



Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 05-Apr-2024 | Report No: PIDISDSA37022



BASIC INFORMATION

A. Basic Project Data

Country Pakistan	Project ID P181423	Project Name Second Additional Financing for Dasu Hydropower Stage I Project	Parent Project ID (if any) P121507
Parent Project Name Dasu Hydropower Stage I Project	Region SOUTH ASIA	Estimated Appraisal Date 20-Mar-2024	Estimated Board Date 23-May-2024
Practice Area (Lead) Energy & Extractives	Financing Instrument Investment Project Financing	Borrower(s) Islamic Republic of Pakistan	Implementing Agency Water and Power Development Authority (WAPDA), National Transmission and Despatch Company

Proposed Development Objective(s) Parent

The overall project development objective is to facilitate the expansion of electricity supply of hydro-power in Pakistan. The Project would also improve access to socio-economic services for local communities in the project area and build WAPDA’s capacity to prepare future hydropower projects. This would be achieved by installing a 2,160 MW hydropower plant on the main Indus River, which can be expanded to 4,320 MW in future at very low cost. The Project is a “high-risk-high reward” operation aimed at providing low cost non-carbon renewable energy.

Components

Component A: Construction of the Main Hydraulic Structure on the Indus River (of which IDA \$10.0 million)

Component B: Power Generation Facilities

Component C: Preparatory Works (of which IDA \$183.9 million)

Component D: Transmission Line (of which IDA \$15.0 million, IBRD \$700million)

Component E: Implementation of Social and Environmental Management Plans, and Glacial, Sediment River Monitoring (of which IDA \$266.5 million)

Component F: Construction Supervision, Monitoring and Evaluation of the Project Impacts and Social and Environmental Management Plans (of which IDA \$53.0 million)

Component G: Project Management Support, Capacity Building of WAPDA, Technical Assistance and Training (of which IDA \$60.0 million)

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY



Total Project Cost	160.50
Total Financing	2,116.60
of which IBRD/IDA	1,000.00
Financing Gap	-1,956.10

DETAILS

World Bank Group Financing

International Bank for Reconstruction and Development (IBRD)	200.00
International Development Association (IDA)	800.00
IDA Credit	365.00
IDA Shorter Maturity Loan (SML)	435.00

Non-World Bank Group Financing

Counterpart Funding	125.00
Borrowing Agency	125.00
Commercial Financing	991.60
Unguaranteed Commercial Financing	991.60

Environmental Assessment Category

A-Full Assessment

Decision

The review did authorize the team to appraise and negotiate

1

¹ The "Total Project Cost" in above Data Sheet refers to the additional cost relative to the Parent Project approved in 2014. The total cost of the Project including this Additional Financing (AF) is now US\$ 4,855.3 million. This AF provides an additional US\$ 1,000 million IBRD/IDA relative to the already approved US\$ 1,198 million. Together with further commercial funding this reduces the Financing Gap with US\$ 1,956.1 million compared to what was anticipated in the Parent Project. With this AF the anticipated Financing Gap for the Project is zero.



B. Introduction and Context

The Dasu Hydropower Project (DHP) utilizes one of the best hydropower sites in the world and is a game changer for the Pakistan energy sector. With a very small footprint, the DHP will add at least 4,320² megawatts (MW) of renewable energy, which will contribute to “greening” the Pakistani energy sector and lower the average electricity cost Stage I of the DHP (DHP-I) which is currently under construction, will have 2,160 MW capacity and generate 12,225 gigawatt hours (GWh)/year. DHP-I will save Pakistan an estimated US\$1.8 billion annually in hard currency by replacing imported fuels. It will offset 5 million tons (t) of carbon dioxide (CO₂). The project is essential for Pakistan to reverse its dependence on fossil fuel and reach 60 percent renewable energy by 2031. The Dasu Hydropower Stage II Project (DHP-II) will add 2,160–3,240 MW from the same dam at a low cost so that the fully completed DHP will offset over 8 million tCO₂. The annual economic benefit from DHP will be in the range of US\$3–3.4 billion.

This AF was envisaged at appraisal of DHP-I in 2014. DHP-I is a very large investment with long gestation and was planned in stages. An innovative financing strategy, endorsed by the Board in 2014, envisaged that a mix of IDA and commercial financing will be arranged for DHP-I in a phased manner and share of IDA financing will be adjusted if commercial financing is not available. The strategy raised commercial finance based on the pace of implementation, followed by additional loans/credits from the World Bank when required. The original IDA credit of US\$588.4 million, focusing on preparatory works and environmental and social management for DHP-I, was approved by the Board of Directors on June 10, 2014. A partial credit guarantee (PCG) of US\$460 million to mobilize funding to start the main construction works of DHP-I was approved at the same time.³ The first AF of US\$700 million from the International Bank for Reconstruction and Development (IBRD) was approved on March 30, 2020, to finance the Dasu Transmission Line (TL) to be implemented by the National Transmission Despatch Company (NTDC). In Pakistan’s current macroeconomic environment, international commercial financing cannot be mobilized by WAPDA. The financing strategy thus recommended allocation of additional IDA financing to complete DHP-I.

The proposed AF will address a financing gap for construction costs for the hydropower facilities implemented by the Water and Power Development Authority (WAPDA). AF of US\$1 billion from the Bank is timed to ensure WAPDA has the financing for finalizing the hydropower component, as the original IDA credits will soon be exhausted. The US\$1 billion would be composed of three parts: (i) US\$435 million of IDA Short Maturity Loan (SML); (ii) US\$365 million of Regular IDA Scale-Up Window (SUW); and (iii) an IBRD Loan of US\$200 million. The AF includes extension of the closing date of DHP-I (including the IDA Partial Credit Guarantee, P150756) to December 31, 2028. This extension will enable the completion of all ongoing activities under DHP-I, and the achievement of the Project Development Objective (PDO). It will also enable the possible use of the remaining US\$250 million of the guarantee to raise additional commercial financing for the Project. AF does not include any new activities. The PDO and components remain unchanged.

Application of Safeguards instead of ESF. The proposed AF is prepared in accordance with the Bank Procedure for Additional Financing for Investment Project Financing applying the World Bank Safeguards Policies (OPS5.03-PROC.231) as the sole purpose of the AF is to address the financing gap in the ongoing contracts of DHP-I. No new or material changes on the environmental and social impacts are expected

² The recent optimization by WAPDA and its engineers indicates that 5,400 MW is the optimal size for the full DHP. WAPDA will decide on increasing capacity of the DHP during DHP Stage II.

³ The IDA guarantee support was approved under P150756 and G-2240 as part of DHP-I (P121507).



because of the AF, other than those reflected in the original Environmental and Social Impact Assessment (ESIA). In any case, in preparation for this AF, the Bank ensured that Stakeholder Engagement (ESS10), Occupational Health and Safety (OHS), and Labor and Working Conditions (ESS2) have been covered as if the Environmental and Social Framework (ESF) was being applied.

Country Context

Poverty reduction has slowed amid recent shocks, while growth has remained volatile and slow. Pakistan made significant progress towards reducing poverty between 2001 and 2018 with the expansion of off-farm economic opportunities and increased inflow of remittances. However, rapid poverty reduction has not fully translated into improved socio-economic conditions, as human capital outcomes have remained poor, with high levels of child stunting at 38 percent and learning poverty at 78 percent. Critical constraints, including persistent fiscal and current account deficit, protectionist trade policies, unproductive agriculture, a difficult business environment, a heavy state presence in the economy, and recurrent losses in the energy sector, have led to slow and volatile growth. Progress with poverty reduction has recently slowed amid macroeconomic instability, the COVID-19 pandemic, and the 2022 catastrophic floods. The estimated lower-middle income poverty rate is estimated at 39.4 percent (US\$3.65/day 2017 purchasing power parity) for 2023, only slightly below the poverty rate of 40 percent in 2018, with 3 million more Pakistanis having fallen into poverty since then.

Pakistan experienced heavy monsoon rains in 2022 leading to catastrophic and unprecedented flooding with enormous human and economic impacts. Roughly 33 million people were impacted, and many permanently displaced. More than 13,000 kilometers (km) of roads were destroyed, 2.2 million houses damaged, around 3.8 million hectares (ha) of crops were flooded, and an estimated 1.2 million livestock were killed. Limited access to input and output markets and temporary disruptions to supply chains subsequently drove up food prices and added to existing price pressures resulting from reduced agricultural yields and the global rise of food prices. The government's Post-Disaster Needs Assessment^[1] estimated that the need for rehabilitation and reconstruction is at US\$16.3 billion.

While there has been recent progress towards macroeconomic stabilization, risks remain high and faster growth will require substantial reform. Real gross domestic product (GDP) growth contracted by 0.2 percent y-o-y in fiscal year (FY) 23, after growing by 6.2 percent in FY22 and 5.8 percent in FY21. Accumulated economic imbalances, including high fiscal deficits and increasing debt, depleted Pakistan's buffers resulting in high vulnerability to catastrophic floods, increasing world commodity prices, and tight global financing conditions. Repeated delays in implementing the International Monetary Fund (IMF) Extended Fund Facility (EFF) program and the associated decline in external financing inflows saw foreign reserves fall to critically low levels, amid high inflation and sharp depreciation. Following the expiry of the incomplete EFF program, a nine-month Stand-By Arrangement (SBA) was approved by the IMF, with staff level agreement reached on its final review in March 2024. Under the SBA, exchange rate flexibility was restored, import controls were eased with some recovery in foreign exchange reserves, and new measures were introduced to contain the budgeted FY24 deficit. Nonetheless, risks remain high. Short-term stability depends on remaining on track with the SBA, continued fiscal restraint, and new external

^[1] Government of Pakistan. 2022. *Pakistan Floods 2022 Post-Disaster Needs Assessment*. Ministry of Planning Development & Special Initiatives.



financing inflows. Robust economic recovery over the medium term will require the steadfast implementation of much broader fiscal and economic reforms.

Pakistan’s energy sector suffers from multiple challenges in achieving the Sustainable Development Goal of affordable, reliable, sustainable, and modern energy for all (SDG7). Key challenges are: (i) high cost of electricity generation driven by high country risk premium for investments, over-dependence on fossil fuels, and fixed capacity payments; (ii) growing fiscal deficits due to energy prices that do not reflect costs, misaligned subsidies, and the poor performance and inefficiencies of the electricity and gas distribution companies; (iii) electricity and gas supply interruptions that stem from electricity transmission bottlenecks, aging equipment, and managed load-shedding of electricity and gas for commercial reasons; and (iv) persistent gaps in energy access, with significant rural-urban and regional disparities.

These structural issues, together with poor planning, have resulted in lack of reliability of electricity and gas supply, as well as in the accumulation of large financial deficits of the sector, referred to as “circular debt”.⁴ Pakistan has the highest level of energy subsidies in South Asia, accounting for 2.6 percent of the country’s GDP in 2020, two-thirds of which were for electricity consumption, and the rest for natural gas. The notified tariff continues to be below cost recovery level, and 62 percent of residential consumers as well as all agriculture consumers are subsidized.⁵ While tariffs don’t cover costs, the state-owned electricity and gas distribution companies suffer from operational and technical losses. The result is that revenue collection does not cover the cost of energy supply.

The circular debt has continued to accumulate, especially in the last few years: at the end of June 2023 it stood at US\$8.3 billion (2.2% of GDP) in the electricity sector and US\$6.3 billion in the gas sector (1.7% of GDP),⁶ creating barriers to future investment. The situation has been exacerbated by the addition in the last decade of large coal and imported gas power plants with “take-or-pay” contracts that have increased capacity payments by 50 percent and increased the country’s exposure to international fossil fuel price volatility. The impact of persistent circular debt is a lack of investment in the gas and power sectors, the inability of both sectors to operate at full capacity due to fuel shortages, and the difficulty of attracting investors to support future sector needs.

To address the high cost of electricity generation and inhibit the sector’s circular debt build-up, the Government of Pakistan (GoP) has pledged to increase the share of hydropower and other renewable energy. The GoP has adopted the Indicative Generation Capacity Expansion Plan (IGCEP), which aims to reverse the current dependence on fossil fuel and provide up to 60 percent electricity from renewable energy by 2031. DHP-I is part of IGCEP, is well aligned with the government’s National Electricity Policy of 2021, and is a priority project for the GoP. The current average cost of electricity generation in Pakistan is US Cents 8.5/kilowatt hour (kWh) (2023), which is driven up by the average cost of thermal generation of over US Cents 10/kWh. As fully completed DHP will generate around 15 percent of the electricity supplied (in 2022) at an expected US Cents 3/kwh, it will lower the average cost of generation in the country, making it easier for the GoP to meet cost recovery and move the sector towards financial viability.

⁴ The circularity comes from arrears getting passed from one public entity of the sector to the next. In the power sector the deficits cascade from the distribution sector to the public central power purchaser, and then to the power producers and fuel suppliers who hold large claims.

⁵ It should be noted that in 2020, more than 90 percent of residential consumers were subsidized—tariff reforms allowed to better target subsidies even if the coverage remains too high.

⁶ PKR 2,374 billion in the electricity sector and PKR 1,800 billion in the gas sector (exchange rate: US\$1 = PKR 285).



DHP-I is a priority project of GoP and will benefit the power sector. Besides the IGCEP, the Project is well-aligned with the government’s National Electricity Policy of 2021 (NEP21). It will improve system efficiency, as well as the sector financial viability and environmental sustainability. DHP will decrease the cost of electricity in the country and help in reducing the circular debt. As DHP will generate around 15 percent of the electricity supplied (in 2022) at an expected US Cents 3/kwh, it will lower the average cost of generation in the country. That will make it easier for GoP to meet cost recovery and reach sector financial viability.

The proposed AF contributes to the Results Area 1: Energy under the Country Partnership Strategy (CPS). The Project contributes to *Outcome 1.1: Reduced Load Shedding*. The CPS recognizes that the sector’s circular debt contributes to load-shedding in the country. DHP-I will supply 12,225 GWh of electricity to reduce load-shedding. The Project also contributes to *Outcome 1.2: Reduced Cost of Electricity Production*. As mentioned above, the cost of electricity from DHP-I is significantly lower than average cost of generation in Pakistan.

C. Proposed Development Objective(s)

Original PDO

The overall project development objective is to facilitate the expansion of electricity supply of hydropower in Pakistan. The Project would also improve access to socio-economic services for local communities in the project area and build WAPDA’s capacity to prepare future hydropower projects. This would be achieved by installing a 2,160 MW hydropower plant on the main Indus River, which can be expanded to 4,320 MW in future at very low cost. The Project is a “high-risk-high reward” operation aimed at providing low cost non-carbon renewable energy.

Current PDO

The PDO of the Project remains unchanged and is the same as stated above.

Key Results

The PDO-level results indicator for DHP-I has been changed to incorporate indicators from the World Bank Group Corporate Scorecard FY24-30. The PDO-level results indicators are as follows:

- a. GW of Renewable Energy Capacity Enabled (Gigawatt) | Baseline: 0; End Target: 2.160 GW
- b. Number of additional people in the project area with improved socio-economic services (Number) | Baseline: 0; End Target: 20,000
- c. Number of large hydropower project on the Indus River prepared by WAPDA (Number) | Baseline: 0; End Target: 1

D. Project Description

The AF is designed to ensure no disruptions in works that are on the critical path for commissioning DHP-I in 2028 and will support the hydropower component of DHP-I. All activities under Components A, B, C, E, F, and G of the Project, i.e., hydropower component⁷, will be financed by the proposed AF.

- a. **Component A: Construction of the Main Hydraulic Structure on the Indus River (original cost US\$1,479.7 million, updated cost US\$1,485.3 million).** This component consists of the civil works for the main dam structure on the Indus River to raise the water level and thus create energy for running

⁷ Component D comprises the 765kV line for evacuation of the generated electricity implemented by NTDC and is not supported by this AF. The US\$700 IBRD that was approved in March 2020 is covering this component.



the power generating turbines and generators. A spillway would be built in the main hydraulic structure to pass the floods. Nine low level outlets will be built in the main structure and flushing tunnels will be built to flush the sediment coming from upstream, which may be deposited in the reservoir. The main dam structure would be constructed with roller compacted concrete (RCC).

- b. **Component B: Power Generation Facilities (original cost US\$1,397.8 million, updated cost US\$1,249.4 million).** Civil works for the power generation facilities, including head race tunnels, powerhouse, tailrace tunnels, and associated infrastructure such as gates and other control structures are in Component B. Turbines, generators, and electro-mechanical equipment are also in this Component. Under DHP-I, waterways and powerhouse would be completed and equipment would be installed for a generation capacity of 2,160 MW—six units of 360 MW each.
- c. **Component C: Preparatory Works (original cost US\$344.8 million, updated cost US\$797.4 million).** This comprises access roads, KKH relocation, construction of 132 kilovolt (kV) TL from Dubair to Dasu for construction power, project colony, offices, and on-site housing.
- d. **Component E: Implementation of Social and Environmental Management Plans, and Glacial, Sediment River Monitoring (original cost US\$503.9 million, updated cost US\$361.4 million).** SRMP to address: (i) compensation for lost assets, resettlement; (ii) livelihood restoration and public health for the population affected by the Project infrastructure; and (iii) programs on gender and local area development in Kohistan. EMAP to address all construction-related environmental issues, indirect and cumulative impacts, development and implementation of programs for ecological conservation, fisheries and forestry management, and costs associated with monitoring and supervision of EMAP implementation. Component E also includes flood warning system, watershed, sediment, and river monitoring.
- e. **Component F: Construction Supervision, Monitoring and Evaluation of the Project Impacts and Social and Environmental Management Plans (original cost US\$99.1 million, updated cost US\$224.7 million).** Construction supervision and support for Project implementation. It will cover procurement, contract administration, quality control, certification of payments, FM, preparation of any additional designs, and bidding documents. Component F also finances M&E of the Project impacts and implementation of SRMP and EMAP.
- f. **Component G: Project Management Support, Capacity Building of WAPDA, Technical Assistance and Training (original cost US\$72.4 million, updated cost US\$31.2 million).** Support for operation of the Project Management Unit, capacity building, incremental staff salaries, operational cost, and audits. Component G also includes institutional capacity building of WAPDA, IPOE, technical assistance, future project preparation, and strategic studies.

E. Implementation

Institutional and Implementation Arrangements

WAPDA will continue to be the implementing agency for the AF under the same arrangements and responsibilities. Most of the AF funds will be used to meet the foreign exchange cost of the for ongoing contracts. For project supervision and monitoring, the WAPDA is supported by the design and supervision



consultants, who are already working and on the site. There would not be any significant change in the implementation arrangements.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

Dasu Hydropower Project (DHP) is a run-of-river project on the Indus River about 240 kilometer (km) upstream from the Tarbela Dam, 8 km upstream of the Dasu Town (capital of Kohistan, District of Khyber Pakhtunkhwa (KP) Province), and 350 km from Islamabad. At the DHP site, the Indus River flows in a deep and narrow valley (750 - 800 meters above sea level (m asl)). The Indus River presents important biota with longitudinal connectivity along its main stem. The Project is accessible by Karakorum Highway (KKH), which is the only road between Islamabad, northern parts of Pakistan, and China. The Project area is below 1500 m asl and consists of steep and unstable slopes full of rubble and rocks with low scrubs and stunted trees. It does not have any forests. There are no protected areas, forests and nature reserves in the Project area except Kaigah Nullah Game Reserve. This Reserve is a 5,000 hectare (ha) Community Conservation Area for Markhor sheep (*Capra falconeri falconeri*). Dasu Transmission Line (DTL) is along the Indus River and avoids environmentally sensitive areas. DTL corridor crosses international migratory birds route No.7 near Tarbela. The Project will have minimal impact on these critical habitats. There are important cultural or archaeological resources in the vicinity of the Project. The possibility of “chance finds” is high. Kohistan District is sparsely populated with only 63 persons per square km and has a very low Human Development Index (HDI). It has a diverse population along ethnic, religious and tribal lines. Maliks (tribal leaders), Ulemas (religious leaders) and tribal elders are members of the local jirga, the main forum for collective decision-making. Kohistan has a highly patriarchal society and polygamy is believed to be widespread. Main sources of livelihood are livestock, agriculture, and forest products. Seasonal migration is very common up and down the mountain slopes between the river valley and high elevation areas. This is mainly for climate and economic reasons. In winter, people live near the river in their more permanent “winter residences” below 1,500 m asl. Many farmers build “summer residences” and cultivate land at higher altitude (2,000- 2,500 m asl). The pastoralists herd their livestock in summer at even higher altitudes (2,500- 3,000 m asl) and come down with their livestock in winter.

G. Environmental and Social Safeguards Specialists on the Team

Imran-ul Haq, Social Specialist

Ahmad Imran Aslam, Environmental Specialist



SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	
Performance Standards for Private Sector Activities OP/BP 4.03	No	
Natural Habitats OP/BP 4.04	Yes	
Forests OP/BP 4.36	Yes	
Pest Management OP 4.09	No	
Physical Cultural Resources OP/BP 4.11	Yes	
Indigenous Peoples OP/BP 4.10	No	
Involuntary Resettlement OP/BP 4.12	Yes	
Safety of Dams OP/BP 4.37	Yes	
Projects on International Waterways OP/BP 7.50	Yes	
Projects in Disputed Areas OP/BP 7.60	No	

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:

Environmental Impacts:

Adequate mitigation measures are in place to manage the identified environmental impacts. The impacts and concerns witnessed during the construction stage are related to: ambient air quality, especially dust population; limited work space; wastewater discharge; haulage and disposal of spoil; solid waste management; traffic management; and noise and vibrations.

Effectiveness and consistent implementation of Occupational Health and Safety (OHS) Management Plans (OHSMP) is a key issue. The Project faces significant OHS risks due to a combination of factors, including high geological risks, the possibility of low competency of contractors’ staff, as well as possible unwillingness of contractors to comply with OHS procedures and processes. During construction, major risks and hazards are associated with ventilation in tunnels and confined spaces, high silica dust concentrations, work at heights, scaffoldings, safe driving as well as human-machine interface, interaction with community and visitors at active work sites. The Supervision Engineers have now established a robust system which aims to proactively prevent, capture and remedy unsafe practices and actions in the shortest possible time. This has helped to reduce OHS related incidents. Nonetheless, some lapses have occurred with serious consequences, including fatalities. Root Cause Analysis and corrective actions have been taken to reduce the risk of recurrence.



Implementation of the Biodiversity Management Plans (including Physical Cultural Resources (PCR) Management Plan) has been slow, mainly due to delay in reaching an agreement with the lines departments on institutional arrangements and funds flow. Conservation of Shital rock carvings has been delayed by land dispute. First tree plantation activity as proposed under the Forestry Management Plan is already underway and will be completed by June 2024. Furthermore, the client has agreed on arrangements for renovation of an ancient mosque by the Khyber Pakhtunkhwa Department of Archeology as proposed under the PCR Management Plan and has started.

The recommended environmental flow releases (e-flows) will be maintained throughout the Project lifecycle. Major potential issues that have been identified for the operational stage include: (i) impacts on downstream water uses due to first-time filling of the reservoir and its timing; (ii) negligible flows in the river reach between the dam and the outflow from the power house (tail-race); (iii) loss of river connectivity and changes in river ecology in the reservoir area and its impact on fisheries; and, (iv) possible impact on downstream ecosystems during peaking and sediment releases. In addition, there are likely to be some induced impacts on the forest resources at the higher altitudes caused by the resettlement of project-affected people and by in-migration of a large number of workers. These impacts would be mitigated by: (i) managing timings of impounding to high-flow seasons as well as extending timings to avoid complete water depletion; (ii) Implementing a forest management plan that addresses the potential induced impacts, through extensive plantation, afforestation and reforestation activities; (iii) adaptive management of changes in aquatic biodiversity and downstream ecosystem; (iv) catch and release of fish, to be implemented if genetic studies show impacts of inbreeding in the main river and its tributaries.

There has been no change in the power evacuation transmission line design or its route, which consists of a 255 km long, 765 kilo-Volt (kV) High Voltage Alternating Current (HVAC) transmission line from DHP-I to the Islamabad West Substation, through a substation at Mansehra. The geography of the TL route (Dasu-Mansehra-Islamabad) is dominated by high mountains, varying in elevation from 1,000 to 3,200 m asl, entailing hazards, such as earthquakes, steep slopes, landslides, river scouring, flooding and avalanches.

The Environmental Management Action Plan and Biodiversity Baseline and Management Plans prepared for the Project are relevant and applicable for the AF. Since the AF of 2020, and in order to cover key aspects of the new World Bank Environmental and Social Frameworks (ESF) framework that were usually not covered under the previous World Bank Safeguards framework, the Project is also implementing the OHS Management Plan (OHSMP), the Emergency Preparedness and Response Plan, and a Traffic Management Plan. The Project is following an adaptive management approach. Consequently, monitoring, mitigation, and management of risks, hazards, and impacts are constantly evolving for better supervision and enforcement.

Social Impacts:

Major adverse impacts under the Project are related to land acquisition and involuntary resettlement for various components of the Project, such as construction of the dam, its ancillary structures, formation of reservoir and relocation of Karakoram Highway (KKH). A total of 5,031 acres of land need to be acquired for the reservoir, relocation of KKH, and other associated ancillary works. Most of the land is barren with minor areas which were used as agricultural lands, consisting of terraced farms, grazing areas, and orchards. A total of 3,189 houses and residential structures, 139 shops, 36 mosques, 11 schools, one basic health unit, and 151 graves are affected. The affected households will either self-relocate or move to the resettlement villages.

There has been an influx of people, who are from other parts of Pakistan, into Kohistan District for construction of the Project. They are construction workers, project management staff, and people seeking business and job opportunities.



The total Project workers employed in early 2024 is around 6,500 including around 3,000 local workers from Kohistan District. This influx of people has increased pressure on the local capacity to provide services as well as on local resources use. This is being managed under Social and Resettlement Management Plan (SRMP) and Dasu Town is benefitting from increased business and economic opportunities. The rise in population and the increased interactions with the local population have led to augmented exposure of the local population to public health risks. This issue is being managed through the implementation of the Public Health Action Plan (PHAP) developed as part of the SRMP. Considering the local social and cultural norms, inappropriate conduct by the Project workers could potentially lead to tensions and conflicts among workers. Construction-related impacts are addressed through implementation of management plans prepared under the SRMP. Code of conducts have been prepared and are being implemented. Contractors obligations have been strengthened to prevent public health risks, including through mandatory screening of project workers. Sexual exploitation and abuse/sexual harassment (SEA/SH) risks are managed by enforcing the contractors obligation to implement the code of conducts and periodic trainings. An assessment was also carried out on downstream livelihood impacts, particularly fisheries. The assessment identified the communities with households who fish in the river. It reveals that there are no professional full-time fishermen along this stretch of the river, fishing is mostly for self-consumption, and fishing activities mostly take place along the tributaries rather than the main stem of the river. The assessment concludes that the Project is unlikely to have major impacts on fishing income downstream of the dam.

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

A Cumulative Impact Assessment (CIA) has also been prepared as part of the Environmental and Social Impact Assessment (ESIA) of the Project; and is being updated to consider latest information. It is considering seven hydropower projects on the Indus cascade totaling more than 10,000 MW. The temporal boundary for the CIA includes remaining construction period of over 3 years and the operational life of the Project, which would be about 40 years. Spatial boundary is from Tarbela to the border with China. Five river ecosystem valued environmental components (VECs), a terrestrial VEC, and four socio-economic VECs are being considered. Existing stressors comprise of indirect pressures (such as catchment erosion and landslides, flooding, and earthquakes) on natural resources (such as water and sand supply). In addition, direct pressures on natural resources include the construction of different access roads, in particular KKH near DHP, and fishing and riverbed mining.

The Project is a major investment in Kohistan District. It has contributed significantly to the socioeconomic development of the local areas. In addition to the social programs that will support the affected populations to improve their livelihoods, both in terms of income generation and residential conditions. Local populations are also benefitting from the overall development of the area, a result of the Project's implementation.

The local area and community development projects have increased the sense of "ownership" of the Project by the Kohistani community at large, with the expectation of enhanced quality of life for the people in the Valley. The recent socio-economic survey (2023) conducted by an independent monitoring and evaluation (M&E) consultant shows that adult literacy has increased by 30 percent since 2012; while schooling has increased by 16 percent for boys and 70 percent for girls. Project-affected households who have been relocated enroll 100 percent of their school-age boys and 98 percent of their school-age girls in schools, compared to 83 percent and 35 percent respectively for other households in the area. Household possessions have increased by 109 percent and pukka houses (permanent and solid houses) have increased by 65 percent. Households with paid employees have increased by 34 percent and the number of skilled workers has increased by 52 percent. The average salary of the Project's local workers is higher by 40 percent than non-project-workers in the area. The average monthly income of households has doubled. With increased awareness, visits to health facilities have increased due to reduced travel costs and improved transport. Gynecological



consultations have substantially increased, when they were almost non-existent in this area before. The survey also shows an increase in food security and higher protein diets.

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

The environmental assessment considered a number of alternatives, which included: (i) without-project alternative; (ii) site selection of main structure and hydraulic and electrical infrastructure; (iii) alternatives for the type of structure: (a) Roller Compacted Concrete structure (RCC), vs. (b) Concrete Faced Rock fill structure, vs. (c) an Earth fill structure; (iv) alternatives for the lay-out of intake and tail race tunnels; (v) alternative sources of construction material; (vi) alternatives for the selection of generating equipment; (vii) alternative construction schedules; and (viii) alternatives for resettlement. The details of alternatives assessed are presented in the EMAP and SRMP.

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.

Environmental Safeguard Issues:

The Project has invested significant resources in hiring staff for environmental safeguards covering all three areas: (i) environmental monitoring and compliance; (ii) biodiversity; and (iii) OHS. Currently, the Project employs 47 people for environmental monitoring and compliance, 4 for biodiversity, and about 100 staff for OHS. The staff capacity has been increased over time to meet the Project requirements. The Project will recruit additional environmental staff, especially biodiversity staff, to implement the biodiversity management plans, which are still in the initial stages.

The Project uses adaptive management for addressing challenges faced during construction. Comprehensive geological investigations were conducted to reassess landslide-prone areas, leading to significant design changes in road sections. This included reconfiguring and realigning roads to avoid unstable areas and integrating tunnels and bridges to strengthen the transportation infrastructure. The Project developed temporary disposal sites and leased private lands in response to spoil disposal challenges. Waste management practices were adapted to include segregation of recyclable materials, recruitment of licensed vendors, and support for local waste collection initiatives. Innovative solutions like diluting wastewater with freshwater and constructing additional sedimentation ponds were implemented for improved water quality management. These adaptive measures demonstrated the Project's commitment to overcoming environmental challenges, ensuring compliance with environmental standards, and maintaining the Project's sustainability.

Safeguard documents prepared during the initial project preparation had limited focus on OHS. Consequently, detailed standardized OHS Management Plans (OHSMPs) were prepared to comply with international standards, as those required under ESS2 (ESF). Furthermore, to streamline and simplify this process, the client developed a standard OHSMP consisting of 4 policies, 20 processes, and 35 Standard Operating Procedures (SOPs). This OHSMP was developed in accordance with the International Tunnelling Association's (ITA) Guidelines for Good OHS Practice in Tunnel Construction, the International Labor Organization's Safety and Health in Building and Civil Engineering code of practice and the World Bank's Environment, Health and Safety (EHS) Guidelines. This OHSMP was then used as a template for the contractors to assist in the development of their own OHSMPs.

The initial biodiversity surveys carried out during the planning stages focused on terrestrial and aquatic ecology, providing basic ecological context. Additional studies were undertaken the first years of implementation by international and national consulting firms spanning several seasons. They covered various ecological aspects



including aquatic and terrestrial ecology, wildlife, avian diversity, forestry, watershed management, and physical cultural resources. The surveys involved extensive fieldwork, consultations, and data analysis to provide a detailed understanding of the project area's biodiversity and cultural resources. These studies resulted in two sets of reports: Baseline Information Reports (BIRs) and Detailed Ecological & Biodiversity Management Plans (DEBMPS). The BIRs provide comprehensive baseline information, while the DEBMPS outline detailed implementation plans.

Key lessons from project implementation are listed below:

1. The Project demonstrated the importance of learning from field experiences to refine strategies and practices, highlighting the need for proactive, collaborative, and flexible environmental and OHS management approaches. The Project experience also highlighted that safeguard documents including EMAP and OHSMPs are living documents which must have provisions and mechanisms to revise them to improve the safeguards for the well-being of all stakeholders.
2. Risk and impacts related to inherent geological risks were not fully comprehended at the time of Project preparation and as a result standard mitigation measures had to be supplemented, including redesign of some civil works.
3. Comprehensive planning requires early and intense coordination of the environmental team with other sectors. It can help save time and resources during Project implementation. Initial road designs underestimated the risks of landslides and had to be subsequently changed, leading to substantial increases in road construction costs. Similarly, wastewater quality issues arose due to inadequate initial designs of settlement ponds. The ponds were designed and constructed without inputs from the environmental team. Likewise, land acquisition was not prioritized for spoil and waste management as proposed in EMAP. This led to inadequate and temporary solutions.
4. It is extremely important to include OHS considerations during the Project planning phase. The initial contracts had limited OHS considerations, and the absence of OHS budgets or resources resulted in insufficient coverage and attention to worker safety in the early stages of the project, which now have been addressed. These challenges underscore the crucial necessity for a robust and proactive approach in integrating OHS considerations early into project planning and execution.
5. The experience highlighted that safety is not merely a compliance requirement but a core value that should permeate all aspects of Project planning and execution. The significance of clear and comprehensive OHS policies along with robust communication strategies were recognized, and these elements should be incorporated into the planning documents. Consistent updates and initiatives for training and capacity-building were crucial to ensure the workforce are well informed of OHS matters, and have the capacity to manage them.
6. Implementation of biodiversity management plans was impacted by numerous factors. Initial challenges faced in construction oriented the focus of the client and the World Bank on mitigating OHS risks and managing environmental impacts of the activities that were on a critical path. Reliance on line departments for implementation, as envisaged in the initial plans, turned out to be impractical. The COVID-19 pandemic as well as high staff turnover and the lack of specialized biodiversity expertise in the PMU also contributed to delays in implementation. All this points to the necessity of comprehensive human resource planning early in the project, including the recruitment of specialized staff.

The Project will continue to enhance its focus on geotechnical assessments and continuous monitoring of geological risks. It will continue to identify improved solutions for spoil and waste management as well as dust pollution control. Efforts will be made to ensure regulatory compliance with discharge parameters for wastewater. Environmental staffing will be strengthened to ensure the effective implementation of the biodiversity management plans. The lessons learned and the adaptive strategies implemented in DHP are expected to be replicated in future WAPDA projects, so that environmentally sustainable practices and effective management of potential environmental impacts



will be applied in the other project.

The OHS team will continue to assign clear accountability and improve the effectiveness of hazard control measures. It will work to ensure strong commitment of the Project management teams in fostering a culture of safety. The OHS team will continue to focus on pre-tasks risk assessments for any new work. The Project will continue to improve effective and consistent implementation of the OHSMPs by the contractors. The Project will continue to improve the worker's well-being processes. Tunnel air quality and ventilation systems, electrical systems, isolation processes (also known as logout/tagout), work at heights, correct recovery equipment and emergency evacuations, are areas that the Project will continue to focus on and improve. Communication and work observation processes will also be further improved.

Environmental flows and biodiversity will be monitored under a biodiversity monitoring program. Biodiversity management plans are also aligned with the revised cumulative impact assessment. VECs identified include natural flow regimes, migratory fish (snow trout), terrestrial habitats and hunting as priority VECs.

Social Safeguard Issues:

To address the adverse impacts and maximize Project benefits, WAPDA developed a series of interventions on the basis of field surveys and extensive consultations with local communities, with the aim to restore and improve livelihoods of the affected populations, and support local socioeconomic development. These interventions are packaged into the SRMP which is being implemented since the onset of the Project. As the additional financing covers only the financing gap, it does not include any new activities or changes in the geographical Project scope, the existing SRMP (reviewed, and cleared by the World Bank) remains applicable. No new safeguard instruments have been prepared for this AF. Also, the adaptive management strategies adopted to overcome implementation challenges have all been documented in the Mission Notes, Aide Memoires and SRMP Due Diligence Report.

After delays during the initial years of the Project, implementation of SRMP has later gained momentum. It currently enjoys well-established institutional arrangements on the ground and is assessed to be well implemented. Deploying and maintaining a strong Social and Resettlement (S&R) team is one of the key reasons of such progress. There are currently about 150 S&R staff deployed—mainly working in the WAPDA Project Management Unit (PMU), in the Supervision Engineer's team, and in the District Administration. Project benefit sharing through Local Area Development Plan (LADP) and Public Health Action Plan (PHAP) were initially designed and supervised by the Supervision Engineer (Dasu Hydropower Consultant, DHC). Currently, a newly hired consulting firm provides dedicated support for design and implementation of the LADP and the PHAP. The independent M&E consulting firm also has the necessary social development expertise, which is led by an S&R team lead with international experience.

Land acquisition for the main dam, reservoir, KKH, Right Bank Access Road (RAR) and other preparatory works has been completed. About 5,031 acres of land has been acquired following key decisions of the Executive Committee of the National Economic Council (ECNEC) to revise compensation rates in 2019. Almost all undisputed compensation has been disbursed to the affected people. The Project has disbursed US\$185 million-equivalent to the affected people of the Project area for compensation for land, trees, crops, structures, and other assets, as well as for resettlement assistance.

The resettlement strategy in DHP includes both the relocation to resettlement sites as well as self-managed relocation. Constructability of Resettlement Villages (RVs) in higher altitude and local competition on the use of natural resources that were needed for the development of the resettlement site, proved to be more challenging than



expected. However, resettlement works have also been accelerated with two sites handed over to affectees. There are 3,189 Households that will be affected, out of which 219 have opted to move to the resettlement sites, while the rest have chosen to self-relocate. For relocation to resettlement sites, seven sites are currently being constructed : Left Bank Resettlement Village (LBRV)-11, LBRV-12 and Dasu-RV. After resolving the key issue of water supply, two sites under LBRV-11 have been completed and transfer to affectees has started. LBRV-12 sites are also close to completion. Dasu RV's overall progress is currently at 70 percent and has suffered delays. Sites are nevertheless expected to be completed by the end of 2024. Relocation of 11 schools and basic health units in reservoir area is also progressing well, with sites for 7 schools already identified.

The SMR package was enhanced to overcome the challenges faced in the development of the resettlement sites, taking in account that the vast majority of the affected communities chose to self-relocate. The Enhanced Self-Managed Relocation (ESMR) faced challenges but has made good progress during the last six months. The ESMR is offered to affected households who have opted for self-relocate. About 2,970 affected households have opted for self-relocation. Out of these, about 1,529 households have received ESMR and relocated to higher altitudes, or down closer to Mansehra and Abbottabad. ESMR payments have been disbursed to all affected households in the main dam area and they have already self-relocated. The project faced challenges with families sub-dividing into multiple households in order to claim additional ESMR packages. This is being managed by effectively implementing the eligibility criteria for self-relocation.

The Project currently employs more than 3,000 locals from the Kohistan District and the most common demand of its communities is to increase local hires. The Project tries to accommodate most of these requests to promote local employment, except when technical, specialized workforce not available locally is needed. This leads to frequent instances of unrest and disruption of works. This challenge is being effectively managed through continuous engagement of the District Administration, WAPDA and higher level of the Government, who engage local communities through jirgas and meetings. To prevent potential risks from labor influx, proactive measures have been taken by strengthening the contractors' obligations and capacity to address HIV/AIDS, public health, and safety risks. All contractors have prepared and are implementing Code of Conducts (CoCs), and training/sensitization on gender awareness is provided to contractors and security personnel.

Implementation of benefit sharing through the LADP and the PHAP has accelerated during the past two years. The area is transforming, and social-economic conditions are improving. The Project's multipliers impact is much higher than usual for such projects. Implementing the LADP and the PHAP initially took longer than expected, as it was difficult to reach agreements with local communities on the schemes and interventions. To date, a total of 69 community development projects have been identified in consultation with concerned communities and the local administration. These mainly include roads, irrigation schemes, schools, medical facilities, mosques, bridges, solar systems, procurement of furniture, computers, and developing science laboratories and libraries. Seven of these schemes are under construction, twenty have already been completed and several are at different stages of design and bidding. Soft interventions have also played a vital role in getting community support. These include scholarships as well as free school pick and drop facilities, leading to an increase in school enrolments. Several health camps have also been deployed in the Project area, particularly benefiting women and children.

Implementation of the Gender Action Plan (GAP) has progressed very well during the past three years, with strong results. Kohistan has a very sensitive and conservative gender context, with limited interactions between women and men from different households. The GAP strategies were designed keeping this sensitivity in mind. The interventions include:

- (a) Awareness and sensitization with community institutions and community leaders. GAP designed strategies to



use and work with heads of households or Maliks/Ulemas as reach channels to develop the program. WAPDA worked closely with local Maliks/Ulemas and conducted gender awareness sessions highlighting the importance of women's health and education, as well as explaining how women in Dasu can benefit from the Project. Gender sensitization workshops for Dasu Project staff, contractors, and officials of the local District administration have also been effective. These activities engage local and public institutions such as jirgas and schools.

(b) Awareness-raising sessions and distribution of pamphlets and brochures on Health and Hygiene are being conducted. Implementation of the School Health and Hygiene Program that was designed in the early stages of Project implementation has progressed very well. Hygiene kits were distributed among school students. Rural Health Centers are also being improved. More than 8,000 women and children have benefitted from 10 medical camps rolled out by WAPDA in the area.

(c) Literacy classes for women are offered. This led to demand for such classes in other areas. WAPDA also started a scholarship program for girls to incentivize girl education.

(d) The Project invested in the promotion of women's livelihoods. Thirty-five women have started a 2-year training to become Lady Health Visitors (LHVs) in the local area, to promote healthcare and hygiene practices and eventually help women access prenatal, postnatal and delivery services at the local level. The GAP also facilitates women's participation in local jobs in different institutions (including as a gender specialist in the PMU, and two in the district police department).

(e) Two Women Resource Centers have been established for training on home-based income generation and improving livelihoods. Skill development courses for women were started after intensive community engagement and mobilization. A total of 24 participants (women and girls) have completed their two months course and learned various skills including drafting and pattern making, dress designing, embroidery, making handbags, ribbon work and frame making etc. A First women's Community Learning Center for training on skills like stitching, tailoring, and embroidery was successfully piloted, and more are planned based on needs assessment and community demand.

Implementation of the SRMP has been ongoing for about 10 years and there are important lessons learned:

1. A fair and rightful compensation package for lands and other assets acquired has proven to be vital for resolving bottlenecks. The Project negotiated rates for land and other assets with the affected communities via jirga meetings with DC Upper Kohistan. Further, a more equitable approach was adopted through category-wise rates for commercial, residential, cultivated, un-cultivated, and barren lands by locations (i.e., urban, semi-urban, and rural). The rates were approved by ECNEC in November 2015. These were later increased by 40 percent in 2019, in response to strong demands by affected populations.

2. Dynamic and adaptive management has played a key role in Project implementation. It was important to offer a resettlement option in higher altitude for the affected households in their own valleys to minimize disruption and support their traditional terrace cultivation and livestock. Yet, constructability of RVs in these locations and increased competition on the use of local natural resources for resettlement proved to be more challenging than expected. Since the KKH on the left bank was also being relocated at higher altitude, the affected and relocated communities still had access to KKH as they did in the past, so the affected people remained within their vicinity with limited disruption. The sites were selected by the affected communities on their own land, which is located about 1200 meters away, 800 to 900 m asl. The access to new resettlement sites was very difficult with no access roads for heavy trucks and machineries. Further, many resettlement sites' access were dependent on relocation of the KKH-01, which is still in progress. The delays were largely caused by lack of access to sites, coupled with conflicts over land and water sources. The RAP also provided the alternative option of self-relocation with additional assistance beyond the compensation.

3. Local area/community development and public health services as benefit-sharing programs beyond the Project area



have a big impact. To share the benefits beyond the directly affected communities, the Project has taken a comprehensive local area/community development approach, including rural roads, health services, streetlights, water supply, sewerage, and sanitation etc.. Several soft interventions like scholarships, trainings have also played a key role. The purpose has been to enhance the quality of life of people in the project area and beyond.

4. Implementation of the Gender Action Plan took time but has proven to be successful. The response of the local community, particularly from the Ulemas/Maliks, has been very positive to initiatives under GAP as described earlier.

The SRMP progress is now on a good track, despite initial challenges. It is important to maintain the present momentum and address the remaining implementation tasks including:

- (a) The DHPP Team should focus on the remaining EMSR cases, complete the RVs and relocate families in their designated resettlement villages. Handing over of two completed RVs have already commenced and remaining sites should also be handed over soon to the designated communities for relocation and resettlement.
- (b) The remaining 5 RV sites must be ready with appropriate facilities by the end of 2024.
- (c) For those affected households who opted for self-relocation, the Project Team should monitor all affectees moving on SMR and provide periodic reports, including any emerging issues in the self-resettlement processes. Monitoring of SMR cases are currently being conducted; however, a GIS-based system should be introduced to review the progress and manage the relocation properly.
- (d) Though local area/community development programs have accelerated, they are still behind schedule. The implementation must accelerate now with a target to finish all community development programs by 2025-2026.

The National Transmission and Despatch Company (NTDC) is responsible for the planning and construction of the Dasu Transmission Line (DTL) and Mansehra Grid Station (MGS). NTDC has prepared an ESIA including ESMPs and RAPs for the DTL, as well as an MGS to mitigate both the indirect social impacts (labor influx, gender, public health and construction related impacts) and the direct impacts (land taking, resettlement and livelihood impacts). ESMP and RAPs are under implementation.

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

The stakeholder analysis conducted as part of the Project planning process identified the primary and secondary stakeholders, analyzed their respective views, expectations, roles and responsibilities regarding the DHP. The stakeholder analysis was continuously updated during the Project implementation. Local consultations and jirga meetings were conducted during the planning stage and continue during implementation. Relevant government agencies including ministries, various departments and civil administration are continuously being closely consulted.

Project design is based on strong citizen and community engagement, which continues during implementation. The citizen and stakeholder engagement for the original DHP-I is continuing through the implementation of the Public Consultation and Participation Plan and the communication strategy. Citizen engagement have several mechanisms: (a) the consultation process for the ESIA and RAPs, (b) the establishment of project-level grievance redress mechanisms (GRMs) to improve engagement with affected persons and communities, (3) consultations to design and implement the LADP and the PHAP, and, (4) continuous community consultations to improve implementation and resolve challenges.

Extensive consultations have been carried out with communities during design and implementation and the GRM has



been improved to align with existing local practices. More than 5,000 consultations have been carried out during the Project design and implementation (on top of the informal community engagements happening on daily basis at different levels). An independent chair has been hired to head the Grievance Redressal Committee (GRC).

WAPDA’s communications team manages all Project communication with internal and external stakeholders. The Project is using its communication strategy, which comprises of social media and other channels. Its website is updated regularly and a digital display screen has been installed in the town of Dasu for communication. WAPDA carries a media analysis occasionally to assess perceptions in the media and to update the communications strategy accordingly.

B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)

Environmental Assessment/Audit/Management Plan/Other		
Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors

"In country" Disclosure

Resettlement Action Plan/Framework/Policy Process	
Date of receipt by the Bank	Date of submission for disclosure

"In country" Disclosure

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)



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