



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

Appraisal Stage | Date Prepared/Updated: 04-Nov-2019 | Report No: PIDISDSA26829



BASIC INFORMATION

A. Basic Project Data

Country Ghana	Project ID P166996	Project Name Ghana Jobs and Skills Project	Parent Project ID (if any)
Region AFRICA	Estimated Appraisal Date 20-Sep-2019	Estimated Board Date 10-Dec-2019	Practice Area (Lead) Social Protection & Jobs
Financing Instrument Investment Project Financing	Borrower(s) Republic of Ghana	Implementing Agency Ministry of Finance, Ministry of Employment and Labor Relations, Council for Technical and Vocational Education and Training, National Board for Small Scale Industries, Ministry of Environment, Science, Technology and Innovation	

Proposed Development Objective(s)

The Development Objective is to support skills development and job creation in Ghana

Components

Component 1: Provision of Apprenticeship Training for Jobs

Component 2: Provision of Entrepreneurship and Small and Micro Enterprise Support for Jobs

Component 3: Operationalization of the Ghana LMIS, Upgrading of District Public Employment Centers and Services, and Independent Reviews of Government Youth Employment & Skills Development Programs

Component 4: Capacity Development, Technical Assistance, and Project Management Support for Enhanced Skills and Jobs Impact

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	200.00
Total Financing	200.00
of which IBRD/IDA	200.00



Financing Gap	0.00
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DETAILS

World Bank Group Financing

International Development Association (IDA)	200.00
IDA Credit	200.00

Environmental Assessment Category

B-Partial Assessment

Decision

The review did authorize the team to appraise and negotiate

Other Decision (as needed)

B. Introduction and Context

Country Context

1. The Republic of Ghana, with a population of about 30 million, is classified as lower-middle-income with a per capita income of US\$4,212 (in 2011 PPP dollars) in 2018. Ghana achieved its current income status through strong, sustained economic growth. The country’s per capita national income grew by an average of 4.8 percent per year between 1993 and 2005, by 7.7 percent per year between 2005 and 2012 (peaking at 14.4 percent in 2011), and by 5.6 percent between 2012 and 2016. Ghana’s economic growth performance during the 2000s is mainly attributed to the sharp increase in prices for its main commodity exports, cocoa and gold, and the start of commercial oil and gas production in 2011.

2. The country’s favorable economic growth performance has been accompanied by a substantial reduction in the prevalence of poverty. Based on the national food poverty line, the extreme poverty rate fell from 36 percent in 1991/92 to 16.5 percent in 2005/06 to 8.4 percent in 2012/13, allowing Ghana to meet the United Nations Millennium Development Goal of halving poverty by 2015. Its current extreme poverty rate, measured in 2016/17, is 8.2 percent. In terms of micro determinants, the reduction in poverty is found to be associated with increases in employment, agricultural income, access to electricity, education attainment, and rainfall. It is also associated with a shift in employment from agriculture to industry and services.

3. Ghana’s poverty reduction story is however not without some concern, in three respects. First,



the pace of poverty reduction has slowed over time. Second, the association between economic growth and poverty reduction has weakened over time. Third, the poverty reduction record varies substantially by the country's regions, corresponding with spatial differences in economic activity and output. In some regions, poverty rates have remained persistently high.

4. The inequality and shared prosperity picture also exhibits some concern. Income inequality in Ghana has risen over the 1990s and 2000s, driven by poorer regions in the country. Measured in 2016/17, Ghana has a Gini index value of income of 0.43 and the poorest 40 percent of the country's population receive 26 percent of national income. Consistent with rising income inequality, growth in average consumption spending of the country's total population was higher than for the poorest 40 percent of the population over the 1990s and 2000s. These trends suggest that Ghana's gains in prosperity have not been progressive.

5. To raise and sustain its economic growth performance, the country would need to (i) increase private investment and productivity; (ii) have stronger macroeconomic policy management, which includes increased domestic revenue mobilization and improved public debt management; and (iii) protect against possible volatility in its economic growth, which, in the past, has been mainly driven by fluctuations in global commodity prices and by increased public spending tied to election cycles.

6. Stronger future performance in poverty reduction and shared prosperity gains would require (i) diversifying the economy (away from natural resources and commodities), (ii) raising labor productivity (overall labor productivity growth has changed little over time), and (iii) providing improved jobs to poorer households.

Sectoral and Institutional Context

7. Ghana's labor force has been expanding rapidly, from 6.5 million in 1993 to 12.1 million in 2017 and it is expected to continue to grow. The sectoral distribution of national income has shifted from agriculture to mainly services. Accompanying this trend, the country's sectoral distribution of employment has also shifted from agriculture to mainly services. Today, services dominate in terms of their contribution to national income and employment. Measured in 2017, agriculture, industry, and services accounted for 18.3 percent, 25.5 percent, and 56.2 percent of national income, respectively. Similarly, in 2016, agriculture, industry, and services accounted for 41 percent, 14 percent, and 45 percent of total employment, respectively. The value-added per worker is currently twice as high in services than in agriculture, but the productivity levels in these two sectors have stagnated over the 2000s. Value-added per worker in industry has increased over time and is now 50 percent higher than in services. All these trends are driven in part by a dramatic shift in the population distribution toward urban areas.

8. Ghana's labor market shows signs of weakness. Youth, officially defined in the country as individuals ages 15-35, are characterized by low secondary school completion rates; high unemployment rates, particularly among women, urban youth, and poorer individuals (i.e., individuals in the poorest 40 percent of consumption spending); and high rates of time-based underemployment, particularly in rural areas and among poorer individuals. Those in the poorest 40 percent and in rural areas are more likely to



be engaged in agriculture whereas women are more likely to be engaged in industry than men. The type of jobs also varies between urban and rural areas. Informal sector jobs and agribusiness account for 61.5 percent and 18.7 percent in urban areas, respectively; while in rural areas they account for 23.3 percent and 72.1 percent, respectively. Public sector jobs constitute 5.9 percent of jobs and are found mostly in urban areas.

9. The vast majority of Ghanaians are self-employed. In 2016/17, 84 percent of the working-age population and 85 percent of youth were self-employed. Among the poorest 40 percent of the population, the rate of self-employment is even higher, at 95 percent. The positive association between self-employment status and poverty status indicates that these activities are often not productive and gainful enough to lift individuals out of poverty. While the population is shifting over time from agriculture to industry and services (the share in agriculture fell from 57 percent in 1991 to 34 percent in 2018), the shift in the population from self-employment to wage employment has been less than commensurate. Additionally, most of the growth in wage employment over time has been primarily in low-wage employment. Improving the economic circumstances of the typical Ghanaian will require focusing on individuals with lower levels of education in disadvantaged labor market statuses such as labor market discouragement, unemployment, time-based underemployment, and self- or wage employment with low earnings. Developing the skills of such individuals and helping them engage in more productive, more gainful employment would be the most direct way of reducing poverty and boosting shared prosperity in the country.

10. The labor market for youth is also characterized by gender and geographic disparities. Women and rural residents have lower secondary school completion rates. Less than 12 percent of women are in wage employment, compared to 20 percent for men. Overall, whether self- or wage employed, women tend to work in income-generating activities with lower labor productivity and earn less than men. Reflecting the country's spatial distribution of poverty, more than half of wage workers in formal enterprises are in Accra and larger urban areas.

11. Traditional apprenticeship training is a major source of skill acquisition, especially for youth who have low levels of education and come from poorer households. In 2016/17, the participation rate in apprenticeship training was 27 percent, and the average length of training was 2.5 years. Eighty-five percent of apprenticeship training participants had less than nine years of schooling, and thirty-five percent came from the poorest 40 percent of the population. In comparison, the participation rate in TVET programs (that is, the formal TVET sector) was much lower, at 17 percent. In addition, ninety-five percent of TVET program participants had more than nine years of education (as expected given education completion requirements for TVET program participation), and eighty-four percent came from the richest 60 percent.

12. The predominance of low-productivity employment activities stems partly from a substantial proportion of youth going through low-quality informal apprenticeship training. Close to half a million people are engaged in informal apprenticeship training, compared to 40 thousand people in the formal TVET system. Most people trained in informal apprenticeships do not benefit from quality training. Informal apprentices depend on the limited knowledge and willingness of the master craft person to train and are limited in their learning by the narrow range of services that the master craft person provides.



13. Despite the poor quality of existing informal apprenticeship training, families seem nevertheless to value apprenticeships, as indicated by families and/or apprentices usually paying a fee to the master craft person in exchange for on-the-job training. Given the large number of youth entering into apprenticeship training agreements each year, improved apprenticeship training can lead to appreciable gains for both apprentices and training enterprises. International best practice suggests that the quality of the training can be improved by covering both apprentices and training enterprises. The knowledge of master craft persons should be upgraded and certified; a dual training system combining on-the-job training with classroom training should be introduced to allow the apprentice to acquire trade-specific vocational and socioemotional skills; the skills of apprentices should be certified; and training providers in the process should be accredited. The whole process should ensure that incentives of apprentices, master craft persons, and training providers are aligned, and that training is provided in accordance with standards.

14. Weak support systems for entrepreneurship and small business development also contribute to poor labor market outcomes in Ghana. In addition to low skill levels, youth face higher barriers to self-employment stemming from their lack of access to finance, land, social networks, and other factors compared to older adults. There are also intermediation constraints related to the lack of relevant, up-to-date, and actionable labor market information. According to the 2015 Ghana Labor Force Survey, internet-based and other intermediation tools are barely used by job seekers. Among people who actively searched for work, more than two-fifths contacted friends and relatives for information. Fewer than 5 percent of respondents indicated that they searched the internet or newspaper advertisements or used formal employment services. The MELR is developing a LMIS that would provide the needed information on labor market conditions, including on job seekers and job opportunities, with the potential to serve as the primary basis for improved job intermediation services. The first phase of the development of the Ghana LMIS (or GLMIS) has been completed with the basic software in place. District PECs managed by MELR, have a key role to play in gathering and inputting the needed labor market information into the GLMIS as well as in providing job connection services. The PECs are however in poor condition in terms of infrastructure and resources and their staff are oriented towards labor inspections instead of labor market information and job connection services.

15. The Government Strategy for Technical and Vocational Education and Training Transformation sets out the landscape for formal and informal sector skill training in Ghana. The strategy developed by COTVET and the MOE identifies key challenges confronting skill training, which include poor linkages between training providers and industry, fragmentation and poor coordination among multiple delivery agencies, multiplicity of parallel standards, inadequate testing and certification, low quality of instruction, and poor perception of skill training. COTVET's five-year strategic plan (2018-2023) aims to improve access, quality, financing, and coordination of skill training. A key element in the plan for financing skill training in private enterprises is the SDF which currently exists as a development partner funded operation. The government aims to situate the SDF within a legal framework to ensure sustainability with funding contributions from the private sector and government.

16. Almost all youth employment programs in the country contain some form of entrepreneurship training. The Student Entrepreneurship Business Model, initiated by COTVET, aims at enhancing professional and entrepreneurship skills for TVET students. There are 13 TVET institutions currently administering this training. The Graduate Entrepreneurial Business Support Scheme, under MELR,



operates a public-private partnership modality and aims at supporting graduates to successfully enter self-employment. Finally, a wide range of entrepreneurship training programs are administered by the NBSSI. NBSSI, enacted in 1981 and operationalized in 1985, is the apex governmental body for the promotion and development of the micro and small enterprise sector in Ghana. The government views the sector as having the potential to contribute substantially to improving labor outcomes and economic productivity and growth.

17. Recently, the government launched the *Coordinated Programme of Economic and Social Development Policies (2017-2024): An Agenda for Jobs: Creating Prosperity and Equal Opportunity for All*, which emphasizes the need for greater creation of jobs that are gainful and productive. Other more specific policies introduced by the government in the past decade to address poor labor market circumstances include the National Employment Policy and the National Youth policy; as well as the development of acts to legalize certain agencies such as the Youth Employment Agency and National Youth Authority. These agencies are mandated to formulate policies and implement programs that promote youth development and the effective participation of the youth in the economic development of the country.

18. The government continues to invest heavily in several employment programs, with the majority focusing on youth. An inventory of youth employment programs in Ghana compiled in 2016 by the World Bank revealed 40 major youth employment programs, of which 18 programs are implemented by the government. These youth employment programs focus on TVET training, entrepreneurship training, apprenticeship training, employment services, and direct employment. Initial reviews of government youth employment and skills development programs, including the World Bank, raise concern about their performance and impact.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

19. The Development Objective is to support skills development and job creation in Ghana.

Key Results

- (a) *Indicator #1*: Percentage of apprenticeship training program participants that complete the program and have jobs at least six months after completion
- (b) *Indicator #2*: Percentage of entrepreneurship program participants that complete the program and have jobs at least six months after completion
- (c) *Indicator #3*: Percentage of grant-receiving private enterprises that have increased workforces at least six months after the completion of grant support
- (d) *Indicator #4*: Number of upgraded Public Employment Centers that provide improved job connection services



D. Project Description

20. The project supports the government's prioritized skills development and job creation agenda, through four components:

- a. Component 1: Provision of Apprenticeship Training for Jobs
- b. Component 2: Provision of Entrepreneurship and Small and Micro Enterprise (SME) Support for Jobs
 - i. Sub-Component 2.1: Provision of Entrepreneurship Training and Competitive Business Start-Up Grants
 - ii. Sub-Component 2.2: Provision of Competitive Grants to Private Enterprises for Expanded Employment
- c. Component 3: Operationalization of the Ghana Labor Market Information System, Upgrading of District Public Employment Centers and Services, and Independent Performance Reviews of Selected Government Youth Employment and Skills Development Programs
 - i. Sub-Component 3.1: Full Development and Operationalization of the Ghana Labor Market Information System
 - ii. Sub-Component 3.2: Upgradation of District Public Employment Centers and Provision of Improved Job Connection and Labor Market Information Services to Job Seekers and Employers
 - iii. Sub-Component 3.3: Independent Performance Reviews of, and Technical Assistance for, Reforming Selected Government Youth Employment and Skills Development Programs
- d. Component 4: Capacity Development, Technical Assistance, and Project Management Support to Coordinating, Implementing, and Partnering Agencies for Enhanced Skills and Jobs Impact
 - i. Sub-Component 4.1: Capacity Development and Technical Assistance
 - ii. Sub-Component 4.2: Project Management Support

21. The primary target groups for the project are:

- (a) Individuals seeking skills and jobs
- (b) Master craft persons
- (c) Cooperatives and associations
- (d) Private enterprises and their workforces
- (e) Public and private training providers
- (f) Council for Technical and Vocational Education and Training (COTVET); Ministry of Employment and Labor Relations (MELR); Ministry of Environment, Science, Technology, and Innovation (MESTI); and National Board for Small Scale Industries (NBSSI) (NBSSI)/Ministry of Trade and Industry (MOTI).

E. Implementation

Institutional and Implementation Arrangements



22. The project is multi-sectoral, with multiple ministries and agencies partnering on project activities. This necessitates an encompassing arrangement, with a nodal authority. The overall institutional arrangements for coordinating, overseeing, and managing project activities comprise (i) a Project Inter-Ministerial Oversight Committee, (ii) a Project Coordinating Unit, (iii) a Project Technical Committee, and (iv) implementing and partnering agencies. The government sees this arrangement as efficient and pragmatic, and as providing for due diligence.

23. *Project Inter-Ministerial Oversight Committee:* The primary function of the committee would be to (i) review project status, progress, and performance, (ii) help ensure inter-ministry and inter-agency cooperation, and (iii) resolve any outstanding project implementation issues. Members of the committee would comprise of the Ministers of Education; Employment and Labor Relations; Environment, Science, Technology, and Innovation; Finance; and Trade and Industry.

24. *Project Coordinating Unit:* The primary functions of the unit will be to (i) convene and support oversight committee meetings; (ii) prepare consolidated project status, progress, and performance reports for the oversight committee and the World Bank; (iii) coordinate across implementing and partnering ministries and agencies; and (iv) undertake due diligence and ensure quality assurance of, and accountability for, project implementation, including of financial management, procurement, and safeguards. The coordinating unit will be managed by the Ministry of Finance.

25. *Project Technical Committee:* This committee will be composed of officials from all coordinating, implementing, partnering agencies, COTVET, MELR, MESTI, MOF, and NBSSI. The main function of this committee will be to supervise and advise on technical aspects of project implementation.

26. *Project Implementing and Partnering Agencies:* The main implementing agencies are COTVET, NBSSI, and MELR. The main partnering agency is MESTI. Implementing agencies will be primarily responsible for implementation of project activities that fall under their respective purviews, comprising all elements including financial management, procurement, safeguards, monitoring and evaluation, capacity development and technical assistance, and research and analysis.

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

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

Specific project locations are yet to be determined



G. Environmental and Social Safeguards Specialists on the Team

Edward Felix Dwumfour, Environmental Specialist
Franklin Kuma Kwasi Gavu, Environmental Specialist
Alidu Babatu Adam, Social Specialist
Justice Odoiquaye Odoi, Environmental Specialist
Sarah Antwi Boasiako, Social Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>The category for this project is a “B”. OP 4.01 was triggered to address the potential risks and impacts from the following activities: (i) provision of competitive business start-up capital grants to individuals that receive entrepreneurship training under sub-component 2.1; (ii) provision of competitive grants to private enterprises under sub-component 2.2; (iii) installation of information and communication technology for the Ghana Labor Market Information System at Public Employment Centers, other relevant local centers, and relevant ministries and agencies under project component 3.1, and (iv) upgradation of selected Public Employment Centers under sub-component 3.2. An Environmental and Social Management Framework (ESMF) was prepared and disclosed in-country and the infoshop for the attention of the public. The ESMF sets out the principles, rules, guidelines and procedures for the implementation of such sub-projects. The World Bank Group EHS guidelines have also been incorporated in the ESMF to provide guidance for health and safety issues for the refurbishment activities.</p>



Performance Standards for Private Sector Activities OP/BP 4.03	No	
Natural Habitats OP/BP 4.04	No	Refurbishment of existing infrastructure will not have adverse impact on the natural habitat.
Forests OP/BP 4.36	No	Refurbishment of existing infrastructure will not be undertaken within protected forest reserves.
Pest Management OP 4.09	No	Project will not support any activities involving the use or procurement of pesticides.
Physical Cultural Resources OP/BP 4.11	No	Refurbishment of existing infrastructure will not involve excavations or physical cultural resources
Indigenous Peoples OP/BP 4.10	No	No indigenous people as defined by the Bank in Ghana.
Involuntary Resettlement OP/BP 4.12	No	Expected refurbishment activities will only involve existing infrastructure
Safety of Dams OP/BP 4.37	No	The project activities do not involve dams.
Projects on International Waterways OP/BP 7.50	No	The project will not occur on international waterways.
Projects in Disputed Areas OP/BP 7.60	No	The project will not occur in disputed areas.

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

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

The proposed project is classified as Category B (partial assessment) since it involves: (i) provision of competitive business start-up capital grants to individuals that receive entrepreneurship training under sub-component 2.1; (ii) provision of competitive grants to private enterprises under sub-component 2.2; (iii) installation of information and communication technology for the Ghana Labor Market Information System at Public Employment Centers, other relevant local centers, and relevant ministries and agencies under project component 3.1, and (iv) upgradation of selected Public Employment Centers under sub-component 3.2.

Potential environmental risks and impacts may include noise nuisance, dust from works, health and safety of workers and the public, visual intrusion, as well as generation and disposal of solid waste. As a result, the Environmental Assessment OP/BP 4.01 policy was triggered to provide the appropriate guidelines for the assessment and management of environmental impacts. On social issues, the project is expected to generate positive outcomes by enhancing skill sets of trainees and apprentices, increasing the competitiveness of entrepreneurs through grants, and creating jobs. Compulsory land acquisition and involuntary resettlement are not expected because investments are limited to land owned by beneficiary institutions and grant awardees and free of incumbrances. Potential social risks may include the tendency to undertake limited consultation and exclusion of vulnerable groups from project benefits. To address these risks, the borrower has prepared a stakeholder engagement plan to ensure adequate information sharing and engagement of relevant stakeholders.



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

The proposed project activities may not have any indirect and/or long-term impacts because the environmental and social screening process as outlined in the ESMF will enable sub-project implementers to identify, assess, mitigate, and monitor potential adverse environmental and social impacts.

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

Analysis of alternatives will be conducted as part of the sub-project environmental and social impact screening during project implementation. The project's approach will always seek to prevent, avoid, minimize, and mitigate any adverse impacts. The alternatives to be considered will include the location of the Public Employment Centers identified, rehabilitation procedures, source of building materials, energy and water consumption. Sub-projects requiring land acquisition and displacement are not eligible for support.

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

To ensure that the project is implemented in an environmentally and socially sustainable manner, the borrower has prepared and disclosed an ESMF. The ESMF provides guidance and procedures for environmental and social due diligence, impact assessments, and mitigation planning once the sub-project activities have been confirmed and Public Employment Centers identified during implementation. The ESMF includes tools for conducting environmental and social screening for each sub-project activity to determine specific risks mitigation instruments that may be relevant for addressing notable risks. The borrower is mandated to prepare, publicly disclose, and implement sub-project level Environmental and Social Impact Assessments and Environmental and Social Management Plans as needed prior to commencement of any civil works.

To ensure effective implementation of the ESMF, the project will recruit and train among other expertise, substantive environmental and social safeguards specialists at the Council for Technical and Vocational Education and Training and the Ministry of Employment and Labor Relations, to be supported by safeguards focal persons at the Ministry of Environment, Science, Technology, and Innovation and the National Board for Small Scale Industries. The project will also benefit from the Ghana Environment Protection Agency with offices in Accra and in the original 10 regional capitals.

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

The ESMF was prepared in compliance with both national regulations and Bank safeguard policies with a broad participatory consultation process with all relevant stakeholder groups. The national consultations involved meetings with officials of the Ministry of Finance; Ministry of Employment and Labor Relations; Council for Technical and Vocational Education and Training; National Board for Small Scale Industries; and the Ministry for Environment, Science, Technology, and Innovation.

The local consultations included meetings with officials of selected Public Employment Centers, Training Coordinators, Master Crafts Persons of the Association of Garages and Ghana Cooperative Fashion Designers Association, both under the Ghana TVET Voucher Project. Ahead of appraisal, the borrower and the Bank consulted the Ghana Federation of Disability Associations to disclose critical information about the potential benefits and impacts of the project. The borrower has also developed a Stakeholder Engagement Plan and will roll out a Grievance Redress Mechanism to ensure consultation occurs throughout the project life. The ESMF was disclosed in Ghana on July 12, 2019.



B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank 12-Jul-2019	Date of submission for disclosure 12-Jul-2019	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
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"In country" Disclosure

Ghana
12-Jul-2019
Comments

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

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?
No

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?
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



All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

Yes

Have costs related to safeguard policy measures been included in the project cost?

Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

Yes

CONTACT POINT

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APPROVAL

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Approved By

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Country Director:	Agata Pawlowska	05-Nov-2019

