results can inform the social aspects within all tasks of the project.

### **CONTACT POINT**

#### **World Bank**

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#### **Borrower/Client/Recipient**

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