



# Program Information Document (PID)

Concept Stage | Date Prepared/Updated: 16-Jul-2020 | Report No: PIDC230223

**BASIC INFORMATION****A. Basic Program Data**

Country Pakistan	Project ID P174484	Parent Project ID (if any)	Program Name Pakistan Crisis-Resilient Social Protection (CRISP)
Region SOUTH ASIA	Estimated Appraisal Date 06-Oct-2020	Estimated Board Date 28-Dec-2020	Does this operation have an IPF component? Yes
Financing Instrument Program-for-Results Financing	Borrower(s) The Islamic Republic of Pakistan	Implementing Agency Benazir Income Support Program, Poverty and Social Safety Nets Division	Practice Area (Lead) Social Protection & Jobs

**Proposed Program Development Objective(s)**

To support positive disruptions and advances in the social protection system to make it more adaptive and to build crisis-resilience among poor and vulnerable households.

**COST & FINANCING****SUMMARY (USD Millions)**

<b>Government program Cost</b>	600.00
<b>Total Operation Cost</b>	300.00
Total Program Cost	295.00
IPF Component	5.00
<b>Total Financing</b>	300.00
<b>Financing Gap</b>	0.00

**FINANCING (USD Millions)**

<b>Total World Bank Group Financing</b>	300.00
World Bank Lending	300.00



Concept Review Decision

The review did authorize the preparation to continue

## B. Introduction and Context

### Country Context

- 1. As a consequence of COVID-19 pandemic and related restriction measures, Pakistan's economy has faced severe economic shocks.** As of July 10, 2020, Pakistan had 243,600 confirmed COVID-19 cases and over 5,000 deaths. For the first time since 1979, the South Asia region is expected to experience a reduction in per capita income, with GDP per capita projected to decline by 3.8%.<sup>1</sup> Prior to the onset of COVID-19 in Pakistan, the country was already facing a slow-down in growth due to the structural adjustment policies implemented to address macroeconomic imbalances. Prior to COVID-19 Pakistan had made huge strides in poverty reduction, although human development indicators lag behind.
- 2. Pakistan is the most successful South Asian country in transforming GDP growth into poverty reduction.** Between 2001 and 2015, more than 32 million Pakistanis escaped poverty.<sup>2</sup> Despite this impressive achievement, poverty reduction was geographically uneven, and poverty remains concentrated in rural areas. Human capital accumulation prior to the crisis was already low, with Pakistan ranking 134 out of 157 countries in the World Bank's Human Capital Index.<sup>3</sup> Malnutrition and learning poverty emerge as two key aspects of the human capital challenge in Pakistan, with socioeconomic determinants playing a key role. Stunting rates in Pakistan for children under-5 are high at 37.6 percent. The Bank's 'Learning Poverty' initiative finds that learning poverty in Pakistan is 16.3 percentage points worse than the South Asian average and 19.5 percentage points worse than the average for lower middle-income countries.<sup>4</sup>
- 3. The socioeconomic impacts of COVID-19 risk reversing recent gains, depleting human capital accumulation, and heightening vulnerability for workers.** The pandemic's disruptions, including the mobility restrictions, reduced demand, and a fall in remittances, are expected to have widespread socioeconomic impacts in Pakistan. The crisis is expected to lead to a sizeable increase in poverty, reversing the sustained reduction observed over the past 20 years. Urban areas are especially vulnerable due to the higher prevalence of service sector workers and lower safety net coverage. Data on human capital impacts in Pakistan are not yet available, but a projected 3 million school dropouts are expected due to income shocks and use of negative coping strategies. Beyond the evident supply side issues, deterioration of health indicators is expected due to demand-side issues induced by the crisis.
- 4. Most households rely on informal income sources and lack basic mechanisms to manage risks.** The majority of Pakistan's workforce is engaged in informal work, resulting in a vast segment of the population without access to risk-coping mechanisms, which is likely to deepen the effects of the crisis. The recent expansion of social protection (SP), mainly in the form of wider safety net coverage, is far exceeded by the number of uncovered workers. The household savings rate in Pakistan is also very low, with only 32 percent of the population (15+ years) reporting that they save

<sup>1</sup> World Bank. 2020. *Global Economic Prospects, June 2020*. Washington, DC: World Bank. DOI: 10.1596/978-1-4648-1553-9.

<sup>2</sup> Pakistan Strategic Country Diagnostic 2020.

<sup>3</sup> [https://databank.worldbank.org/data/download/hci/HCI\\_2pager\\_PAK.pdf](https://databank.worldbank.org/data/download/hci/HCI_2pager_PAK.pdf)

<sup>4</sup> WB (2019) Learning Poverty Brief-Pakistan: <http://pubdocs.worldbank.org/en/214101571223451727/SAS-SACPK-PAK-LPBRIEF.pdf>



any money. Inadequate savings combined with inadequate social insurance schemes affect the ability of individuals and households to respond to shocks.

5. **This context calls for a strong SP response that supports post-crisis recovery while introducing the next generation of reforms to enhance the system’s adaptability and households’ resilience to future crises.** The crisis has highlighted the need to expand protection both for the poorest and for the ‘missing middle’ who fall outside existing safety net programs and are excluded from the limited formal systems. This reform requires introducing the next generation of interventions that move beyond social assistance and are able to bring a larger segment of the population under the social protection umbrella; disrupting some of the traditional SP delivery systems to make them more responsive and scalable to crisis situations and cater to a larger number of beneficiaries and programs; and refocusing social assistance programs on safeguarding and rebuilding human capital after the crisis.

#### Sectoral (or multi-sectoral) and Institutional Context of the Program

6. **The strong foundations of Pakistan’s safety net and national identity systems enabled the Government to respond rapidly to the unprecedented scale of the COVID-19 crisis.** In March 2020 the Government launched a large safety net emergency package under the umbrella of Ehsaas, providing a temporary income support to 12 million beneficiaries nationwide. This includes the existing 4.5 million beneficiaries of Kifalat, the unconditional cash transfer program managed by the Benazir Income Support Program (BISP), and an additional 7.5 million beneficiaries. The response was built on a decade of substantive investments in strengthening the national social safety net system and improving on ground delivery. BISP’s flagship social assistance program, Kifalat, provides regular safety nets benefits and relies on a social registry, the National Socio-Economic Registry (NSER), and a biometrically authenticated digital payment system linked to the national identity system. Other federally run safety net programs consist of Waseela-e-Taleem (WeT) a conditional cash transfer (CCT) with conditionalities linked to primary school attendance, and a newly launched nutrition-focused CCT with conditionalities linked to maternal and child health.
7. **COVID-19 laid bare coverage gaps and rigidities in the SP system, that if corrected would enable a more effective crisis response and build resilience to future crises.** These issues had been identified before COVID-19 but were highlighted by the crisis as limiting the extent of the response. First, the system’s ability to accurately assess needs and determine eligibility of potential beneficiaries was limited by: (i) few local-level entry points for the social registry capable of flexibly capturing shocks and other welfare changes, as only one update for targeting data was collected in 2011; (ii) no regular entry-exit process for the safety net programs due to lack of recertification of beneficiaries in a decade; and (iii) unexploited big data and other sources to enhance social registry’s accuracy and effectiveness in times of crisis, as the NSER continued to rely primarily on a proxy-means based approach to determining socioeconomic status. Second, there are important coverage gaps: (iv) the presence of a large ‘missing middle’ – typically informal workers who may not be poor but are highly vulnerable to shocks as they depend on variable incomes and are not covered by existing safety nets or formal social insurance mechanisms; and (v) limited demand-side interventions to address lagging human capital accumulation starting in the early years through schooling and beyond, particularly for girls; and (vi) incomplete coordination with provincial governments and interventions.
8. **The crisis also highlighted the need for a more robust governance structure for the social registry and federal-provincial coordination of all SP-linked interventions.** Constitutionally, the State – comprising the Federal and Provincial Governments and legislatures – has the joint responsibility of upholding the fundamental rights of the citizens (meaningful life, equality and dignity). Narrowing coverage gaps and breaking down the system’s rigidities requires true partnership at all levels beyond what has been seen before COVID-19. The crisis has provided evidence



that this is achievable and necessary to ensure effectiveness during crises. Closer coordination and complementarity of the Federal and Provincial Governments is thus essential for any successful SP-linked reforms.

9. **The Government's strong commitment and recognition of these gaps provide an ideal opportunity to introduce innovations to the SP system to transition it toward greater crisis resilience.** The Government's National Poverty Alleviation Plan, Ehsaas has four pillars, including two focused on safety nets and human capital.<sup>5</sup> Ehsaas also created the Division of Poverty Alleviation and Social Safety (PASS), with close links to the Prime Minister's Office. PASS brings together BISP, the Pakistan Poverty Alleviation Fund (PPAF),<sup>6</sup> the newly created Labor Expert Group, and other important programs under a single oversight.<sup>7</sup> In its 2020 report, the Labor Expert Group recommended expansion of SP beyond existing safety nets to provide broader coverage to informal sector workers, in line with Ehsaas provisions. Under PASS' leadership, Pakistan can address the gaps highlighted by the crisis by expanding the coverage and types of SP interventions and transforming delivery systems to make them truly adaptive and crisis-resilient. The first involves moving into the social-assistance-social-insurance space to build resilience to shocks for the 'missing middle'. The second involves application of new technologies such as big data for assessing needs and determining eligibility, expanded use of biometrics, and setup of on-demand registration mechanisms for social programs using digital platforms.

#### Relationship to CAS/CPF

10. **The proposed operation is extremely well-aligned with the Pakistan CPF 2021-2025 and supports several focus areas of the CPF.**<sup>8</sup> The operation is strongly embedded in the 'ABC-D' framework of 'Accumulate, Build, Consolidate – Disrupt' and the positive disruption agenda set forth by the CPF. The program supports the 'ABC' framework of accumulation of capital, building resilient and responsive institutions, and consolidating gains from poverty reduction. The disruption agenda takes forward transformative innovations. Moving to a more crisis resilient SP system will require pushing the SP system to new frontiers (disrupt) while consolidating recent gains to cope with current and future crises. The proposed project caters to the consolidation agenda by advancing the existing safety nets and delivery systems to ensure the poorest households are protected and to safeguard human capital accumulation. The operation supports the 'disrupt' agenda by supporting some of its key components including utilizing digital solutions, addressing informality and enhancing inclusion, especially for women.
11. **The program specifically supports four key objectives of the CPF.** The program most strongly supports Objective 9 (Increasing resilience of the poor to shocks) by introducing hybrid social-assistance social-insurance mechanisms to extend coverage to the 'missing middle' prone to effects of the COVID-19 crisis but lack recourse to safety nets or formal social insurance. The expansion of human capital linked safety nets and transformation to adaptive safety nets also supports the objective by building more shock-responsive safety nets. The program also directly supports Objective 4 (Enhancing human capital especially for girls). The program supports two CCT programs, both aimed at safeguard human capital from the first 1000 days through primary schooling. The CCT linked to schooling includes additional components to promote enrollment and attendance of girls. Under Objective 8 (Improving service delivery through digitization) it supports the digital payments pathways and the strengthening of the NSER and data exchange platforms. The program also supports Objective 11 (Build rural households' resilience) by supporting safety nets and hybrid social assistance-social insurance (SA-SI) mechanisms.

<sup>5</sup> Ehsaas consists of 115 policy actions. The other two pillars are focused on addressing elite capture and jobs/livelihoods challenges.

<sup>6</sup> The Pakistan Poverty Alleviation Fund (PPAF) housed within PASS, already implements some social insurance interventions.

<sup>7</sup> PASS Organigram: [http://pass.gov.pk/userfiles1/file/Organogram%20\(1\).pdf](http://pass.gov.pk/userfiles1/file/Organogram%20(1).pdf)

<sup>8</sup> The program is also aligned with CPS FY2015-2019: <http://documents.worldbank.org/curated/en/886791468083329310/Pakistan-Country-partnership-strategy-for-the-period-FY2015-19>.



12. **The proposed program is also aligned with the Bank's support in Pakistan, including the overall response to COVID-19.** The program is aligned with the recently approved Development Policy Credit Securing Human Investments to Foster Transformation (SHIFT, P170568), as it supports operationalization of some of the policy actions supported by Pillar C (Improving national safety nets for efficient response to shocks). It follows the emergency support for safety nets under the Pandemic Response Effectiveness Project (PREP, P173796) by moving into the recovery phase, and is within the overarching post-COVID agenda for Bank support to Pakistan, where SP emerges as one of four key support pillars. The project is also well aligned with other sectoral projects in education and health, and in particular, complements activities in the Emergency Action to Strengthen Performance for Inclusive and Responsive Education (ASPIRE, P173399) project and the National Immunization Support Project (NISP, P132308).

#### Rationale for Bank Engagement and Choice of Financing Instrument

13. **There is a strong, compelling rationale for the World Bank to support Pakistan's SP sector with a particular focus on crisis-resilience.** The proposed operation builds on a decade long engagement in the SP sector and is intended to help operationalize important areas of reform and usher in the next generation of SP initiatives beyond social assistance through cash transfers. The Bank's support began in 2009-2010 with a US\$150 million social safety net Development Policy Credit (DPC) for policy alignment on adoption of the targeting system, establishing BISP as the Federal Safety Net, and removing overlap and fragmentation of safety net initiatives at the Federal level. Following that, a \$210 million project was approved to institutionalize BISP and operationalize its cash transfer programs. The recent \$100 million National Social Protection Program-for-Results (NSPP, P158643), approved by the Board in 2016, continues to support strengthening of the delivery systems, including the ongoing update of the NSER and related first-time recertification process of BISP beneficiaries, and an initial expansion of WeT and Complementary Services. The Bank's leadership has leveraged parallel financing of over US\$ 1.2 billion from other development partners..
14. **The intended operation is multi-pronged, well aligned with the Federal Government's National Poverty Alleviation Plan and will also contribute to provincial SP objectives.** The proposed operation will expand the Bank's support to the broader SP agenda beyond BISP and social assistance. First, it will support the Government in exploring and establishing the next generation of SP initiatives targeting a subset of the informal sector to address key constraints preventing adequate risk mitigation. Second, it will also support enhancements to the delivery systems, particularly, the social registry and biometric payment systems, that can respond to the demand of the broader Ehsaas program. Third, it will support provincial needs beyond primarily meeting the needs of BISP and its flagship programs. And fourth, it will support the Government's overall strategy of investing in human capital in collaboration with the provinces as part of the national Ehsaas Program. With this transition, Pakistan would be better placed to effectively support the current crisis recovery and respond more rapidly to future crisis, through better coordination and monitoring.
15. **The PforR is the most suitable lending instrument given its strong focus on institutional strengthening, the existing implementation capacity, and the recurrent nature of expenditures.** The preceding Bank SP operation, Pakistan's National Social Protection Program, is also a PforR and has been a successful operation. The Government's has demonstrated ease of use of this instrument and has a functioning independent verification agency in place. The PforR also provides avenues to embed necessary reforms within the Government's existing implementation structure, thereby building Government's ownership and ensuring longer term sustainability. PforR is most suited due already established implementation and monitoring capacities with the client. Ideally, PforR is preferred in programs whose objectives are primarily dependent on recurrent expenditures, which is the case under the proposed project. It is also the most result-oriented instrument available, with financing tied to achievement of DLIs.



### C. Program Development Objective(s) (PDO) and PDO Level Results Indicators

#### Program Development Objective(s)

To support positive disruptions<sup>9</sup> and advances in the social protection system to make it more adaptive and to build crisis-resilience among poor and vulnerable households.

#### PDO Level Results Indicators

16. The progress toward achieving the PDO will be measured by the following indicators:

- (a) Number of districts where multiple-entry, localized, automated (MELA) update mechanism is in place.
- (b) Number of districts with forward and backward linkages to NSER active in the past 6 months.<sup>10</sup>
- (c) Number of beneficiaries participating in hybrid social-assistance-insurance scheme.
- (d) Number of districts with beneficiary centric payment mechanism available.
- (e) Percentage of BISP Kifalat beneficiaries with consumption below the program's socioeconomic score cutoff.
- (f) Number of CCT beneficiary children complying with school attendance and health/nutrition co-responsibilities.

### D. Program Description

#### PforR Program Boundary

17. **The project aims to advance Pakistan's SP system to make it an adaptive, crisis-resilient system and move toward the next generation of programs beyond social assistance.** The proposed project is expected to be in the amount of US\$300M equivalent and will span fiscal years 2021-2024. The program intends to achieve this by introducing positive disruptions to the existing safety net and delivery systems, introducing new reform directions, and consolidating recent gains. Specifically, it would:

- (a) Build-in greater innovation and technology within the SP system to strengthen the social registry, optimize the use of big data, and advance the delivery system components including the payment systems, the social registry, and related information systems.
- (b) Support the next generation of social protection interventions targeting the 'missing middle' (uncovered by existing safety nets or formal insurance) by testing innovative hybrid social assistance-social insurance mechanisms.
- (c) Promote medium- to long-term mitigation of COVID impacts by prioritizing the human capital accumulation among the youngest in the early recovery phase.

#### *Results Area 1: Building Crisis-Resilient Delivery Systems*

##### ***Sub-results area A: Innovations to the Social Registry***

18. **This results area focuses on transforming the existing social registry into one that is capable of responding to a range of crises and changing vulnerabilities.** The NSER is currently a static social registry which is undergoing its first nationwide update and downstream recertification process of BISP programs for the first time after being

<sup>9</sup> This terminology follows the CPF. Positive disruptions are defined as the introduction or expansion of innovative social protection interventions or delivery system approaches that have not yet been widely applied globally or within the Pakistani context.

<sup>10</sup> This would include links between provinces and NSER as well as to big data or other large data sources for targeting.



established in 2010. This results area would support introduction of a multi-entry, localized, automated system (MELA) to capture and score socioeconomic data on a regular basis to improve shock-responsiveness. Moving to a true social registry requires development of linkages with programs beyond flagship safety net programs, especially at the provincial level with, and built-in feedback loops. This results area will also support the setup and operationalization of a robust governance structure for the NSER to ensure adequate involvement of the provinces that will promote transparency in decision making related to the NSER.

### ***Sub-results area B: Beneficiary-Centric Biometric Payment Systems***

19. **This results area would support advances in the biometric payment system, including technological innovations to promote greater financial inclusion among women.** BISP recently overhauled the payment system to introduce a completely biometrically verified system that can potentially be linked to a savings account upon beneficiary's request and support the 'One woman, one account' agenda set forth by the Government. This results area would include the next generation of payment system reforms to link the BISP payment system to the National Payment Gateway, currently under development by the State Bank. This results area would also support operationalization of aspects of the One Woman-One Account initiative of PASS to support financial inclusion. Finally, it would explore additional technological innovations such as blockchain elements where suitable, to strengthen the transparency of cash transfers by increasing traceability of transactions and real-time reconciliation and monitoring.

### ***Results Area 2: Developing Innovative Hybrid Social Protection Mechanisms***

20. **This results area would help expand SP to include hybrid social assistance-social insurance programs to support the Government's aspiration of addressing challenges of informality around risk-mitigation.** The 'missing middle' of SP in Pakistan is largely composed of people engaged in the informal sector who are vulnerable to shocks due to limited savings and assets. This group is not eligible for the existing safety net programs targeted to the very poor (bottom 20 percent) nor covered by formal social insurance, including formal pensions, which have a very low coverage of 2.3 percent. The recent 2020 Labor Expert Group Report recommended that social protection should be extended to this group, in line with Ehsaas provisions. However, Pakistan's high levels of informality implies this 'missing middle' covers most workers, and given its severe fiscal constraints, coverage will undoubtedly have to be expanded gradually. This results area will therefore help the Government identify this group and develop suitable innovative hybrid social assistance-social insurance programs to help reduce their vulnerability to systemic and idiosyncratic shocks.

21. **The hybrid social assistance-social insurance (SA-SI) mechanisms would likely focus on recertified safety net beneficiaries and would aim to expand existing digital platforms.** Given the clear need for incremental expansion of coverage and the existing vulnerability profile of the intended beneficiaries, the initial scheme is expected to be developed for beneficiaries exiting from BISP programs following recertification. This would also support PASS in operationalizing the recommendations of the Labor Expert Group around development of a registry of informal workers linked to the NSER, which could be tested to identify and enroll beneficiaries into such a program.

### ***Results Area 3: Protecting human capital in the early and primary school years***

22. **As the immediate impact of the COVID-19 crisis dissipates, it will be critical to safeguard and rebuild human capital, particularly in terms of addressing malnutrition for the youngest.** Stunting rates in Pakistan for children under-5 are high at 37.6 percent (DHS Pakistan report, 2018). Poor nutrition during pregnancy is associated with greater risks of low birth weight babies, and higher child morbidity. In addition, poor demand and supply of



maternal and child health services, such as low rates of institutional deliveries and pre-and post-natal check-ups constrain human capital accumulation in infancy.

23. **This Results Area will therefore support a demand-side intervention aimed at incentivizing investments in health and nutrition in the early years.** To address the malnutrition challenge, the Government of Pakistan announced a series of interventions under the 'Prime Minister's First 100 Day Agenda' in late 2018 to promote human capital accumulation, including a package for the poor aimed at reducing stunting from 43 percent to 30 percent in 5 years. This Results Area will therefore support a CCT to help relax demand-side constraints among poor households in securing adequate nutrition for women and their children to help prevent long lasting impacts of malnutrition on brain function, health, and productivity.
24. **This results area will also support the nation-wide expansion of the Waseela-e-Taleem (WeT) CCT program, with primary school education related conditionalities, given its strong results.** Pakistan currently implements WeT CCT in 50 districts. Withdrawing a child from school is a common shock coping strategy that a demand side intervention like WeT can help prevent. A program like WeT becomes more relevant post COVID-19, when prolonged absence from school may require incentives to bring children back and retain them through times of crisis.
25. **This P4R will be supported by an Investment Project Financing (IPF) Technical Assistance (TA) component of USD 5 million for various aspects of the PforR implementation.** To inform the overall design of the crisis-resilient SP system, it would support impact and process evaluations of the COVID-19 response implemented by the Government. Related to Results Area 1: Building Crisis-Resilient Delivery Systems, it would provide TA to support: (i) design and evaluate the social registry's MELA mechanism; and (ii) assess the effectiveness of use of big data to complement traditional targeting methods to improve targeting performance; (iii) support to the social registry governance and data exchange mechanisms; and (iv) design and assess mechanisms to further strengthen the beneficiary payment system by exploring technological innovations and linkages with the National Payment Gateway once it is operational. On Results Area 2, it would provide TA to help guide the choice of an appropriate model for hybrid SA-SI scale up in the Pakistan context, namely: (i) design of the hybrid SA-SI model including monetary and non-monetary (behavioral nudges) design elements and evaluation of different design features; (ii) capacity building for management and implementation of the hybrid SA-SI system and development of a platform to support monitoring of contributions.

## E. Initial Environmental and Social Screening

26. **The overall environmental and social risks are rated as low.**
27. **Environment risks:** The program focuses on the strengthening and expansion of the existing social protection system in Pakistan. The design does not cause environmental risks and impacts. The project does not involve any civil works. Indirect environmental impacts caused by activities undertaken through the TA component will be assessed and any impacts will be mitigated with relevant and appropriate measures according to the nature of risks and impacts associated with these studies.
28. **Social Risks:** The primary social risk related to the Program has to do with inclusion of the potential beneficiaries through appropriate outreach and registration methods. The Program aims to employ technology-based solutions, such as self-registration, to ensure inclusion. The Program's success will depend on how it reaches vulnerable groups, such as women, elderly, persons with disabilities, religious, ethnic and sexual minorities, and the Kalasha Indigenous



Peoples. In addition, mobility constraints, overall low levels of literacy, and geographical differences in penetration of mobile phone and other technology will play a role.

29. The project will be implemented by BISP, with several key stakeholders including i) NADRA, ii) Provincial Education Departments iii) Provincial Environmental Protection Departments/Agencies, iv) civil society organizations working with women and labor, and on education, v) NGOs with outreach in rural areas such as the Rural Support Programme Network, and vi) Civil Society Platforms engaged in COVID-19 related relief work. BISP already has an elaborate grievance redressal system in place that is working satisfactorily, and this GRM will serve to voice the complaints/issues raised or faced by beneficiaries as well as all stakeholders.

30. Due to the onset of COVID-19 epidemic, the project shall incorporate measures to ensure the health and safety of project-affected communities during the project life cycle from both routine and nonroutine circumstances. This shall include the implementation of WB and WHO/CDC guidelines for ensuring the basic principles of infection prevention, such as social distancing, good hygiene practices, limited workforce, adjustment of workplace practices, contingency measures in event a worker contracts the infection and most importantly, awareness raising. These measures shall also be considered during stakeholder engagement. Covid 19 specific Community and Health and Safety Procedures will be developed (if not done already) and implemented.

Legal Operational Policies	Triggered?
Projects on International Waterways OP 7.50	No
Projects in Disputed Areas OP 7.60	No

Summary of Screening of Environmental and Social Risks and Impacts of the IPF Component

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