

<b>Integrated Safeguards Data Sheet (ISDS)</b>	
<b>Section I – Basic Information</b>	
Date ISDS Prepared/Updated: April 25, 2004	Report No.:AC179
<b>A. Basic Project Data</b>	
<b>A.1. Project Statistics</b>	
Country: Bangladesh	Project ID: P040712
Project: Water Management Improvement Project	TTL: Mohinder S. Mudahar
Total project cost (by component): \$147.5 m	
Appraisal Date: February 10, 2004	Loan/Credit amount(\$m): IDA: 84.6
Board Date: July 1, 2004	
Other financing amounts by source:	(\$m.)
Netherlands Ministry of Foreign Affairs/ Ministry of Development Cooperation	20.0
Managing Unit: SASRD	Sector: General water, sanitation and flood protection sector (75%); Irrigation and drainage (25%)
Lending Instruments: Specific Investment Loan	
Is this project processed under OP 8.50 (Emergency recovery)?	Yes [ ] No [X]
Environmental Category: B	Safeguard Classification: S2
<b>A.2. Project Objectives</b>	
<p>The primary Project Development Objective (PDO) of the proposed project is to improve national water resources management by involving the local communities to play an expanded role in all stages of the participatory scheme cycle management, from planning and design to operations and management. The secondary objective is to enhance institutional performance of the country's principal water institutions, particularly BWDB and WARPO. This is expected to result in reduced vulnerability and enhanced livelihood opportunities for the beneficiaries, and will also create a more favorable environment for improved water resources management by the core water institutions, in partnership with the beneficiaries. The PDO would be achieved by gradually changing a centralized top down approach to a more decentralized and participatory water sector management approach for efficient and sustainable operations and management of the existing FCD/FCDI schemes.</p>	
<b>A.3. Project Description</b>	
<p>The project deals with the new approach to water resource management with stakeholders' participation and is implemented through the following three components: (i) System Improvement and Management Transfer (SIMT); (ii) O&amp;M Performance Improvement (OMPI); and (iii) Institutional Improvement (II).</p>	
<p><b>Component 1: System Improvement and Management Transfer (Total Cost of US\$91.0 million):</b> This component would support rehabilitation and improvement (R&amp;I) of about 102 existing medium and large FCD/FCDI schemes of BWDB, covering approximately 378,900 hectares of land. The project schemes will be selected in batches from seven BWDB zones by following a set of selection criteria to enhance the project impact and sustainability. The SIMT procedure will follow a systematic approach of Participatory Scheme Cycle Management (PSM). Important design features of the component include: (i) the participatory process in scheme cycle management, which is based on the Guidelines for Participatory Water Management adopted by the Government; (ii) a resource database survey, GIS and mathematical modeling tools that would be used in screening and auditing the FCD/FCDI batches of schemes; and (iii) an annual process of selecting eligible batches of medium and large FCD/FCDI schemes located in a particular hydrological unit.</p>	

The component would provide support for technical assistance for PSM, including screening, auditing and training; rehabilitation and improvement works; and the incremental costs associated with implementing the System Improvement and Management Transfer of the selected FCD/FCDI schemes. The component would also support establishment and strengthening of Water Management Organizations (WMOs) and subsequent mainstreaming the PSM approach to BWDB. The project would support social mobilization and capacity building to assist WMOs to become fully functional and sustainable and to enable BWDB field offices to be able to implement the PSM approach. The WMOs would be established under the Cooperative Societies Act. The WMOs will consist of, depending on the size of the FCD/FCDI schemes, WMG (Water Management Group), WMA (Water Management Association) or WMF (Water Management Federation).

**Component 2: O&M Performance Improvement (Total Cost of US\$38.3 million):** This component would support measures to improve O&M performance of about 98 BWDB schemes, which are “technically functional” and do not require major R&I. In order for medium and large FCD or FCDI schemes to be included in this component, the schemes should have functioning WMOs or similar beneficiary organizations. The component would also aim to improve culture and practice of O&M planning and execution cycle within BWDB. The project schemes for O&M will be selected from BWDB Circle(s) or Division(s) of the BWDB’s seven Zones.

The objective of this component is to ensure the sustainability of those schemes that are currently functioning well and have undergone major rehabilitation and improvement under component 1 (or gone through a similar process under projects funded by GOB or other donors). The project would finance only the physical O&M requirements on a declining basis (starting with 80% in year 1). In all the selected schemes, Government’s matching funds (100% of engineering and administration cost and GOB share of maintenance cost) are expected to be made available on timely basis. The scheme performance will be monitored in the year following the introduction of the O&M performance improvement practices in the scheme. It was agreed that no further funding will be made available for this component if GOB fails to provide the timely matching funds. Likewise, further O&M funding will be discontinued for non-performing schemes or in case of a failure in management transfer to the WMO. The component would also support technical assistance and training associated with O&M improvement.

A program of new initiatives to foster improvements in O&M planning and financing would consist of mechanisms for prioritizing allocation of expenditure between types of activities and between schemes; improved O&M execution methods, including contracting arrangements; and monitoring mechanisms to measure FCD/FCDI scheme performance and to judge O&M efficiency and effectiveness through annual assessments against agreed performance standards and by third-party audit.

**Component 3: Institutional Improvement (Total cost of US\$18.2 million):** This component would support the institutional improvement of BWDB and WARPO, which are the two major national Government institutions that deal with the nation’s water resources. The project would also support activities related to program coordination, monitoring and evaluation and strategic studies/fiduciary reviews. The component would finance technical assistance, including consultancy services for institutional improvement, change management, capacity building, training and monitoring and evaluation; computers, office equipments, vehicles, survey and monitoring equipments, and other required physical facilities.

**(a) BWDB Institutional Improvement (Total cost of US\$8.9 million):** The project would support implementation of BWDB reforms, focusing primarily on implementation of decisions already made by the Government to restructure and strengthen BWDB as a water resources management agency rather than just a development agency. It would therefore support initiatives to make the operations more effective, efficient and transparent, including human resource development. MOWR has already reviewed its staffing requirements and is implementing a policy decision to downsize its staffing from 18032 to about 8860 by 2006 through attrition. However, given the types of activities that BWDB would need to carry out now and in the future, there is an urgent need to determine the skill requirements of BWDB and staff the organization with appropriately skilled staff with a mix of engineering, environment, water management, drainage, community mobilization, agricultural extension and related skills. The analysis of gaps in skill, training, capacity building and reorientation and change management inputs to staff, along with recruitment of appropriately skilled staff, would also be strengthened. The project would also provide technical assistance and equipment, support minor renovation of existing training centers and strengthen the M&E as well as the fiduciary roles of the BWDB.

The specifics of the time-bound action program agreed with IDA include: (i) further rationalization of BWDB staffing and improvement of the staff skill-mix; (ii) design and implementation of need-based staff training programs; (iii) phased devolution of authority to Zonal Chief Engineers to foster the concept of integrated management of local water resources; (iv) improvement of transparency and accountability through improved procurement system and contract administration practices; better budgeting and financial management systems; enhanced monitoring and evaluation functions; and timely preparation and disclosure of financial and performance information; and (v) implementation of the initial phase of modernizing BWDB's operations through computerization/information systems in functional areas.

**(b) WARPO Institutional Improvement (Total cost of US\$4.2 million):** The project activities under this sub-component would support: (i) core organization improvement and development activities; and (ii) maintenance, updating and dissemination of the National Water Resources Database (NWRD). It was agreed that project activities related to WARPO will be limited to the "core" function only. The funding for the WARPO building complex is premature to consider at this time. However, it may be considered after WARPO's enhanced role is mandated by the Government during the implementation of the approved National Water Management Plan. Therefore, under the WARPO component, the project would support two core activities, namely, (i) limited strengthening of WARPO Organizational and Institutional Development and (ii) Maintenance, Updating and Dissemination of National Water Resources Database (NWRD). The item (i) includes TA Consultancy for Institutional Support, local and foreign training, workshops and seminars on Integrated Water Resources Management, office equipment and facilities, and transport vehicles. The item (ii) would include a Consultancy Service of foreign and local consultants.

**(c) Program Coordination and Monitoring (Total cost of US\$5.1 million):** During the project period, the coordination and facilitation of the activities would be carried out by a Program Coordination Unit (PCU). This sub-component would support the establishment, operation and facilitation of the PCU by providing office equipment and transport facilities. The innovative PSM approach to the rehabilitation and improvement, operation and maintenance and integrated approach to water management within BWDB schemes will require a systematic Monitoring and Evaluation (M&E) as well as learning activities. For that a TA consultancy team of international and national experts would be provided under this sub-component. As per the new fiduciary requirements proposed under the Bangladesh Public Procurement Reform Project, all procurement activities executed in BWDB have to undergo annual ex-post reviews of at least 20 percent of its annual contracts. The project would

therefore support selective strategic studies, fiduciary reviews like annual ex-post procurement audit reviews and other thematic studies which may be needed from time to time.

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

The existing FCD/FCDI schemes are dispersed throughout the country, where the priority schemes are likely to be in areas more prone to floods and cyclones. The schemes for rehabilitation/improvement under the project are to be selected by using a set of ‘selection criteria’ where local demand and existence of water management organizations are the two vital criteria for selection of specific schemes. As planned, FCD/FCDI schemes for the project require that sufficient progress is made with strengthening of the WMOs. The rehabilitation/improvement works will mostly be carried out on the existing schemes. Use of private lands, wherever needed, will be in strips along the existing facilities. Land requirements are also likely to be limited where embankments, if any, are to be retired, and the associated impacts are unlikely to be severe because of the linearity of the embankments. Since the project is designed to rehabilitate/improve the existing schemes, it is not expected to have any major environmental impacts; rather the project will mitigate any adverse impacts that may have been caused under the existing FCD/FCDI schemes.

**B. Check Environmental Category A , B , C , FI**

Comments: The proposed project is not expected to have any major environmental impact since it is designed to rehabilitate and improve the existing FCD/FCDI schemes and strengthen institutional capacity related to environmental assessment and protection.

**C. Safeguard Policies Triggered**

	Yes	No
Environmental Assessment (OP/BP/GP 4.01)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Natural Habitats (OP/BP 4.04)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pest Management (OP 4.09)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cultural Property (draft OP 4.11 - OPN 11.03-)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Involuntary Resettlement (OP/BP 4.12)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Indigenous Peoples (OD 4.20)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Forests (OP/BP 4.36)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Safety of Dams (OP/BP 4.37)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Projects in Disputed Areas (OP/BP/GP 7.60)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Projects on International Waterways (OP/BP/GP 7.50)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Section II – Key Safeguard Issues and Their Management**

**D. Summary of Key Safeguard Issues.**

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

The activities under the project are primarily a combination of institutional improvement and rehabilitation and improvement of FCD/FCDI infrastructure to make them more environmentally and socially sustainable, and to mitigate past adverse environmental impacts. The physical works, which will be carried out to rehabilitate and improve the existing FCD/FCDI schemes under the project are highly unlikely to cause any significant adverse impacts, as the civil works will largely remain limited to the lands already used to create the physical infrastructures. It is however likely that the civil works may temporarily affect people who may have been using the embankments, especially the sections used as roads and pass through the villages, to live on and/or make a living from. Wherever required, lands will be acquired from the landowners. The scale of displacement, although expected to be very limited, will depend upon the scope of rehabilitation and improvements designed for the individual schemes. In any case, the impacts of land acquisition, if any, are likely to be moderate because of linearity of the embankments.

The potential environmental impacts are overall cumulative impacts, localized impact on natural habitats and the potential increase in the use of agricultural pesticides. The cumulative impacts on water flow and natural habitats from numerous sub-projects in each particular hydrological region will be examined during the initial overall screening and selection of the sub-projects. The localized impact on natural habitats, in particular fish spawning sites and protected areas, will be determined during the participatory selection process of the FCD/FCDI schemes, as well as during implementation of the civil works designed for their rehabilitation and improvement. The improved management of water flow and drainage is expected to enhance agricultural productivity and diversity which, in turn, may bring about increased use of pesticides.

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

The project is likely to have potentially positive impacts since it is designed to mitigate past adverse environmental impacts as well as enhance the role of local communities in the rehabilitation and O&M of FCD/FCDI schemes.

**D.3. Describe the treatment of alternatives (if relevant)**

An Environmental Assessment (EA)/Environmental Management Framework (EMF) and Environment Management Plan (EMP) for the larger hydrological regions and for each of the individual FCD/FCDI schemes will be prepared to guide scheme (sub-project) screening and participatory mitigation planning and implementation. The EA and EMF/EMP will be made an integral part of the participatory scheme cycle management (PSM) to ensure that the principles will be addressed throughout the implementation process and not as a separate exercise.

Rehabilitation and improvement works in some of the existing FCD/FCDI schemes may require a moderate amount of private land and cause displacement of squatters, if any, from the embankments. Although the impact details will not be known until the specific schemes are selected, a *Resettlement Policy Framework (RPF)* has been prepared to deal with the potential adverse impacts of land acquisition and displacement, by following the Bank's OP 4.12 on Involuntary Resettlement. While the RPF will apply to the entire project, separate *Resettlement Action Plan (RAP)* will be prepared for each yearly civil works program as the selection of FCD/FCDI schemes and design of the rehabilitation and improvements proceed. In preparing the RAPs, alternative designs will be considered to minimize requirements for additional land and physical relocation by taking into account direct inputs from WMOs, landowners and other stakeholders, which will be generated through the PSM cycle.

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

An overall EMF has been prepared and fully integrated into the entire participatory scheme cycle management process (PSM) both at the Government and community levels. This will include a screening and mitigation framework and corresponding institutional framework, to be in place during selection, implementation and monitoring and evaluation of the diverse investments.

The EIA guidelines prepared by WARPO for large FCDI schemes will be applied for the rehabilitation of schemes between 5000 ha to 15,000 ha in size. EA will be conducted for each medium sized sub-project by the WMO and BWDB and the mitigation activities agreed upon in a MOU. Based on the EA, an EMP will be prepared and customized for each type, location and scale of activity. The guidelines of community level EA have been prepared by IUCN and already field tested.

Monitoring of the impacts during the project will be conducted by a “monitoring team” comprising of selected WMO members, officials from BWDB, DAE, DOF, DOE and LGI. A record of the EAs will be kept in BWDB and WARPO. Training will be given to the monitoring team members and appropriate members of their agencies to ensure the proper implementation of the EMF, EIA and EMP. BWDB has made provisions to increase the number of environmental staff in BWDB to ensure sustainability of the environmental capacity of BWDB.

With respect to actions to address specific environmental safeguard issues, any potential cumulative impact will be addressed at the initial screening of the schemes, and any scheme that may cause adverse impacts will not be included in the project. The potential impact to natural habitat will be mitigated through appropriate design of the sluice gates and management of related water infrastructure. The potential use of pesticides will be mitigated through the already on-going Government IPM program which will also be implemented through the PSM program.

The *Resettlement Policy Framework (RPF)*, contains a legal framework outlining the principles and guidelines for land acquisition; impact mitigation principles and measures; implementation mechanisms; monitoring and evaluation arrangements; and others to provide the bases to plan and implement activities required to mitigate the project’s adverse impacts. The RPF draws substantially on the resettlement programs executed by BWDB under the Bank-supported River Bank Protection Project (RBPP: Cr. 2791-BD), Coastal Embankment Rehabilitation Project (CERP: Cr.2783-BD), and several other projects in Bangladesh. With this RPF in place and progress in design of the rehabilitation/improvements on the selected FCD schemes, separate *Resettlement Action Plans (RAPs)* will be prepared for the yearly physical works program, and will generally contain needs for any additional land; other impact details under each scheme undertaken for rehabilitation and improvement; implementation budget and time-schedule.

A notification exemption has been approved by the Regional Vice President for *OP/BP 7.50*.

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

Key project objectives and activities are to increase stakeholder participation in water resources management, including transfer of selected water management functions to local communities. The 'Guidelines for Participatory Water Management' provides the operational framework to include local stakeholders in water resources management. These Guidelines provide for participation of various categories of stakeholders (farmers, fishermen, small traders, craftsmen, boatmen, landless people, destitute women, NGOs, etc), including their mobilization and organization into WMOs and their constituent management associations and groups. The focus of the Guidelines is on stakeholder participation in the entire water management cycle (identification, planning, design, rehabilitation/improvement of FCDs/FCDIs, O&M, and monitoring and evaluation). The project would support implementation of participatory water management using these Guidelines as also using the experience of several similar projects implemented by BWDB and other GOB agencies with support from other donors, such as CIDA, ADB and the Government of Netherlands.

During project preparation, scoping sessions were carried out with various stakeholder groups to better understand the users’ perspective on rehabilitation/improvement needs, problems and potential solutions, and arrangements for project implementation, and operation and maintenance. Consultation and discussion sessions were held during the Environmental Assessment/Environmental Management Plan preparation process wherein safeguard policies of the Bank relevant to the project were explicitly elaborated. A workshop was also held to provide information to, understand views of, and discuss collaboration arrangements with, various stakeholders on the project.

The TOR for the EMF and EA/EMP guidelines was formulated after consultation with various parties involved in environmental issues in Bangladesh. Extensive consultations with stakeholders, who may be either adversely or positively impacted from an environmental viewpoint, were held during the preparation of the EMF and EA/EMP guidelines.

In line with the provisions of PSM cycle, the RPF requires direct involvement of WMOs, affected landowners and other stakeholders in all aspects of the land acquisition and resettlement processes, including compensation, grievance redress, implementation, and monitoring and evaluation. Yearly RAPs will likewise be prepared with direct participation of WMOs and landowners in process tasks like census, determination of replacement value/market prices of affected assets, and implementation and monitoring of the mitigation measures.

**E. Safeguards Classification (select one)**

S<sub>1</sub>. –The project has significant, cumulative and/or irreversible impacts; where there are significant potential impacts related to several safeguard policies.

S<sub>2</sub>. – One or more safeguard policies are triggered, but effects are limited to their impact and are technically and institutionally manageable.

S<sub>3</sub>. – No safeguard issues

S<sub>F</sub>. – Financial intermediary projects

**F. Disclosure Requirements**

	Date
<i>Environmental Assessment/Audit/Management Plan/Other:</i>	
Date of receipt by the Bank	02/07/2004
Date of “in-country” disclosure	02/08/2004
Date of submission to InfoShop	02/09/2004
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	
<b>Not Applicable</b>	
<i>Resettlement Action Plan/Framework/Policy Process:</i>	
Date of receipt by the Bank	02/07/2004
Date of “in-country” disclosure	02/08/2004
Date of submission to InfoShop	02/09/2004
<i>Indigenous Peoples Development Plan/Framework:</i>	
Date of receipt by the Bank	Not Applicable
Date of “in-country” disclosure	Not Applicable
Date of submission to InfoShop	Not Applicable
<i>Pest Management Plan:</i>	
Date of receipt by the Bank	Not Applicable
Date of “in-country” disclosure	Not Applicable
Date of submission to InfoShop	Not Applicable
<i>Dam Safety Management Plan:</i>	
Date of receipt by the Bank	Not Applicable
Date of “in-country” disclosure	Not Applicable
Date of submission to InfoShop	Not Applicable
If in-country disclosure of any of the above documents is not expected, please explain why.	

**Section III – Compliance Monitoring Indicators at the Corporate Level**

<i>OP/BP 4.01 - Environment Assessment:</i>	Yes	No
Does the project require a stand-alone EA (including EMP) report?	Yes	
If yes, then did the Regional Environment Unit review and approve the EA report?	Yes	
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes	

<b><i>OP/BP 4.04 - Natural Habitats:</i></b>	<u>Yes</u>	<u>No</u>
Would the project result in any significant conversion or degradation of critical natural habitats?		No
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?		
<b><i>OP 4.09 - Pest Management:</i></b>	<u>Yes</u>	<u>No</u>
Does the EA adequately address the pest management issues?	Yes	
Is a separate PMP required?		
If yes, are PMP requirements included in project design?		
<b><i>Draft OP 4.11 (OPN 11.03) - Cultural Property:</i></b>	<u>Not applicable</u>	
Does the EA include adequate measures?		
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on physical cultural resources?		
<b><i>OD 4.20 - Indigenous Peoples:</i></b>	<u>Not Applicable</u>	
Has a separate indigenous people development plan been prepared in consultation with the Indigenous People?		
If yes, then did the Regional Social Development Unit review and approve the plan?		
If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit?		
<b><i>OP/BP 4.12 - Involuntary Resettlement:</i></b>	<u>Yes</u>	<u>No</u>
Has a resettlement action plan, policy framework or policy process been prepared?	Yes	
If yes, then did the Regional Social Development Unit review and approve the plan / policy framework / policy process?	Yes	
<b><i>OP/BP 4.36 – Forests:</i></b>	<u>Not Applicable</u>	
Has the sector-wide analysis of policy and institutional issues and constraints been carried out?		
Does the project design include satisfactory measures to overcome these constraints?		
Does the project finance commercial harvesting, and if so, does it include provisions for certification system?		
<b><i>OP/BP 4.37 - Safety of Dams:</i></b>	<u>Not Applicable</u>	
Have dam safety plans been prepared?		
Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?		
Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?		

<b>OP 7.50 - Projects on International Waterways:</b>		<u>Yes</u>	<u>No</u>
Have the other riparians been notified of the project?			No
If the project falls under one of the exceptions to the notification requirement, then has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?		Yes	
What are the reasons for the exception?			
Please explain: Rehabilitation/improvement of existing FCD/FCDI schemes only			
Has the RVP approved such an exception?		Yes	
<b>OP 7.60 - Projects in Disputed Areas:</b>		<u>Not applicable</u>	
Has the memo conveying all pertinent information on the international aspects of the project, including the procedures to be followed, and the recommendations for dealing with the issue, been prepared, cleared with the Legal Department and sent to the RVP?			
Does the PAD/MOP include the standard disclaimer referred to in the OP?			
<b>BP 17.50 - Public Disclosure:</b>		<u>Yes</u>	<u>No</u>
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?		Yes	
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?		Yes	
<b>All Safeguard Policies:</b>		<u>Yes</u>	<u>No</u>
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of the safeguard measures?		Yes	
Have safeguard measures costs been included in project cost?		Yes	
Will the safeguard measures costs be funded as part of project implementation?		Yes	
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures?		Yes	
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?		Yes	
<b>Signed and submitted by:</b>		<u>Name</u>	<u>Date</u>
Task Team Leader:	Mohinder S. Mudahar		April 25, 2004
Project Safeguards Specialist 1:	T. K. Barua		April 25, 2004
Project Safeguards Specialist 2:	Yuka Makino		April 25, 2004
Project Safeguards Specialist 3:	Shankar Narayanan		April 25, 2004
<b>Approved by:</b>		<u>Name</u>	<u>Date</u>
Regional Safeguards Coordinator:	Eric Brusberg		04/26/04
Comments:			
Sector Manager:	Gajanan Pathmanathan		04/26/04
Comments:			