



# Project Information Document (PID)

Appraisal Stage | Date Prepared/Updated: 07-Apr-2022 | Report No: PIDA33412



**BASIC INFORMATION**

**A. Basic Project Data**

Country Nepal	Project ID P176543	Project Name Digital Nepal Acceleration (DNA) Project	Parent Project ID (if any)
Region SOUTH ASIA	Estimated Appraisal Date 12-Apr-2022	Estimated Board Date 16-Jun-2022	Practice Area (Lead) Digital Development
Financing Instrument Investment Project Financing	Borrower(s) Nepal	Implementing Agency Nepal Telecommunications Authority, Ministry of Communications and IT	

Proposed Development Objective(s)

To expand access to broadband in project areas, to improve the capacity of individuals and businesses to engage in the digital economy, and to enhance the foundations for digital government.

Components

- Expanding access to broadband
- Improving the capacity of individuals and businesses to engage in the digital economy
- Enhancing the foundations of digital government
- Project management

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

**SUMMARY**

<b>Total Project Cost</b>	180.00
<b>Total Financing</b>	180.00
<b>of which IBRD/IDA</b>	140.00
<b>Financing Gap</b>	0.00

**DETAILS**

**World Bank Group Financing**



International Development Association (IDA)	140.00
IDA Credit	140.00

**Non-World Bank Group Financing**

Commercial Financing	40.00
Unguaranteed Commercial Financing	40.00

Environmental and Social Risk Classification

Moderate

Decision

The review did authorize the team to appraise and negotiate

**B. Introduction and Context**

Country Context

- Over the past decade, Nepal’s economy demonstrated impressive growth and resilience when faced with a wide variety of economic shocks.** Unfortunately, the COVID-19 pandemic overwhelmed the country’s growth drivers and contributed to the country’s first economic contraction since 1983. A gradual recovery is underway, supported by vaccine rollouts and border openings.
- Over the period FY2012-19, Nepal’s economy performed reasonably well despite being hit by three large exogenous shocks in 2015 (earthquake), 2016 (trade disruptions), and 2017 (floods).** A fourth shock, the COVID-19 pandemic, derailed the strong growth trajectory established over the previous three years. Economic growth contracted by 2.1 percent in FY20, the first contraction since FY1983, as a nation-wide lockdown from March to July 2020 imposed to curtail the spread of the virus significantly impacted all sectors of the economy. Following the contraction in FY20, the economy is estimated to have grown by 1.8 percent in FY21 even though renewed containment measures were imposed in the fourth quarter of the fiscal year. Agriculture, contributing over one-fifth of nominal GDP, has been a bright spot registering 2.2 and 2.7 percent growth in FY20 and FY21, respectively, on the back of favorable summer monsoons. Industry and the services sectors were more severely impacted by the renewed containment measures. After contracting during FY20, the industry and service sectors are estimated to have grown by only 0.9 and 1.6 percent in FY21, respectively. The World Bank’s 2020 SAR COVID-19 phone monitoring survey shows that 45 percent of those who recovered from a job loss have switched sectors and taken jobs with lower earnings and skill requirements, indicating that many households have been pushed to marginally above or below the poverty line.
- Consumer price inflation fell significantly, reaching a record low in FY21, but has since increased.** Average inflation decreased to 3.4 percent in FY21, considerably below FY20 inflation of 6.3 percent and the central bank’s FY21 ceiling of 7 percent. The low inflation rate was driven by a decline in both food and non-food price increases. Average food inflation fell to 4.6 percent in FY21 from 8.6



percent the year before reflecting slower increases in vegetable prices due to the easing of pandemic-induced supply disruptions. Non-food inflation also decreased to 2.5 percent from 4.6 percent in FY20, chiefly due to a significant fall in housing and utilities inflation. In the first half of FY22, average inflation accelerated to 5 percent, reflecting higher transportation prices associated with global fuel price hikes and increased educational fees and housing prices.

4. **Starting in FY21, Nepal turned a corner, and the fiscal deficit began to narrow on the back of a strong post-COVID recovery of import-based taxes.** The fiscal deficit of the central government narrowed to 4.6 percent of GDP in FY21. A strong rebound in revenues supported the consolidation, with revenues increasing from 22.1 to 24.2 percent of GDP in FY21 driven by a recovery in trade-related taxes. In contrast, non-tax revenues declined, owing mainly to lower dividends and tourism-related royalties and visa fee collections. As observed in previous years, a fiscal surplus was recorded in Q1 FY22 as revenue outstripped expenditure growth; budget execution tends to accelerate in the last quarter of the fiscal year. While public debt has risen from 22.7 percent to 41.8 percent of GDP from FY17 to FY21, the risk of debt distress is currently assessed as low as per the Joint Bank-Fund Debt Sustainability Analysis of December 2021.

5. **The current account deficit is estimated to have widened to 8.1 percent of GDP in FY21 and is expected to increase further in FY22.** Drivers include a surge in imports and a drop in official remittance inflows, which in absolute terms far outpaced an increase in exports. In the absence of significant FDI inflows, the current account deficit was financed by trade credits, external concessional borrowing, and reserve drawdowns. Official gross foreign exchange reserves fell to USD 9.9 billion in mid-January 2022 (6.6 months of imports coverage) from USD 11.8 billion in mid-July 2021. In response, the central bank adopted measures to mitigate pressure on reserves, including limiting imports of luxury goods.

6. **Economic growth is projected to recover gradually to 4.1 percent by FY23.** The baseline forecast projects a gradual medium-term recovery, with growth accelerating from 3.7 percent in FY22 to 5.8 percent by FY24. The baseline assumes: (i) no new nationwide strict containment measures are imposed; (ii) a near complete vaccination of the eligible population by the end of FY22 (81.7 percent of the population aged 18 and higher have received full doses of vaccine by March 25, 2022); and (iii) a gradual increase in international migration and tourist arrivals, reaching pre-pandemic levels by FY24. Vaccination deployment is expected to unleash pent-up demand for most service sub-sectors. Industry sector growth is projected to be supported by increased hydropower production including from the recently completed Upper Tamakoshi plant. Agricultural growth is projected to decelerate in FY22, reflecting a decline in paddy production and the rise of global fertilizer prices earlier in the fiscal year. Increasing fuel prices are expected to weigh on aggregate demand.

7. **A new government took office on July 13, 2021,** following two years of political uncertainty and the reinstatement of parliament twice in February and July following its dissolution. A new cabinet took office in October 2021 and the country will get its next set of local government representatives following local polls announced for May 2022. The current coalition government of four major political parties is expected to remain intact until federal and provincial elections scheduled in FY2023. With the expected change in the federal, provincial, and local governments this year, development activities are expected to slow while new officials are assuming their duties. At the sub-national level, funds, functions, and staff continue to be managed by the seven provinces and 753 local governments for which legislation, institutions, and administrative procedures are being formalized as constitutionally prescribed.



Meanwhile, the federal government has been streamlined with a focus on national policies and oversight.

8. **Nepal is also one of the world’s most disaster and climate vulnerable countries.** Eighty percent of the Nepal’s geographic area is at risk from multiple hazards (floods, landslides, heavy rainfalls, glacial lake outburst floods) with much of the country’s population inhabiting high risk areas. Nepal is also in a seismically active zone and is exposed to a range of adverse impacts of climate change. The complex terrain and risks of natural disasters combined with the nascent federal system of government and ongoing political uncertainties pose critical risks to Nepal’s resilience and long-term growth and are expected to contribute to rising inequalities.

#### Sectoral and Institutional Context

9. **Nepal seeks to strengthen the resilience of its households, businesses, and government, while ensuring economic and social inclusion.** In September 2021, the Government of Nepal (Government) and development partners declared their intention to develop a strategic action plan for Nepal, geared towards Green, Resilient, and Inclusive Development (GRID). The plan will coordinate investments in Nepal’s recovery following the COVID-19 pandemic, including promoting “green growth, jobs, infrastructure, and building resilience to climate change and shocks from disasters, as well as equitable access to services for Nepalis.”<sup>1</sup>

10. **The Government sees digital development as a key enabler of growth, and of resilient and inclusive development.** Its Digital Nepal Framework (DNF) is a strategy adopted by the Government in 2019. It aims to use digital technologies to transform the economy by providing inclusive access to services and infrastructure for various groups of the population, promoting innovation and competitiveness in the private sector, and improving public service delivery.<sup>2</sup> The DNF seeks to digitize 8 sectors through 80 initiatives.<sup>3</sup> The planning commission has identified the DNF as a game-changing program.

11. **The DNF predates the GRID approach; however, it supports several priorities identified in the Kathmandu Declaration.** The DNF proposes digital initiatives that would boost inclusion and resilience, as well as green growth.<sup>4</sup> Other national development plans, such as the Fifteenth National Plan (15NP; for Nepal’s fiscal year 2019/20 to 2023/24)<sup>5</sup> also envisage enhancing various areas of the digital ecosystem. Stakeholders from the private sector and civil society also note the need for Nepal to accelerate digital development, especially to ensure inclusion and to promote innovation. Many Nepalis concur with the concept of digital access as a critical part of the response to the COVID-19 pandemic and

1 <https://www.worldbank.org/en/news/press-release/2021/09/24/government-of-nepal-and-development-partners-join-forces-on-nepal-s-green-resilient-and-inclusive-development>

2 <https://mocit.gov.np/pages/digital-nepal-framework>

<sup>3</sup> The included sectors are digital foundations, health, agriculture, urban infrastructure, energy, education, financial services, and tourism.

<sup>4</sup> For instance, the DNF seeks to ensure universal access to the internet, build digital skills and literacy, and deploy technology to expand access to education, healthcare, and financial services—all of which support economic and social inclusion objectives. The DNF also seeks to improve the innovative capacity of people and firms across sectors such as tourism and agriculture, which will boost their economic resilience, while using digital means to improve public service delivery, which will support resilient and inclusive government to citizen interactions. And, the DNF seeks to support areas of green growth, such as climate-smart agriculture and smart grids, and promote innovations in water resource management.

5 [https://npc.gov.np/images/category/15th\\_plan\\_English\\_Version.pdf](https://npc.gov.np/images/category/15th_plan_English_Version.pdf)



its challenges.<sup>6</sup> The private sector has also expressed interest in playing a more-strategic role, building on existing developments in telecoms connectivity, digital financial services, and e-commerce platforms.

12. **Nepal’s potential to use digital development to support GRID is inhibited due to gaps in digital inclusion, the limited capacity of people and businesses to use digital technologies innovatively, and weaknesses in the foundations of digital service delivery.** Digital inclusion (ensuring that all individuals and businesses have access to affordable, high-speed connectivity and secure digital services) is hindered by gaps in coverage and affordability of high-speed connectivity. Coverage gaps are typically due to high costs of deployment especially in rural and in mountainous areas, while the high cost of upstream international connectivity leads to increased prices. Digital innovation (firms and people using digital technologies to boost productivity and competitiveness) is limited by the small talent pool of skilled workers, and gaps in the supporting ecosystem, especially outside of the capital, Kathmandu. Digital public and private service delivery is hampered by gaps in the infrastructure (e.g., limited capacity and resilience of government data centers (DCs)), poor coordination among public agencies, institutional capacity constraints, limited funding, and gaps in foundational elements (e.g., identification, digital signatures).

13. **The proposed Project is consistent with the Government’s development plans.** Nepal intends to be a middle-income country by 2030.<sup>17</sup> It envisions transforming Nepal into a knowledge-based economy, with ICT as a crucial driver of growth. This Project is consistent with government strategies, such as the 15NP (2018/19 to 2022/23) and implements several foundational elements of the DNF.

14. **The Project is consistent with the World Bank Group (WBG) Performance and Learning Review (PLR) of the Country Partnership Framework (CPF) for FY19-FY24 discussed by the Board on February 24, 2022 (Report Number 168048).** The PLR introduces a new CPF<sup>8</sup> objective on accelerating digital development under Focus Area 2 (Private Sector-Led Jobs and Growth), with an indicator on increasing the use of the internet to 85 percent of the population by the end of FY24. The PLR recognizes that, “Investing in the digital economy can support Nepal’s resilient recovery from COVID-19 by providing access to information, services, and markets while promoting innovation in service delivery in the public and private sectors.” Thus, the PLR notes that the WB will support investments to build Nepal’s digital foundations. The proposed Project will also support Nepal’s transition to GRID, especially on inclusion and resilience.

### C. Proposed Development Objective(s)

#### Development Objective(s) (From PAD)

To expand access to broadband in project areas, to improve the capacity of individuals and businesses to engage in the digital economy, and to enhance the foundations for digital government.

<sup>6</sup> A World Bank survey found that 19 percent of respondents placed promoting digital and internet services among the top three areas to “focus on for COVID-19 recovery,” alongside tourism (23 percent) and private sector development (11 percent). World Bank, Public Perception Survey 2021

<sup>7</sup> Policies and Programs of the Government of Nepal for Fiscal Year 2072–73 (2015–16), presented by Rt. Hon. President Dr. Ram Baran Yadav at the Meeting of the Constituent Assembly/Legislature-Parliament.

<sup>8</sup> The World Bank Group Country Partnership Strategy FY19-23 was discussed by the Board on August 7, 2018(Report No. 83148-NP).



Key Results

Result area	PDO-level indicators
Expanded access to broadband	1. People provided with access to broadband services <ul style="list-style-type: none"> <li>• Share among female inhabitants of Project areas</li> <li>• Share among inhabitants of rural municipalities</li> </ul>
Improve the capacity of individuals and businesses to engage in the digital economy	2. Beneficiaries of the digital skills development program who report being employed or in education (percentage of trainees) <ul style="list-style-type: none"> <li>• Among female beneficiaries</li> <li>• Among beneficiaries who are persons with disabilities</li> </ul>
Enhance the foundations of digital government	3. Number of new digital government services available to the public, under the Project

D. Project Description

15. **The Government seeks investment project financing from the IDA to implement high-priority and foundational elements of DNF.** Total costs for the proposed Project are equivalent to US\$180 million, including US\$140 million in IDA financing, which will support an estimated US\$40 million in private capital mobilized (PCM) for activities focused on expanding access to broadband in rural areas. The Project focuses on building high-priority digital foundations and some analog foundations (e.g., the trust ecosystem, digital skills) and will coordinate with other public agencies or development partners on the wider range of DNF initiatives and associated analog complements (notably on digital businesses, digital financial services, and digital services). It is estimated that implementing the 80 initiatives of the DNF could cost up to \$1 billion. Hence, full DNF implementation will need to draw on a mix of resources including the private sector and development partners apart from the proposed IDA financing (with possible future phases to support downstream activities).

**Component 1: Expanding access to broadband** (IDA US\$71 million equivalent plus US\$40 million equivalent targeted private capital mobilization)

- Promote rural broadband access and use through (i) policy and regulatory reforms that reduce the costs of broadband network deployment; (ii) funding one-time subsidies (awarded competitively) to service providers to de-risk private investments to expand climate-resilient high-speed broadband services in selected municipalities, including public institutions (e.g., health centers, schools); (iii) programs—designed with community input— to promote digital literacy and broadband adoption among specific user groups (e.g., girls and women,<sup>9</sup> students,

<sup>9</sup> Activities could include programs to increase awareness about protecting children, girls, and women to protect them against cyber-bullying, online harassment, or similar risks, and to increase the responsiveness of public officials on these issues.



persons with disabilities, low-income households, people from areas vulnerable to climate change, and small businesses).

- Improve international connectivity through creation of a virtual landing station and pre-purchase of bulk international bandwidth for the Government and priority users (e.g., educational institutions).

### **Component 2: Improving the capacity of individuals and businesses to engage in the digital economy** (IDA US\$5 million equivalent)

- Develop advanced digital skills of individuals through a program responsive to private sector demand for digitally skilled workers (in IT-related sectors and possibly across other sectors and occupations) and seeking to increase employability of participants (with a focus on women, persons with disabilities, and people from rural areas, or areas vulnerable to climate change-related economic transitions).
- Support digital businesses, through: (i) support to incubation and acceleration programs for digital startups; and (ii) advisory support and feasibility studies to develop the planned Information Technology (IT) Park and a network of innovation and cocreation centers.

### **Component 3: Enhancing the foundations of digital government** (IDA US\$63 million equivalent)

- Enhance the digital trust ecosystem through the development of digital signatures, the cybersecurity regulatory framework and capacity within the Government, including the establishment of a national cybersecurity cell, enhancement of the personal data protection regulatory framework.
- Improve data center (DC) capacity by supporting policy development, standards, and compute, storage, and network capacity improvements, to improve the capacity, use, and the climate-resilience of the government's DCs.
- Implement select digital services through the design and implementation of at least ten DNF initiatives (beyond those supported through the other Project activities) including through partnerships with the private sector and other stakeholders (e.g., development partners, civil society organizations).<sup>10</sup>

### **Component 4: Project management and coordination** (IDA US\$1 million equivalent)

- This will support Project management and coordination functions, including capacity building of staffs of the implementing agencies. It will finance technical support, fiduciary, environment & social (E&S) standards implementation, and monitoring & evaluation. It includes incremental operating costs relevant to the Project.

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<sup>10</sup> The Bank will also assist the MoCIT to update the DNF to reflect evolution of technology and national socio-economic development status through parallel advisory services.



Legal Operational Policies

Triggered?

Projects on International Waterways OP 7.50

No

Projects in Disputed Areas OP 7.60

No

Summary of Assessment of Environmental and Social Risks and Impacts

16. The project coverage is nationwide in scope and centers on three components that seek to enhance digital infrastructure, build digital capabilities, and support digital transformation, including several high-priority activities following the Digital Nepal Framework (DNF) 2019. The Ministry of Communications and Information Technology (MoCIT) will implement the Project. Other implementing agencies include Department of IT (DoIT), the National IT Center (NITC), and the Nepal Telecommunication Authority (NTA). A Project Steering Committee (PSC) will provide strategic oversight and a Project Management Unit (PMU) would facilitate all Project administrative activities. MoCIT will establish a Project Management Unit (PMU). The PMU will recruit environmental and social specialists and other implementing agencies will designate E&S focal points in their Project Implementation Teams (PIT). All implementing agencies will need significant capacity building in E&S planning and management. The ESMF and ESCP include relevant E&S training and capacity building measures.

17. Both the environmental and social risks have been categorized as “moderate.” The relevant ESSs are ESS1, 2, 3, 4, 5, 6, 7, 8 and 10. Key environmental risks and impacts are expected to be site-specific, short-term, and reversible. Some of the anticipated potential impacts may include: (i) soil removal and vegetation clearance for the construction of the new data center, and for the deployment of fiber optic cables; (ii) generation of solid waste from residual construction materials; (iii) management and disposal of electronic waste (E-waste) as a result of the decommission of old equipment which includes unused e-gadgets, fibers and electronic wires; and (iv) nuisance related to dust generation, vibration and noise during construction activities. Potential social risks include i) temporary restriction of access to land/property and livelihood impacts during construction of new data center and laying of fiber optic cables depending on the length and location of the cables (e.g. roadside vendors); ii) cumulative and/or more severe impacts faced by IPs and other vulnerable groups such as women-headed households, elderly population, people with disabilities on livelihoods/physical displacement on the potential route of fiber optic network; iii) the project implementation units (PIU)s management capacity to engage in safeguarding social risks; iv) weak enforcement of national regulation; v) community health and safety; vi) potential influx of labor into targeted areas; vii) Occupational Health and Safety (OHS) hazards for the workers; viii) social risks associated with protection of personal data and data privacy considerations, and; ix) social exclusion of women, population living in rural and small town areas, persons with disabilities and other members of vulnerable groups in accessing project benefits. There is also continued risks associated with the COVID-19 pandemic and a need for having a robust plan on COVID-19 protocols. However, none of these risks are irreversible and long term and may be avoided, minimized and mitigated through appropriate E&S planning and management.



18. The SEA/SH risk of the project has been assessed as Moderate based on the risk screening tool. The project will develop SEA/SH response and prevention Action Plan with specific mitigation and response measures such as stakeholders' consultations and awareness on GBV/SEA/SH, mapping of project areas service providers, CoCs for project personnel and workers, and strengthening institutional mechanisms that aid in accessing grievance redressal.

19. To ensure that all risks related to project activities are adequately managed, an ESMF has been prepared in line with the Bank's Environmental and Social Standards and national regulations including Government of Nepal's Environmental Protection Act 2019 and Environmental Protection Rule 2020 and disclosed. The ESMF includes the positive and negative, direct and indirect environmental and social impacts of the project and defines appropriate mitigation and management measures in accordance with the mitigation hierarchy (anticipation and avoidance, minimization, mitigation, offset or compensation). The ESMF provides guidance on environmental and social screening and procedures for the development of environmental and social management plans (ESMPs) to be prepared by the Implementing Agencies, when necessary and before any works begin based on the specific characteristics of the project activities. In addition, the client needs to undertake an environment and social screening and required E&S instruments in the first stage of early implementation to influence technical designs and before works commence.

20. The client is planning to establish four data centers (in Khumaltar, Kolhapur, Butwal and Dharan). The construction of these data centers will not be financed by the project. However, these are considered as associated facilities for the project and ESF will apply to these construction activities.

21. The Borrower has prepared and disclosed a Stakeholder Engagement Plan (SEP). The SEP describes (i) the project stakeholders, making a distinction between those directly affected by the project and other interested parties; (ii) the timing and methods of engagement with key stakeholders throughout the life cycle of the project, including engagement activities before project appraisal, as well as local-level consultations once the locations of infrastructure interventions is known; (iii) the type of information that will be provided to stakeholders and how feedback from stakeholders will be solicited and recorded, (iv) differentiated measures to remove obstacles to participation as well as allow the effective participation of those identified as disadvantaged or vulnerable, and (v) the project-level Grievance Mechanism to be developed by the borrower. Key stakeholders of this project include government officials, private sector businesses, internet users, women, people living in rural communities and small towns, members of social minorities, small business owners, people with disabilities, school-going children, and other stakeholders will be identified early on in the engagement process. These will also include indigenous groups for whom a culturally appropriate process may be required.

22. The SEP describes a project-level Grievance Mechanism (GM) accessible to project stakeholders according to the requirements of ESS10 to handle complaints by project-affected people regarding adverse temporary or permanent project impacts. The project GM will be used for workers' grievances as per ESS2 and land/asset related issues as per ESS5. The GM will be responsive to the risk of SEA/SH, and the need to be accessible to a wide diversity of stakeholder groups. It will also serve as a platform for continuous feedback from project-affected communities, other interested stakeholders and implementing structures.



23. The Project will include direct workers, contracted workers and primary supply workers. A Labor Management Procedure (LMP) has been prepared as part of the ESMF following ESS2 and disclosed prior to appraisal. All workers will access the Project GRM as described in the LMP and SEP and consistent with ESS2 and ESS10. The Project GRM will include experts familiar with labor related grievances and relevant policies.

24. Project activities such as establishment of data centers, setting up of cyber security centers, deployment of fiber optic cables and potential establishment of IT Park may require land acquisition, loss of private land/assets and temporary restriction on land use. The construction of the four data centers will not be financed by the project. However, these are considered as associated facilities for the project and ESF will apply to these construction activities. Given that the specific sites for infrastructure interventions are not yet known, the borrower has prepared a Resettlement Framework (RF) prior to appraisal to clarify resettlement principles, organizational arrangements, and design criteria to be applied to subprojects or project components to be prepared during project implementation when a subproject requires land acquisition. The RF sets out the procedures to be followed for the preparation of site-specific Resettlement Action Plans (RAPs) as needed in accordance with the requirements of ESS5, including eligibility criteria for affected persons, procedures and standards for compensation, arrangements for consultations of project affected people, budget and monitoring arrangements.

25. To the extent technically feasible, construction will not occur within official protected areas or other areas of known high biodiversity or ecology value. In the event construction occurs in or near any of these areas, ESS6 risks and impacts are outlined in the ESMF with adequate mitigation measures in place to ensure the sustainable management of natural resources. Site -specific ESMP will prepare with mitigation hierarchy to mitigate the possible negative impacts caused on forest and biodiversity.

26. As the coverage of the project will be nation-wide that will include areas inhabited by IP groups, the ESMF and SEP provide guidelines on how to avoid adverse impacts of the project on these communities and ensure their access to services and potentially participation in project activities and benefits.

## E. Implementation

### Institutional and Implementation Arrangements

27. **The Ministry of Communications and Information Technology (MoCIT) will oversee implementation of the Project.** It will constitute a Project Steering Committee (PSC), chaired by the Secretary of MoCIT and including representatives of key agencies involved in the implementation of various activities, including the MoCIT itself and its Department of IT (DoIT) and the National IT Center, the NTA, and other ministries and organizations—including private sector representatives—that are key stakeholders.

28. **The Project will have four implementing agencies (IAs)—MoCIT, DoIT, NITC, and NTA—supported by a Project Management Unit (PMU) housed at the MoCIT.** Each agency will be responsible for implementation of specific activities. The PMU will: (i) support all IAs in all Project-related E&S and fiduciary activities and (ii) implement SCs 3.1 and 3.3 on behalf of MoCIT. The relationships, roles, and responsibilities of the various parties would be defined in the Financing Agreement (FA) and the Project



Operations Manual (POM). Responsibilities of NTA will be defined through a Project Agreement given that agency's status as an independent regulatory agency and statutory body. In case of any conflict among these documents, the FA shall be the reference.

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**APPROVAL**

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**Approved By**

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