

Georgia: Nenskra HPP

REQUEST NUMBER:



Project
Complaint
Mechanism

Compliance Review Management Action Plan Final 5 August 2020

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1. Management Response

Management welcomes the Nenskra HPP PCM Compliance Review Report and appreciates the opportunity to set out a number of actions to address the recommendations in this Management Action Plan (MAP). The report is timely as, at the time of MAP issue, project construction is yet to commence and so there is sufficient opportunity to implement project-related actions to further mitigate the risks of the project and strengthen the positive outcomes.

Management's understanding of the thrust of the PCM Compliance Review Report is that EBRD's Performance Requirement 7 (PR7) on Indigenous Peoples under the 2014 Environment and Social Policy (ESP) lacked clear guidance for clients on the process necessary to ensure the appropriate assessment of PR7 eligibility criteria. Therefore, the Review found that the method and process applied by the Project for assessing PR7 applicability to local people living in the project region were non-compliant with Good International Practice (GIP).

Management welcomes the clear assertion by the PCM Compliance Review that the findings of non-compliance relate to the process followed in assessing the applicability of PR7, rather than the outcome of the assessment itself. Management also appreciates that the PR7 applicability assessment was acknowledged to be the first of its kind in Georgia not only for EBRD but for all other IFIs and set new standards in response to concerns raised by project stakeholders.

Management would like to take this opportunity to re-emphasise that whether or not the Svan should be considered as an indigenous people has not been raised as an issue prior to the Nenskra project by any parties within or outside Georgia. Hitherto, PR7 has not been considered as applicable in any EBRD COOs - other than in the Russian Federation. The PR7 applicability assessment completed as part of the Project ESIA therefore already surpassed usual operating practices.

As demonstrated by the Environmental and Social Impact Assessment process, and the subsequent complaint, PR7 applicability is an issue of utmost sensitivity and has been untested in Georgia until now. The recommendations made by the PCM Compliance Review require the collaboration and agreement of third-parties and Management will endeavour to facilitate those discussions in order to achieve the desired outcomes of the PCM recommendations. Management has appointed an independent expert to provide specialist advice on how to best progress these elements of the recommendations to achieve the required results.

Management notes that EBRD's revised ESP issued in 2019 includes substantial updates to PR7 (along with the remaining PRs). In addition, a Guidance Note on 2019 PR7 has been drafted and will be finalised upon acceptance of this MAP by EBRD's Board of Directors. Additional internal good practice documents and procedures are being prepared on other issues raised as part of this PCM including gender, cultural heritage and stakeholder engagement to assist in the implementation of the proposed actions in this MAP. These demonstrate substantial progress when addressing the central themes of the complaint and the resulting Compliance Review recommendations.

Management has detailed a number of actions in this MAP to address the recommendations in the PCM compliance report focussing on practical ways in which the intent and desired outcomes of the recommendations can be achieved. Management is pleased to confirm that many of the MAP actions are already in progress and can be closed upon finalisation of this PCM Compliance Review process or within the first monitoring period. Several of the MAP action items can only be completed after financing agreement has been agreed with the company and these have been indicated accordingly; at the time of MAP preparation, the loan agreement has not yet been signed.

EBRD is committed to working closely with our project partners, co-lenders and other project stakeholders to endeavour to address the PCM recommendations in a timely manner.

This is the Final version of the MAP, which was amended based on feedback received at EBRD Audit Committee of 16 July 2020 and during the no objection approval period from the Board of Directors.

2. Management Action Plan

Actions to address the Recommendations to Address EBRD Non-compliance at the Systemic and Procedural Levels

PCM Recommendation 1

Establish a systemic tracking tool for EBRD requests to Clients, allowing Bank Management to better ensure that Project-specific requests in relation to ESP adherence are effectively implemented.

Management Comment on Recommendation 1

Previously, during review of ESIA's and when undertaking client and project appraisals, EBRD has tracked reviews, coordinated comments on behalf of all Lenders, and monitored implementation of covenants and agreed actions through independent Lenders' Environmental and Social Consultants. It monitored closure through a formal action tracker and has utilised a number of different tools which have varied from project to project, such as spreadsheets, documents, data-rooms and other. The PCM Compliance Review has concluded that this process was not suitably robust during the Nenskra project appraisal and EBRD will therefore take ownership of this element of project appraisals to ensure consistent approaches.

Management Action 1

- (i) Develop and implement a systemic tracking system for EBRD requests to clients, allowing the Bank to ensure that Project-specific requests regarding ESP adherence be implemented in a timely manner. This system will be included within ESD's Assurance Framework and will be used for all Category A projects to allow recording, tracking and closure of review comments provided to clients.

Deadline: The tool has been developed for Category A projects and will be adopted with immediate effect. This item is closed and status update on use of this new mechanism will be provided within the first reporting period.

PCM Recommendation 2

Develop clear, step-by-step policy Guidance to direct Clients in the effective assessment of the ESP PR7 Indigenous Peoples eligibility criteria (for the 2014 ESP as well as other ESP iterations). The Guidance should be developed through a participatory process - involving multiple recognised Indigenous Peoples experts, and CSO and industry representatives - and should be informed by GIP employed by both IFIs and the private sector. This Guidance should include (i) specific recommendations from GIP methodologies that ensure PR7 eligibility criteria are robustly assessed; and (ii) specific processes and measures to guide Clients in the application of PR7 in instances where indigeneity is not recognised at the national level.

In particular, the Guidance needs to:

- (i) outline specific GIP methodologies that clients are expected to use in order to ensure that the PR7 eligibility criteria are robustly assessed. In all EBRD projects where issues of indigeneity could be relevant, Bank Management should expect clients to adhere to IFI GIP (outlined in Section 4.1.3), demonstrating they have:

- sought to gather best possible information in assessing whether a group qualifies for consideration as an indigenous people, from multiple experts with a range of relevant expertise, coupled with
 - consulted the pertinent groups themselves around the applicability of the various PR7 criteria.
- (ii) outline specific processes and measures to guide clients in applying PR7 in instances where indigeneity is not recognised at the national level, in a manner that fulfils the Bank's 2014 ESP (or the relevant ESP) commitments and assists clients in mitigating potential risks associated with such inquiries.

Management Comment on Recommendation 2

As indicated in the introductory sections of this MAP, PR7 on Indigenous Peoples has been implemented on very few projects historically and never before on projects located elsewhere than in the Russian Federation. While EBRD went beyond standard practice in the case of Nenskra HPP project by requesting the Client to undertake a PR7 applicability assessment as part of the Social Impact Assessment, the Compliance Review has concluded that this applicability assessment was not sufficiently robust. In particular, the Compliance Review found that project affected people should have been specifically engaged in the process of assessing the validity of PR7 applicability criteria rather than consulted on the outcomes of the assessment after the analysis had been completed.

Management welcomes the clarification that this finding relates to the process that was followed rather than the outcome of the assessment itself. In addition, Management acknowledges that, in the absence of a detailed guidance, PR7 could be interpreted in more than one way by EBRD clients. In addition, accommodating differences between policy requirements of each Lender in the ESIA documentation was a complex process for the Client. This has been made clear in the different conclusions reached by Compliance Reviews undertaken for three lenders (ADB, EIB and EBRD) involved in the project.

PR7 has been updated in the 2019 ESP in line with relevant comments received during the consultation process for both the Nenskra HPP project and the 2019 ESP review. In addition, it was recognised that a PR7 Guidance Note would be required in light of the 2019 update and that it would need to incorporate the findings from the Nenskra project appraisal and subsequent PCM compliance review.

Management has appointed an IP specialist to assist with the development and completion of a PR7 Guidance Note, and the development of the note has been largely completed. This EBRD PR7 Guidance Note is based on a thorough review of current GIP as ascertained through international protocols, MDB Indigenous Peoples policies and guidance, and industry and sectoral guidance. The development of the guidance note also involved extensive consultation with social development specialists in NGOs, MDBs, and the private sector as well as indigenous peoples representatives.

Specific areas of focus in the review and finalisation of the guidance note stemming from the compliance review report include:

- (i) Outlining specific methodologies for PR7 applicability assessment based on GIP;
- (ii) Outlining specific processes and measures to guide clients in applying PR7 in instances where indigeneity is not recognised at national level; and
- (iii) Employing a participatory process involving multiple IP experts, CSOs and industry representatives.

While the present draft Guidance Note covers each of these subjects, it will be thoroughly reviewed and strengthened, where necessary, to fully address these and other recommendations from the compliance review.

Management Action 2

- (i) Undertake a gap analysis of the revised PR7 in the 2019 ESP and the new PR7 Guidance Note, currently under preparation, in light of this recommendation to ensure all elements are included. Finalise and publish the PR7 Guidance Note.

Deadline: The Guidance Note will be provided to EBRD Board of Directors for review and will subsequently be disclosed. This action item is in progress and will be closed within the first monitoring period.

PCM Recommendation 3

Where third parties are responsible for Project siting, design and alternatives assessment, consistently require Clients to approach relevant third parties to request that these decision-making processes include environmental and social considerations. Bank Management should document these Bank and Client requests.

Management Comment on Recommendation 3

Frequently EBRD commences the appraisal of a project when alternatives have already been considered and project concept defined – and permitted. While an assessment of alternatives must be included in project ESIA as per PR1 the Compliance Review has concluded that this should be consistently applied and the methodology for project alternative assessments standardised. Management emphasises that this assessment is limited to project level alternatives only and does not extend to a review and comparison of strategic level options and scenarios.

Management proposes to address this recommendation by defining Good International Practice for analysis of alternatives as part of the Environmental and Social Impact Assessment process and making reference to such GIP in all future projects. Management believes that there is sufficient material already in the public domain to make this definition and this will be drawn upon and consolidated for the purposes of the establishment of internal guidance.

Management also commits to transparently disclosing to public and the Board of Directors when the consideration of alternatives has already been completed by the time of the Bank's involvement in the project and the conclusions of the Bank's review of the analysis of alternatives undertaken against GIP.

Management Action 3

- (i) Define Good International Practice for the assessment of alternatives and adopt this as internal guidance as part of ESD's Assurance Framework.
- (ii) Prepare internal guidance for disclosing when the analysis of alternatives has already been undertaken prior to the Bank's involvement in the project and the outcomes of the Bank's review of such an analysis against GIP.

Deadline: these action items are in progress and will be closed within the first monitoring period.

PCM Recommendation 4

Strengthen capacity of the EBRD ESD team on gender issues, and ensure the use of external consultants with strong experience and capabilities in this area.

Management Comment on Recommendation 4

EBRD is fully committed to the incorporation of the full suite of gender assessment requirements throughout its operations as reflected in EBRD's 2019 ESP and associated PRs. These include a strong commitment to adopt measures to effectively assess, prevent and address any form of impacts on gender; including disproportionate impacts and vulnerability due to gender as well as gender-based violence, harassment, abuse, bullying, intimidation, and/or exploitation.

Additional gender-based violence and harassment (GBVH) requirements specific to workers' protection and grievance mechanisms, as well as community safety, effectively result in EBRD's GBVH standards setting current Good International Practice.

EBRD has developed a sound implementation framework to support the need for systematic screening for GBVH-related risks in project appraisals and improved mitigation plans and monitoring, and this has now been adopted across ESD. In addition, during 2019, EBRD co-authored a good practice guidance note for the private sector. Training has been delivered to ESD and other EBRD staff to build capacity for the implementation of the new GBVH-related requirements. The launch of the Good Practice Note and additional training is planned as of the second quarter of 2020.

Furthermore, EBRD is planning to develop an internal guidance note for wider gender issues based on the new policy and PRs to facilitate ESD's assessment of gender related risks and impacts during project appraisal and monitoring processes. Finally, specialist GBVH consultants are now under call-off agreement for ongoing capacity building, training and project related work as required.

Management Action 4

- (i) Gender Based Violence and Harassment identification and management guidance is currently under finalisation and will be disclosed for use by EBRD and clients.

Deadline: The GBVH Guidance will be launched by end June 2020. This action will be closed within the first monitoring period.

- (ii) GBVH risk screening tools have been developed and training on gender based violence and harassment was delivered to ESD staff in 2019. Additional training on GBVH is planned after disclosure of the GBVH Guidance.

Deadline: The action is completed and additional training will be conducted in the second half of 2020 and progress will be reported in the first monitoring period.

- (iii) Internal guidance on wider gender considerations based on 2019 ESP and associated Performance Requirements will be developed and ESD will be trained to assist in addressing gender issues/risks in projects.

Deadline: This task will be completed during the first monitoring period.

Actions to address the Project-specific Recommendations to Address Non-compliance in Project Implementation

PCM Recommendation 5

Take steps to ensure that an expanded assessment of the PR 7 eligibility criteria is conducted for the Nenskra HPP Project, which incorporates all IFI GIP methodologies outlined in the Compliance Review Report, including a) a diversity of views and expertise and b) community consultation regarding each ESP PR 7 eligibility criterion.

Management Comment on Recommendation 5

As indicated under MAP Action Item #2, assessment of applicability of PR7 on Indigenous Peoples has until this point been implemented on very few projects historically and never on projects located outside of the Russian Federation. While EBRD went beyond standard practice in the case of Nenskra HPP project by requesting the Client to undertake a PR7 applicability assessment as part of the Environmental and Social Impact Assessment, and that this assessment was reviewed by multiple independent parties, the Compliance Review has concluded that this applicability assessment was not sufficiently robust. In particular, the Compliance Review found that project affected people should have been specifically engaged in the process of assessing the validity of PR7 applicability criteria rather than consulted on the outcomes of the assessment after the analysis had been completed.

Management has engaged with the Nenskra HPP project team and the wider lender group to commence the process of reassessing the PR7 applicability assessment that was completed as part of the ESIA and the process by which that assessment was undertaken. In addition, Management has appointed an international IP specialist, independent of the project, to advise the EBRD, other lenders and the Client on the implementation of this recommendation.

The re-evaluation of the PR7 applicability assessment will be led by this IP specialist and will take place in two phases:

- Phase One (May, 2020): A desktop study of the sociocultural characteristics of the Svan in the project area utilising the reports already produced and accessing new materials, and
- Phase Two (timing subject to Covid-19 restrictions): A field study enabling the IP specialist to visit the project site in Georgia and engage directly with Project Affected Svan as well as the Client, GoG officials, CSOs, and other critical stakeholders. To carry out the study according to both GIP and PCM recommendations, a second specialist—an ethnographer familiar with Georgian society and culture—will join the IP specialist in the field.

Key steps in the process will include:

Phase One (Desk Study):

- (i) A review of ethnographic data.
- (ii) Interviews with IFI Compliance Review Mechanism experts, Lenders' social staff, the Client's social staff, external experts on Georgian ethnicity.
- (iii) Preparation of an interim note on applicability including identification of areas where more information is required (pending the field study).

Phase Two (Field Study):

- (i) Review of the salience of the Voluntary Principles on Security and Human Rights as a reference to guide the field study and consultation with Client and Lenders' project teams regarding field visit to Tbilisi and project site.
- (ii) Selection of a Georgian ethnographer to pair up with IP specialist to conduct field study.
- (iii) Two experts (and Project and Lender reps as necessary) will meet with Client and Lenders' representatives in Tbilisi.
- (iv) Bank social staff will attend consultation activities with Project-affected people to ensure that they are conducted in line with the Lenders' expectations for meaningful, free consultation.
- (v) Experts will identify and meet with local people, Complainants, CSOs, legitimate representative bodies for the Svan community while maintaining their confidentiality and anonymity, if requested.
- (vi) Consult with Georgian ethnographers regarding IP characteristics and degree of vulnerability of the Svan.
- (vii) Prepare and present a Report on Applicability of PR7 and ESS7 to PCM and Bank Management.

This re-assessment will require coordination, and agreement, with all project stakeholders and particularly the Client, the Project Partners and the Government of Georgia. Furthermore, a broader PR7 applicability assessment may be considered as part of this reassessment – in line with the recommendation of the PCM Compliance Review – for the wider Svan community (beyond the project area) so that a position statement can be developed regarding the application of PR7 to the Svans in a broader context. Depending on the outcome of further discussion with third-parties, Management will continue to engage with the PCM office to provide regular updates and to define the next steps.

Since similar complaints were raised to other Lenders, EBRD will coordinate this work and future-related activities with these Lenders in order to not duplicate efforts and avoid any potential conflicts coming out of separate complaint review processes. EBRD can confirm that relevant stakeholders will be engaged in the preparation of Phase 2 prior to completion of the assessment.

Management Action 5

- (i) Consult with project stakeholders including the project sponsors, project lenders, relevant department of the Government of Georgia and internationally and locally recognised experts in the field to define the appropriate next steps in the context of the project ESIA and the broader content of applicability of PR7 in Svaneti

Deadline for Phase One (Desk Study): this action item is in progress and will be closed within 3 months of the approval of the MAP.

Deadline for Phase Two (Field Study): it is anticipated that this action item will be launched following the completion of Phase 1 and progressed as quickly as possible. It is anticipated that this item will be closed within 24 months of MAP approval, subject to cooperation by all parties and subject to Covid-19 restrictions imposed by national authorities. Management will provide updates to PCM on the implementation of this item as part of the monitoring of the MAP.

PCM Recommendation 6

Address the identified gaps in the Cumulative Impact Assessment (CIA).

Management Comment on Recommendation 6

The Compliance Review has concluded that the method by which the Cumulative Impact Assessment of the Nenskra ESIA had been undertaken is not in line with Good International Practice. Management has engaged with the project Sponsors and their advisors to ensure the uptake of this recommendation. Since the date of the ESIA disclosure, additional studies have been carried out and the relevant chapters of the ESIA can be supplemented, updated and re-disclosed to incorporate these recommendations.

Management Action 6

- (i) Management will continue to engage with the project sponsors and their advisors to ensure that the CIA be updated, and disclosed, to incorporate the recommendations of the PCM Compliance Report.

Deadline: this action item is in progress and will be closed within 12 months after Loan Agreement is signed.

PCM Recommendation 7

Address the identified gaps in the analysis of the Project Alternatives

Management Comment on Recommendation 7

The Compliance Review has concluded that the method by which the alternatives assessment of the Nenskra ESIA (and specifically the project EIA) had been undertaken is not in line with Good International Practice. Management has engaged with the project Sponsors and their advisors to address this item. The results of Management Action Item #3 will be duly considered in the implementation of this item and management emphasises that this assessment will be focused on project level alternatives and does not extend to a review and comparison of strategic level options and scenarios. Equally, the cost/benefit analysis for the project has been progressed on parallel lines and will continue to do so as is appropriate under Good International Practice, rather than included with the environmental and social elements of the alternatives assessment.

Management Action 7

- (i) Management will continue to engage with the project sponsors and their advisors to address the alternatives assessment in parallel with MAP Item #3.

Deadline: this action item is in progress and will be closed within 12 months after MAP approval.

PCM Recommendation 8

Facilitate an additional layer of gender impact assessment to evaluate issues not comprehensively addressed through the Client's environmental and social impact assessment and to ensure the establishment of sufficient mitigation measures.

Management Comment on Recommendation 8

The Project ESIA incorporated the assessment of gender issues throughout the process and engaged women in several rounds of consultation and disclosure activities. The ESIA considers the gender vulnerabilities with regard to employment opportunities; registration and acquisition of customary lands inherited from families; and other potential gender issues such as health and safety, potential gender based violence; harassment risks related to the influx of workers during construction and others are addressed in the various chapters of the ESIA. A broad suite of mitigation measures specific to gender impacts have been specified in resulting management plans. Measures to promote women empowerment were also included such as employment targets and women's representation (25%) in the advisory committee of the Community Investment Program.

The Client has also committed to implement an EBRD supported gender / inclusion Technical Cooperation project to build the capacity of women living the valleys and to develop the capacity of regional institutions providing vocational training for local women (and men) in the long term.

In addition to these public commitments made by the Project on gender, Management acknowledges the PCM Compliance Review recommendation to facilitate an additional layer of gender impact assessment to evaluate issues not comprehensively addressed through the ESIA and to ensure the establishment of sufficient mitigation measures.

Management Action 8

- (i) Implementation of the proposed Technical Cooperation Project is anticipated to address the findings as they pertain to gender and inclusion. The Terms of Reference for the TC project will be shared with the PCM office and will include a two stage approach, the first being the additional layer of gender impact assessment and the second the originally envisaged technical cooperation programme to go beyond compliance with the EBRD's ESP

Deadline: the first stage will be completed within 12 months of MAP approval and the TC project within 24 months after Loan Agreement is signed with the Client (please note that this deadline may be revisited depending on the Covid -19 restrictions).

PCM Recommendation 9

Engage with the Client to address gaps in the Land Acquisition and Livelihood Restoration Plan.

Management Comment on Recommendation 9

Management has engaged with the Client to commence the review and revision of the project Land Acquisition and Livelihood Restoration Plan (LALRP). It is standard practice to refine an LALRP during the project cycle due to design changes, or completion of the detailed design for project facilities, and as new issues emerge and, therefore, the adoption of this recommendation will be included in the routine review of the LALRP implementation arrangements.

Some of the recommendations of the Compliance Review have resulted from nuances between the various Nenskra lender requirements and the LALRP is currently subject to review to ensure the

most stringent requirements across the lender group apply. Management acknowledges that certain elements of the LALRP require further clarification (e.g. 10% livelihood loss as a measure of significance) for external readers and that this can be remedied to remove the ambiguity.

The LALRP and its implementation up to date has been reviewed carefully by Management and it can be confirmed that no project-affected people were or will be unduly affected by the previous wording of the LALRP. As committed in the LALRP, all affected people will receive compensation with full replacement cost for all affected assets. In addition, the borrower has confirmed that all economically displaced will receive livelihood restoration support and all affected *vulnerable people* have the same rights as other affected persons, and are entitled to additional measures regardless of significance level of the impact on their land or income levels.

EBRD can report that the Project has already implemented many of these measures successfully as confirmed by the Independent Advisory Panel during the last monitoring visit in September 2019. Project monitoring has also confirmed that no affected person was disadvantaged during implementation of the above measures as a result of the previous wording of the LALRP.

Management Action 9

- (i) Management will continue to engage with the borrower and their advisors to ensure that the LALRP is updated to incorporate the recommendations of the PCM Compliance Review including deletion of the references made to specific thresholds in the entitlement matrix.

Deadline: this action item is in progress and will be closed within the next monitoring period.

PCM Recommendation 10

Facilitate a further layer of cultural heritage impact assessment, in order to identify potential impacts to the intangible cultural heritage in the Project area not fully reflected in the Client's environmental and social impact assessment, and establish appropriate mitigation measures, in consultation with Project-affected people.

Management Comment on Recommendation 10

Management has engaged with the Client to commence the review of the current cultural heritage impact assessment including intangible cultural heritage.

Management, and the Client, had anticipated that the majority of these requirements would have been adopted by a detailed Cultural Heritage Management Plan to be developed by the EPC contractor to address risks identified for tangible and intangible cultural heritage, in consultation with the relevant authorities and with local people as recommended by the PCM Compliance Review, at the appropriate stage in the project cycle. However, the PCM Compliance Review recommends that this be expedited and that this recommendation be implemented in combination with other recommendations in the PCM Compliance Review. Management will seek to ensure that this will now be undertaken in advance of the development of the EPC management plans, should this MAP be approved before they are developed.

The proposed cultural heritage impact assessment and Management Plan will help design and implement additional projects to support preserving and promoting awareness of local traditions so that intangible cultural heritage and practices are passed on to the next generations in both Nenskra and Nakra valleys.

Management Action 10

- (i) Management will continue to engage with the Client and their advisors to ensure that the cultural heritage impact assessment is updated to incorporate the recommendations of the PCM Compliance Review. The updated assessment will form the basis of the EPC management plans which will be further revised during the early project implementation period.

Deadline: this action item is in progress and disclosed and will be closed within 12 months after MAP approval is signed.

PCM Recommendation 11

Ensure that in accordance with para. 30 of the 2014 ESP, all members of the Client's environmental and social team possess the necessary competencies and abilities to manage the complexities and sensitivities of the Project in a manner consistent with the Bank's environmental and social standards.

Management Comment on Recommendation 11

Management recognises that clients' capacity and capability is essential to the successful implementation of projects. The Client is currently assessing the project team capacity and performance, and has identified key positions to be recruited. The Client will be required to develop an internal training programme for its direct employees and EPC contractor employees on environmental and social commitments of the project.

EBRD will continue to engage with the Client, the project sponsors and the wider lender group to review both the current capacity of the Client and the environmental and social governance structure to ensure that the commitments of the project to all project stakeholders is met in full. Should there be any additions or changes required, these will be implemented immediately by the Client in consultation with EBRD and supervised by the independent consultant.

Management Action 11

- (i) Management has engaged with the Client to undertake an environmental and social governance review and assess the project capacity requirements against the various project commitments to ensure full uptake and implementation of the environmental and social requirements. The results of this will assessment will be shared with the PCM office as it progresses.

Deadline: this action item is in progress and will be closed within 12 months of the approval of this MAP. This will be revisited at regular intervals throughout the project cycle.