

## INTEGRATED SAFEGUARDS DATASHEET APPRAISAL STAGE

Report No.:

Date prepared/updated: 19 May 2009

### I. Basic Information

#### 1. Basic Project Data

Country: Argentina		Project ID: P108306	
		Additional Project ID (if any):	
Project Name: Petrobras (PESA) Gas Transport System Project			
Task Team Leader: Roberto G. Aiello			
Estimated Appraisal Date:		Estimated Board Date:	
Managing Unit: LCSEG		Lending Instrument: World Bank as a trustee of the Spanish Carbon Fund (SCF)	
Sector: Power (50%), O&G (50%)			
Theme: Climate Change (P) and Power generation (S)			
IBRD Amount (US\$m.):			
IDA Amount (US\$m.):			
GEF Amount (US\$m.):			
PCF Amount (US\$m.): US\$2,700,000.00 (Spanish Carbon Fund, TBD)			
Other financing amounts by source:			
Environmental Category: B			
Is this a transferred project	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Simplified Processing	Simple <input checked="" type="checkbox"/>	Repeater <input type="checkbox"/>	
Is this project processed under OP 8.00 (Rapid Response to Crises and Emergencies)	Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>

#### 2. Project Objectives:

The project development objectives are to reduce (1) GHG emissions from PESA's pipelines' turbo-compression plant, and (2) to contribute towards mainstreaming cleaner, more environmentally sound technologies in the power sector in Argentina by demonstrating the potential of carbon finance to catalyze and advance environmentally beneficial practices.

#### 3. Project Description:

The proposed Petrobras Gas Transport system Project has one single component, which is the recovery of exhaust waste heat gases from the Fiat-Cerri Plant. The captured gases will then be used to generate electricity that will be sold to the national grid. The currently installed turbines in the turbo-compression plant, being of an old low-efficiency model, are perfectly adequate for this type of project. By preventing the release of CO<sub>2</sub> and N<sub>2</sub>O in the atmosphere and further displacing electric power from conventional thermal plants, the project will generate ERs that will be certified, monitored, and sold to the SCF. The resulting income will help make this project financially more attractive and could foster similar GHG mitigation projects in a sector

where there are neither incentives nor regulations aimed at promoting energy efficiency and where demand for electricity is covered through additions to conventional thermal generation capacity.

Fiat-Cerri compression plant will be the first CDM project of its kind in Argentina. It will contribute to the ultimate goal of the Convention on Climate Change (UNFCCC) by reducing the greenhouse gas emissions caused by the present and future use of fossil fuels for electricity generation in Argentina without disturbing the current gas transport system. The development of the proposed project will also contribute to sustainable development and to the growth of environmental awareness and the spread of climate change information throughout the communities involved. It will also help to establish a new model of power generation to be replicated in other compression plants along the pipeline system in Argentina.

The technology option selected for this project consists in a waste gas or waste heat based cogeneration system. Recovered waste gas and heat from the Fiat Cerri plant would be used in a single boiler linked to one steam turbo-generator. Waste heat recovery and waste gas recovery are proven technologies, and the project will fall under the AMS-III.Q, version 2, a methodology for "Waste Energy Recovery (gas/heat/pressure) Projects"

The energy recovered from the waste heat gas will be used for steam production that will then feed steam turbines for electricity generation. Part of this electricity will be used at the compression plant while the remaining will be sold to the public national grid. The clean energy generated by the Fiat-Cerri plant will reduce the carbon emissions below the baseline scenario by reducing the use of fossil fuels for electricity generation.

The project will recover the waste gas from the gas turbine that powers the turbo-compressor at the NG compression plant. The waste gas is currently released to the atmosphere at 450 °C. The steam power plant will generate steam in a heat recovery steam generator (HRSG); then, the generated steam will produce electricity through a steam turbine coupled to an electricity generator. In order to keep constant power output, the HRSG will burn auxiliary fuel -NG extracted from the main pipeline- whenever the turbo compressor runs at low load or is shut-off for maintenance. This system can operate 24 hours a day, 365 days a year. The installed capacity under normal operation conditions of the turbo-compressor will be 14 MW.

The steam will be expanded through the steam turbine which is coupled to an electricity generator through a gear box; a well-known commercially available technology. To optimize electricity generation, the system will have a by-pass mechanism to control the pressure of the steam going to the steam turbine, and therefore the power output of the generator. A refrigeration system will condensate the steam released by the steam turbine. The refrigeration system will use an induced draft cooling tower to cool down the refrigeration water. Regulated steps, low noise level axial blower will be used in the cooling tower. All liquid effluents generated by purges will be pumped to the discharge pipe of the plant. The output voltage of the generator will be 33 kV and will be transported from the power plant to the boundary of the plant where a substation will be installed. The substation will connect the power plant to the grid and measure the net power delivered.

The power plant will be connected to the national grid operated by EDES (*Empresa Distribuidora de Energía del Sur*), the company responsible of energy distribution in the Argentina's southern region.. Under normal operation conditions of the turbo-compressors, the energy contained in the waste gas will be enough to produce the steam required for the steam turbine to keep constant power output from the power plant. In case the turbo-compressor runs under off-rated condition or is shut-off for maintenance or any other reason, the waste gas from the gas turbine will be insufficient to produce the required steam; that is when the HRSG would burn auxiliary fuel.

The geographical scope of project involves:

- The industrial facility where waste gas is generated
- The facility where electricity is generated including auxiliary equipment
- The facility where electricity is used, that is the compression plant and the grid since part of the electricity is exported

#### **4. Project Location and salient physical characteristics relevant to the safeguard analysis:**

The project will be developed in the context of the Fiat-Cerri plant, which is part of the wider TGS industrial complex in the city of General Cerri, Buenos Aires province, a peri-urban area close to Bahía Blanca city. The project's area of influence is completely rural and lacks productive activities. There are no key aspects to be considered relating to the physical location and characteristics of the project area. There are no large numbers of communities that live in close proximity to the plant which could be exposed to any project risk. Only small industrial facilities can be found in the surroundings. Three pipelines reach the complex: *Neuba I* (Neuquén-Bahía Blanca-Buenos Aires), *Neuba II* (Neuquén-Bahía Blanca-Buenos Aires) and *Gral. San Martín* (Tierra del Fuego-Bahía Blanca-Buenos Aires). The Saladillo stream, adjacent to the plant, is the natural drainage of the area. Discharges from the TGS complex can reach the stream under an exceptional basis. If this happened, discharges would be properly treated before reaching the stream.

#### **5. Environmental and Social Safeguards Specialists on the Team:**

Mr. Marcelo H. Acerbi , LCSEN

<b>6. Safeguard Policies Triggered (please explain why)</b>	<b>Yes</b>	<b>No</b>
<b>Environmental Assessment (OP/BP 4.01)</b>	X	
<b>Natural Habitats (OP/BP 4.04):</b> Within the project's immediate area of influence, there are no terrestrial ecological reserves and no existing aquatic reserves.		X
<b>Forests (OP/BP 4.36):</b> There are no forests affected by the project and there are no activities proposed which would promote improved forest management. Therefore no action is required under this policy.		X
<b>Pest Management (OP 4.09):</b> The use of pesticides is not expected.		X
<b>Physical Cultural Resources (OP/BP 4.11):</b> Proposed civil works construction do not show any evidence of physical cultural resources that will require mitigation or management measures. Therefore, this policy is not triggered.		X
<b>Indigenous Peoples (OP/BP 4.10):</b> There are no indigenous people affected by this project and therefore no action required under this policy.		X
The project's single component will be constructed inside a PESA partner company's property and does not require land acquisition or resettlement. This policy is not triggered.		X
<b>Safety of Dams (OP/BP 4.37):</b> This project does not involve dams.		X
<b>Projects on International Waterways (OP/BP 7.50):</b> This project does not involve international waterways. Therefore, no action is required under this policy.		X
<b>Projects in Disputed Areas (OP/BP 7.60):</b> The project is not being implemented in any area known to be the subject of international dispute and therefore no action is required under the policy.		X

## **II. Key Safeguard Policy Issues and Their Management**

### **A. Summary of Key Safeguard Issues**

**1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:**

For all works contemplated under the single component of the project, the company prepared an environmental assessment following the environmental management guidelines to be adopted by the company and contractors during construction and operation phases. The project's main objective is to reduce the release of CO<sub>2</sub> and NO<sub>2</sub> into the atmosphere, as being powerful greenhouse gases. The project is expected to have no negative environmental effects. The project would produce an increase in local energy supply in a region characterized by a low supply compared to demand. It would also reduce air pollution from compression plant turbines through a recovery process of exhaust gas/heat, making efficient use of available energy and promoting the displacement of polluting and GHG emitting conventional thermal generation.

Overall, the environmental benefits of this CF project are expected to outweigh the environmental costs of the program. The expected benefits include preventing the release of CO<sub>2</sub> and N<sub>2</sub>O into the atmosphere and further displacing electric power from conventional thermal plants.

During the environmental assessment process, the construction and set up of a power plant was analyzed. The complexity of works, eventual impacts on urban areas and socio economic issues, impacts on the environment were considered. The interferences with other utilities inside the project specific location were detected during field survey. The results of the environmental assessment prepared by the company indicate important differences on the nature and magnitude of impacts between the construction and operation phases. During the construction phase, there will be important movements of workers and equipments associated to the execution of works. As this will happen inside the Fiat-Cerri Plant, special attention should be devoted to risk management in order to avoid damages to the existing conduction infrastructure. Proper operation of the Fiat-Cerri plant is critical for the provision of adequate gas supply. Therefore, a failure in the industrial complex during construction could pose a potential problem for the national network of gas transport. The project will create new jobs during construction, operation and maintenance of the plant.

This generation plant requires important water volumes (the company requested a permit to extract 90m<sup>3</sup>/h). These volumes would be taken from 2 deep perforations (around 750 and 900m each), with an estimated flow between 45 y 60 m<sup>3</sup>/h each. At a regional level, the use of the aquifer is low; water supply for the cities of *Bahía Blanca* and *Gral. Cerri* comes from "*Dique Paso de Las Piedras*" and is provided by the provincial water company (ABSA).

In terms of air quality, an assessment of the atmospheric impact has been conducted. The results of the model have been compared with the standards available for the Buenos Aires province. The model was run with CO and NO<sub>x</sub> as parameters. The outcomes indicated that although there are no critical receptors in the immediate area of influence of the project, it will be essential to keep on monitoring air quality, especially NO<sub>x</sub>, during the operational phase. However, pollution loads are expected to be reduced and favored by the high dilution factor resulting from the existing winds in the region.

During the operational phase, the project will generate clean energy by using waste gas heat and a small amount of auxiliary fossil fuel, therefore saving natural gas and non-renewable resources and reducing CO<sub>2</sub> emissions below the baseline scenario. However, this investment could represent an additional risk as it will expand the demand in capacity of response to eventual emergencies, increasing the prevention efforts and specific set of measures needed to address contingencies and emergencies. Performance risk is similar to that of any projects, although in this case, technological risk is lower since this project will implement a proven mature technology. As the power plant becomes operational, it will create 10 direct jobs and a similar number of indirect ones.

In the light of the specific environmental assessment conducted by the company, and considering both the impacts and the proposed mitigation measures in the environmental management plan, it

can be concluded that the overall impact of the project will be focused and restricted in terms of intensity and complexity. Given the benefits of the project, which by means of technology will ensure the reduction of GHG emissions and reduce the use of oil as a fuel to generate electricity, the overall impact of the project will be highly positive.

Based on the considerations described above, the proposed project is classified as *Category B*. Its impacts are site-specific and all of them can be managed through the implementation of well-know mitigation measures. The project's EA examines the project's potential negative and positive environmental impacts and recommends any measures needed to mitigate and monitor adverse impacts and improve environmental performance.

In general terms, regulations do not constrain the industrial facility that generates waste energy from using fossil fuels prior to the implementation of the project activity. At the federal level, there is no legal obligation for the assessment of the environmental impacts of industrial activities; however, the Argentine Office for the Clean Development Mechanism (OAMDL), the Designated National Authority that approves CDM projects and delivers the Letter of Approval for them in Argentina, may require to the corresponding provincial environmental authorities the authorization of the proposed project activity. The Buenos Aires province, through Law N° 11723, Article 10, establishes that all projects that could produce impacts or have susceptibility to affect the environment of the province or its natural resources have to obtain an Environmental Impact Declaration delivered by the provincial authority according to the categories established by the existing regulation. All persons or companies, public or private, who own a new project affected by Article 10 have to present an Environmental Assessment Impact (EIA) jointly with the project documentation. The site hosting this project has already received the Environmental Impact Declaration. In particular, and during the CDM national approval process, PESA will submit to the OAMDL the Fiat-Cerri power plant project.

**2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:**

The long term environmental impacts of the project are expected to be positive. As mentioned above, the project will ensure the reduction of GHG emissions to the atmosphere, reducing in particular the use of oil as a fuel to generate electricity, improving its supply by making an efficient use of the available energy. No adverse impacts associated with the operation of the project are expected to occur. The pollution loads are expected to be reduced and favored by the high dilution factor resulting from the existing winds in the region.

**3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts:**

No additional technical or location alternatives were considered for the project as it strictly depends on the functioning of the Fiat-Cerri plant, where the project's single component will capture gases from a turbo-compression plant to generate electricity that will be sold to the national grid.

The new activities involved in the plant will address two main issues: energy supply shortages and GHG emission reductions. In fact, the proposed activities will strengthen energy efficiency for electricity generation through the use of waste gas heat that otherwise would be released to the atmosphere, and will achieve GHG emission reductions below the baseline scenario for present and future electricity generation. In addition, the activities to be developed in the plant will trigger the implementation of well-known technologies based on new sources of energy and promote the diversification of the current energy mix. Furthermore, the inclusion of these activities into CDM became a strategic activity into the corporate policy of PESA promoting the inclusion of cost-efficient pilot projects that keep up the leadership of the company in the energy sector.

**4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described:**

PESA is a subsidiary of PEPSA (Petrobrás Energía Participaciones), an integrated energy company with operations in Argentina, Brazil, Venezuela, Peru, Ecuador, Colombia and Bolivia. PESA has more than 20 years of experience in construction, operation and maintenance of electric power plants, as well as power transmission along company-owned lines.

PESA carried out an Environmental Assessment of the project which includes a project description; an overall environmental impact matrix for the different project phases and an overall prevention plan. This report, which includes the aforementioned study on dispersion of gases for the Cerri Industrial complex that shows dispersion values under the threshold parameters established by law, has been submitted to the National Electricity Regulation Authority (ENRE). PESA reported that the approval process has been completed.

Said EA report was reviewed by the Bank. In addition, two field visits were carried out in order to check on the existing operating conditions in the Cerri Industrial complex and checking on compliance with existing regulations. In light of the Bank's review and based on a new outline proposed by the Bank, PESA prepared a new Environmental Assessment report including specific guidelines for the preparation of an Environmental Management Plan.

The proposed Petrobras Gas Transport system Project has a single component, which is the recovery of exhaust waste heat gases from the Fiat-Cerri plant (14 MW capacity), which is part of a wider industrial complex in the city of General Cerri, Buenos Aires province, whose owner is Transportadora de Gas del Sur (TGS) SA.

This Cerri industrial complex, operated by TGS, has obtained the following certifications and licenses:

- October 1998: ISO 14001:1996
- December 2001 ISO 9001:2000
- December 2004: Renewal of ISO 14001 and 9001
- December 2005: ISO 14001:2004
- August 2006: OHSAS 18001:1999

- August 2008: Organismo Provincial de Desarrollo Sustentable, Certificate of Environmental Aptitude for the TGS Cerri Industrial complex.

The proposed project will have to comply with all these licenses and their corresponding procedures.

PESA has a strong organizational structure and sufficient financial resources to manage the measures and procedures necessary to carry out the proposed activities that will reduce GHG emissions in the Fiat Cerri Plant (operated by TGS). PESA will be responsible for keeping the records and producing all monitoring reports in accordance with the measures described in the environmental management plan. PESA has contractual agreements with TGS to assure the provision of the waste heat gas from the turbo-compressors and also for the production of steam. In particular, the venue for the project (Fiat-Cerri), the TGS Cerri industrial complex, does not have an Environmental Impact Assessment Report as it was constructed before the impact assessment legislation was enacted in Buenos Aires province. However, there are two procedures linked to safeguards that the project should comply with:

- 1) The owner of the complex, TGS, must obtain all the allowances and authorizations required by the environmental legislation for the projected works. This includes an "Environmental Aptitude Certification" (*Certificado de Aptitud Ambiental*) awarded by the *Organismo Provincial de Desarrollo Sustentable (OPDS)* of Buenos Aires province, as well as another from the Water Authority and also from the Environmental Secretary in Bahía Blanca city, an important urban area close to the Cerri complex. The OPDS certificate was awarded and dated 28 August 2008.
- 2) PESA, being responsible for the project, must obtain all the allowances and authorizations required by the *Ente Nacional Regulador de la Electricidad (ENRE)*. On November 22, 2007, the ENRE confirmed –based on a presentation of environmental documents submitted by PESA to said agency– that "*the company had addressed with detail a set of environmental aspects related to the initiative and that had well-weighted the potential project's impacts*".

In operational terms, the implementation and supervision of safeguard issues related to this project will be in charge of the Quality, Security, Environmental and Occupation Health Unit in PESA.

In terms of the company's policies, environment and health management is an integral part of Petrobras' operations. Those policies have been translated into company-wide *Integrated Quality, Safety, Environment and Health Management Systems*, which apply to all the activities controlled and operated by Petrobras Energía. Thus, each operation's efforts and resources are focused on compliance with stated objectives, critically reviewing performance for continuous improvement. Today, the company has certifications relating to Environment (ISO 14001), Quality (ISO 9001) and Occupational Health and Safety (OHSAS 18001/IRAM 3800), which are maintained current through third party periodic audits.

The Petrobras Group of companies in Argentina commits to develop its activities, through its controlled and/or operated companies, preserving the environment where it operates, and the safety and health of its personnel, contractors and neighboring communities. The Company's Management considers this policy as an integral part of its businesses and therefore a priority at the managerial level, ensuring its dissemination, understanding and compliance at all organizational levels. For that purpose, the company has declared the adhesion to the following principles and guidelines: (i) Educate, train and get employees involved with the Safety, Environment and Health aspects, including vendors, communities, competent bodies and other interested parties, (ii) Be involved in the promotion of health, the protection of the human being and the environment by means of identification, control and monitoring of risks, conforming process safety to the best world practices and being ready for any possible emergencies, (iii) secure sustainability of projects, developments and products during all their life cycle, considering the impacts and benefits in economic, environmental and social terms, and (iv) Consider eco efficiency in operations, reducing local adverse impacts inherent to the industry activities.

**5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people:**

As part of the project preparation process, stakeholder consultation and information disclosure has been carried out through the company's website. Information on the project and its components has been made publicly available through a stakeholder consultation and workshop carried out during 29 September 2008. The consultation meeting took place in the Cerri industrial complex. During the meeting, the project and its associated impacts were presented. The questions and perception of community representatives were surveyed and queries were answered by the company. There were no objections against the proposed project.

PESA offers alternative mechanisms available to citizens who wish to seek information or complain if they feel that the project does not adequately address their needs or concerns. There is a company consultation mechanisms through the Ombudsman (created within Petrobras website, with the objective of channeling comments and proposals from civil society organizations to PESA's management).

<b>B. Disclosure Requirements Date</b>	
<b>Environmental Assessment/Audit/Management Plan/Other:</b>	
Was the document disclosed <i>prior to appraisal</i> ?	Yes
Date of receipt by the Bank	11-14-2008
Date of "in-country" disclosure	09-29-2008
Date of submission to InfoShop	04-04-2009
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	NA
<b>Resettlement Action Plan/Framework/Policy Process:</b>	
Was the document disclosed <i>prior to appraisal</i> ?	NA
Date of receipt by the Bank	NA
Date of "in-country" disclosure	NA

Date of submission to InfoShop	NA
<b>Indigenous Peoples Plan/Planning Framework:</b>	
Was the document disclosed <i>prior to appraisal</i> ?	NA
Date of receipt by the Bank	NA
Date of "in-country" disclosure	NA
Date of submission to InfoShop	NA
<b>Pest Management Plan:</b>	
Was the document disclosed <i>prior to appraisal</i> ?	NA
Date of receipt by the Bank	NA
Date of "in-country" disclosure	NA
Date of submission to InfoShop	NA
<b>* If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.</b>	
<b>If in-country disclosure of any of the above documents is not expected, please explain why:</b>	
NA	

*C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)*

<b>OP/BP 4.01 - Environment Assessment</b>			
Does the project require a stand-alone EA (including EMP) report?	Yes [ X ]	No [ ]	N/A [ ]
If yes, then did the Regional Environment Unit or Sector Manager (SM) review and approve the EA report?	Yes		
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?			
<b>OP/BP 4.04 - Natural Habitats</b>			
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes [ ]	No [ X ]	N/A [ ]
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	NA		
<b>OP 4.09 - Pest Management</b>			
Does the EA adequately address the pest management issues?	Yes [ ]	No [ X ]	N/A [ ]
Is a separate PMP required?	Yes [ ]	No [ X ]	N/A [ ]
If yes, has the PMP been reviewed and approved by a safeguards specialist or Sector Manager? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?	NA		
<b>OP/BP 4.11 - Physical Cultural Resources</b>			
Does the EA include adequate measures related to cultural property?	Yes [ ]	No [ ]	N/A [ X ]

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on physical cultural resources?	NA
<b>OP/BP 4.10 - Indigenous Peoples</b>	
Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes [ ]      No [ ]      N/A [X ]
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?	NA
If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit?	NA
<b>OP/BP 4.12 - Involuntary Resettlement</b>	
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes [ ]      No [ ]      N/A [X ]
If yes, then did the Regional unit responsible for safeguards or Sector Manager review and approve the plan/policy framework/process framework?	NA
<b>OP/BP 4.36 – Forests</b>	
Has the sector-wide analysis of policy and institutional issues and constraints been carried out?	Yes [ ]      No [ ]      N/A [X ]
Does the project design include satisfactory measures to overcome these constraints?	NA
Does the project finance commercial harvesting, and if so, does it include provisions for certification system?	NA
<b>OP/BP 4.37 - Safety of Dams</b>	
Have dam safety plans been prepared?	Yes [ ]      No [ ]      N/A [X ]
Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?	NA
Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?	NA
<b>OP/BP 7.50 - Projects on International Waterways</b>	
Have the other riparians been notified of the project?	Yes [ ]      No [ ]      N/A [X ]
If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?	NA
What are the reasons for the exception? Please explain:	NA
Has the RVP approved such an exception?	NA
<b>OP/BP 7.60 - Projects in Disputed Areas</b>	

Has the memo conveying all pertinent information on the international aspects of the project, including the procedures to be followed, and the recommendations for dealing with the issue, been prepared	Yes [ ]      No [ ]      N/A [X ]
Does the PAD/MOP include the standard disclaimer referred to in the OP?	NA
<b>The World Bank Policy on Disclosure of Information</b>	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [ X ]      No [ ]      N/A [ ]
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Documents have been disclosed in-Petrobrás (PESA) website in Argentina.
<b>All Safeguard Policies</b>	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [X ]      No [ ]      N/A [ ]
Have costs related to safeguard policy measures been included in the project cost?	The costs will be absorbed by those related to the implementation of the already existing environmental management system.
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	The environmental management system -which already exists in the company and which has been verified and certified by external auditors- will be applied to monitor safeguards related issues.
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	TBD

#### D. Approvals

<b>Signed and submitted by:</b>	<b>Name</b>	<b>Date</b>
Task Team Leader:	Roberto G. Aiello	
Environmental Specialist:	Marcelo H. Acerbi	27/05/09
Social Development Specialist	-	
Additional Environmental and/or Social Development Specialist(s):	-	
<b>Approved by:</b>		
Regional Safeguards Coordinator:	Reidar Kvam	
Comments: Approval not required		
Sector Manager:	Philippe Charles Benoit	29/5/09
Comments:		

(Template Version November 2007)