



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 02/10/2020 | Report No: ESRSA00370



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Pakistan	SOUTH ASIA	P170271	
Project Name	Pakistan Goes Global: An Initiative for a Global & Technology-Driven Pakistan		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Macroeconomics, Trade and Investment	Investment Project Financing	2/11/2020	4/2/2020
Borrower(s)	Implementing Agency(ies)		
Islamic Republic of Pakistan	Ministry of Commerce and Textiles		

Proposed Development Objective(s)

To improve the enabling environment for exports and increase firms' export capabilities

Financing (in USD Million)	Amount
Total Project Cost	200.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The Pakistan Goes Global (PGG) project is being prepared with the objective of enhancing the effectiveness of policy reforms in trade and improve firms' export capabilities. The project consists of two inter-related pillars. The first pillar aims at improving the enabling environment for exporting, and includes (i) strengthening key institutions to ensure effective service delivery, and alignment of policies and objectives at the federal level in the overarching areas of trade and competitiveness, and (ii) investing in the export promotion infrastructure. The second pillar aims at supporting firms to upgrade capabilities, to benefit from initiatives undertaken through the first pillar.

The project directly supports the second and fourth Results Areas (RA) of the CPF on "Private Sector Development" and "Service Delivery", and indirectly, the third, on "Inclusion". Specifically, RA 2.1: "Improved Business Environment



for Private Sector”, and 2.4 “Improved Trade Tariff and Ports/Borders Logistics” by making investments conducive to (i) reduce trade and investment costs for firms, and (ii) implement an effective system of support to firms grounded in international good practices. It also contributes to RA 4.4: “Adoption of Performance and Transparency Mechanisms in Selected Institutions” by supporting the implementation of monitoring and evaluation systems for public support interventions to firms. The project and its objective are also aligned with the recommendations of the flagship “Pakistan @100”, which point to the importance of nurturing competition, accessing to markets, and securing higher investments and gaining from them (Reform Focus 4: Trade Openness), as well as with improvement in public sector management (Reform Focus 8: Accountability).

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The bulk of project activities will occur and be managed in Islamabad, but some will be centered in the four provincial capitals.

The Project does not have a physical footprint per se since it is not financing infrastructure or civil works (except for minor refurbishments of offices and display centers), hence there will be no land acquisition. Stakeholder consultations will be undertaken in Islamabad, in provincial capitals and in major export hubs of the country. The Project has moderate labor related impacts stemming from the merger of the Ministry of Commerce (MoC), Ministry of Textiles (MoT), and Ministry of Industry and Production (MoIP); these impacts mainly entail job reassignment and redeployment. Redundancies are not expected given civil service rules which require that civil servants that are rendered surplus be appointed to alternative equivalent posts.

The project will procure 310 IT equipment (as 120 Laptops, 165 Switches, 11 Printers, 10 LED Screens, 4 Servers and 4 ACs, and IT systems will be upgraded in the three organizations i.e. Ministry of Commerce, Small and Medium Enterprise Development Agency (SMEDA), and Trade Development Authority (TDAP). The probability of E-waste generation is proportionately based on the exact numbers of equipment to be disposed off. The environmental risk of E-waste generation associated with the replacement of IT equipment in the three organizations, i.e. MOC, SMEDA and TDAP, is negligible and does not have any adverse impacts at large. Therefore, environmental and social screening will be carried out prior to disposal of e-waste to assess the exact quantity and types of IT equipment, and an E-waste Management Plan will be prepared accordingly.

D. 2. Borrower’s Institutional Capacity

MoC, through the Directorate General of Trade Policy will be the main implementing agency for the project and will liaise and coordinate with three other implementation agencies i.e. TDAP, BOI and SMEDA in implementing the project. MoC, MoT, BoI and TDAP will be responsible for the implementation of component 1 within their respective domains, while SMEDA will be responsible for Component 2.

The implementing agencies do not have experience in assessing or managing environmental or social risks that may result from their interventions, nor do they have experience in implementing donor-financed projects. Given this, the institutional capacity to manage the environmental and social risks is assessed as Low.

The MoC manages its Human Resources function under a Policy and Administration Department headed by an Additional Secretary with a Joint Secretary heading the Human Resources and Administration wing. The capacity of



MoC and other entities that will be merged to handle staff reassignment, following a fair, transparent and participatory process, has been assessed under Labor Management Procedures (LMP) as required under ESS2. A Labor Management Plan will be prepared during Project implementation, once more information is available on the merger and staffing.

The MoC has some prior experience in managing stakeholder consultations with the private sector and development partners. It has previously managed communication campaigns and participates in committees and boards which include the private sector. A Stakeholder Engagement Plan (SEP) has been prepared under ESS10 which identifies all relevant stakeholders for the Project and also the necessary tools and forums needed to ensure their meaningful participation.

With respect to grievance redressal, all ministries have a “Contact Us” section on their websites, where queries and complaints can be lodged with the relevant officials. Similarly, an official helpdesk email is also provided on the Ministry’s website. In addition to the online systems, feedback and grievances can also be sent to the Ministry through official letters addressed to the Secretary, which are then passed on to the relevant quarters. Recently, the Prime Minister’s Secretariat has also introduced a Pakistan Citizen’s Portal, where a complaint regarding a ministry or any government department can be lodged directly with the Prime Minister’s Secretariat. A Performance Delivery Unit (PDU) at the PM Office then asks the relevant ministry to address the complaint within a stipulated period of time. However, there is no information on how well these avenues work, and how promptly they respond to complaints.

In case of grievances of civil servants, complaints can be submitted to the Federal Services Tribunal (FST). FST was constituted under Article 212 of the Constitution of Pakistan, 1973 to adjudicate upon matters relating to the terms and conditions of service for civil servants. The Tribunal is well respected amongst civil servants and has provided relief to applicants and protected their rights .

Project-specific GRMs, for labor employed under the Project and for all other stakeholders, will be established in accordance with ESS2 and ESS10. Details are provided in the Labor Management Procedures and the Stakeholder Engagement Plan.

The E&S Screening Report prepared under ESS1 has identified capacity gaps in the MoC and Government departments relevant to the Project, and has proposed a Training/Capacity Enhancement Plan. Since the MoC and other project entities like Bol and MIP do not have E&S capacity, a consulting firm with E&S capacity will be hired to assist with the implementation of Component 2: Investing in Firms' Capabilities under which technical support in skills development and systems enhancement will be offered to selected SMEs. This firm will also assess the E&S systems and capacity of selected SMEs and will propose industry-specific E&S capacity building measures by developing a Training Manual and will also deliver trainings at regular intervals under the Capacity Enhancement Plan.

Each respective implementation agency will appoint a project director and will hire a procurement specialist and a financial management specialist in charge of the agency’s activities. The project will also establish a Shared Services Unit (SSU). This SSU will be comprised of an Social & Environment Specialist, a Communication Specialist, and an M&E Specialist to ensure safeguards, communication and M&E compliance within the entire project. These positions will be filled within three months of project effectiveness, and may be filled by technical experts hired from the market or by technical staff deputed by the government. A Project Task Force (PTF) led by the Advisor of Commerce, Textiles,



Industries and Production will be formed and officially notified by the government for this project. It will have representation from all the government entities involved in the project to ensure effective and coordinated implementation.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Low

Under Component 1 of institutional strengthening, the project will finance procurement of IT equipment for Government to Business, interactions to reduce the firms' costs of doing business for investors and exporters in MoC. It is estimated that a total of 310 number of IT equipment will be purchased, the majority of which will be installed in the NCC (National Competitiveness Council) Secretariat and in MoC, SMEDA, and TDAP. Most of the old IT equipment will be redeployed within the parent organizations. The chance of electronic waste generation is likely to be negligible. As per the mitigation hierarchy, to reduce and mitigate the risks and impacts of any E-Waste, the MoC will undertake an Environmental & Social Screening and assess potential impacts and mitigation measure to develop the E-waste management plan following the GIIP (Good International Industrial Practices) prior to the project implementation. The project does not involve any civil works nor involves any operations in protected areas and critical habitats.

Under component 3, the project intends to provide advisory and technical support to SME firms on demand basis to conduct a specialized gap analysis (or a needs assessment) to improve their managerial capabilities and commercial strategies, and provide technical advice to compete in international markets. The project will also integrate aspects of environmental and social compliance as per GIIP and international E&S standards into this gap analysis; capacity enhancement measures will be offered under the Project to participating SMEs. The project environmental risk classification is proposed as Low due to the above mentioned risk. The ESCP will outline the environmental impacts management actions with the timeline and allocate amount.

Social Risk Rating

Moderate

The project aims to improve the enabling environment for exports and increasing firm's export capabilities incentivizing their integration into the global marketplace. Project locations are Islamabad and the four provincial capitals; no civil works (except for minor office refurbishment) are planned under the project therefore there will be no land acquisition, nor will it impact indigenous peoples. A "moderate" risk rating for social impacts was assigned following an Environmental and Social Screening undertaken and documented in an E&S Screening Report prepared in accordance with ESS1. This screening confirmed that the project will not undertake any civil works, that it will have no environmental impacts except for e-waste disposal which is low, and it will not impact indigenous people. That said, however, Borrower capacity is limited in terms of managing environmental and social impacts, the proposed merger of three project entities may lead to redeployment of civil servants and though redundancies are not expected, the process will need to be managed carefully through a transparent and predictable process by a Borrower that has no prior experience with donor-financed projects. The Project will abide by national labor laws and regulations in addition to meeting Bank policy requirements. As noted in the LMP, since equivalent occupational health and safety (OHS) legislation does not exist at the federal level and in KP and Balochistan provinces, ESS2's OHS requirements will apply. The ESCP will capture all E&S actions and commitments.

Public Disclosure



A sub-component of Component 1 of the project considers creation of a single Ministry combining Ministry of Commerce and Textiles (MOCT) and Ministry of Industries and Production (MOIP). This activity may lead to redeployment of civil servants, and some jobs may be created (through creation of PGG Board secretariat). Redundancies are not expected but the possibility of any redundancies has been considered in the LMP as required under ESS2. The merger process and staff consolidation and redeployment will need to be managed through a predictable and transparent process. The Project will prepare a plan to manage job reassignment, deployment or redundancies (if any) after merging of ministries. This will be noted in the ESCP.

In the medium to long term the project aims to facilitate an increase in exports, and there will be both positive and negative impacts on labor due to reallocation of production. The change in the incentives associated with the proposed investments under this IPF is aimed at encouraging domestic industry to export, and it is envisaged this will increase economic activity, and consequently employment. It is hoped the operation would indirectly lead to better jobs in the medium to long term due to an increase in economic activity and productivity, and some sectors of the economy will create jobs and others may lose jobs, with an overall increase in job creation at the aggregate level. A Labor Risk Analysis is proposed during Project implementation, after more information is available, to understand how the Government could deal with the short term labor adjustment costs that might derive from reallocation of resources across sectors as a result of the investments that take place under the Project. This will be noted in the ESCP.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

At the appraisal stage the indirect potential environmental risk identified as the E-Waste Management and disposal of IT equipment which will be replaced by new equipment. The general practice of old IT equipment disposal in public sector organizations is reuse within the organizations. But in some cases obsolete IT equipment may need to be disposed off, and in the absence of any E-Waste disposal policies by the Borrower, it is suggested that the MoC undertake an Environmental and Social Screening leading to the development of an indicative EWMP prior to the implementation of project activities. The final and exact number and types of IT equipment and mitigation measures for E-waste management will be determined during the Screening exercise. In addition, an EWMP will follow the Good International Practices (GIIP). The EWMP will be implemented by the MoC through a certified E-Waste disposal contractor. The MoC will undertake an independent third-party assessment of EWMP implementation during the project life.

Under the Component 2, the advisory and technical support provide to SMEs will integrate environment and social considerations, by conducting a Gap Analysis for the particular export sector and proposing capacity building measures which may include regular trainings, which may include E&S trainings also.

An Environmental and Social (E&S) Screening exercise has been done for the Project and an E&S Screening Report has been prepared highlighting the possible impacts, risks, and mitigation measures. The report has project impact and risks for all relevant stakeholders and concluded that since the project will result in small quantity disposal of



electronic equipment, there is a possibility of generation of electronic waste, for which e-waste management plan has been provided which will be prepared prior to e-waste disposal. The project is not financing any civil works therefore there will be no land acquisition, nor will it impact indigenous peoples. There are no significant risks to labor since project activities do not require hazardous work, nor do they pose a risk of use of child, and the possibility of use of forced labor is negligible since most of the project workers will be civil servants or contract staff hired under Government rules which have an age, experience and skill requirement, and employment is voluntary. Migrant and community labor will not be used, and there is no risk of labor influx due to project activities. Occupational health and safety requirements will be overseen through relevant legislation as detailed in the LMP. The Project may have indirect impacts on labor hired by firms that will be affected by its competitiveness strategy, and a Labor Risk Analysis has been proposed during project implementation which will take stock of any such impacts and propose mitigation measures. The proposed E&S Screening includes screening of labor-related impacts.

All mitigation measures and timelines identified in the E&S Screening will be reflected in the ESCP.

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is critical to the Project's success. The ability of Project entities to communicate regularly and effectively with their main stakeholders (ministry employees, private sector firms, chambers of commerce, etc.) will add tremendous value to their ability to reach desired results.

Project implementation agencies are committed to consult with stakeholders prior to undertaking any significant reform effort. A Stakeholder Engagement Plan has been prepared and will be disclosed prior to Project appraisal. The SEP records two consultations held by implementing agencies in November 2019 in Karachi and Sialkot with trade groups and business associations. Notes of these consultations have been shared with participants. Participation of women business owners was low in these consultations and efforts will be made during project implementation to ensure they are adequately consulted.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

A Labor Management Procedures document has been prepared in accordance with ESS2. The project consists mainly of policy implementation. As such there are no risks to labor except for temporary redundancies of non-officer level civil servants who will be absorbed in other government departments, and for whom the SEP proposes robust communications and consultation related actions. The project activities do not require hazardous work, or use of child or migrant labor, and there is no risk of labor influx due to project activities. Occupational health and safety requirements will be overseen through relevant legislation and are explained in the LMP.

The LMP confirms the Project will mostly be staffed by civil servants, whose employment is governed by the Civil Servants Act 1973. ESS2 is not applicable to civil servants with the exception of provisions relating to child and forced labor and occupational health and safety apply to the Project. Recruitment to the civil service is through a voluntary and competitive process, which does not allow for forced labor to exist. As per rules of the Federal Public Services



Commission (FPSC), the government body that oversees recruitment to the civil service, the minimum age for recruitment is 21 years, and as such restrictions on child labor cannot be violated. In the event that primary supply workers are employed under the Project for office refurbishment or e-waste disposal, contracts will include ESS2 requirements with respect to child and forced labor and health and safety standards, and these will be enforced by the PIUs.

In addition to civil servants, the Project will employ an as yet unspecified number of Contract Workers in its PIUs. The exact number of contract workers to be engaged in relation to the Project is presently not known, but has been estimated in the LMP to be approximately in the range of 19 persons. Additional contractual workers may be hired as project implementation proceeds. Contractual workers will be hired using standard government procedures, involving advertisements, tests and interviews supervised by the FPSC. The exact numbers will be known after Approval and will be updated in the LMP accordingly.

The Project will not involve any physical infrastructure or works except for minor refurbishment of existing government offices, but will include the acquisition of IT equipment and possibly software, and also disposal of old IT equipment. However, these acquisitions and disposals are unlikely to occur on an ongoing basis, and as such, the project is unlikely to have a steady stream of primary supply workers.

Moreover, since there are no community infrastructure works in the project, there is no involvement of community labor. Also, no migrant workers will be employed in the project.

The Project may have indirect impacts on labor hired by firms that will be affected by its competitiveness strategy. To advise on these impacts, a labor risk analysis will be prepared during Project implementation to advise the Government.

Given the moderate risk nature of the project, and the adequacy of national law to address the limited labor risks of the project, the LMP does not duplicate national law provisions (as recommended by ESS2 footnote 9).

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant to the Project. In order to promote energy efficiency, procurement of energy efficient equipment such as computer systems with low stand-by power requirements shall be advised which are thus, environmental friendly as well. Negligible amount of E-Waste generation is anticipated due to IT equipment which will be replaced under the Project. However, to apply the mitigation hierarchy to minimize, reduce and mitigate the potential risk associated with the E-Waste, the MoCT, as a precautionary step has undertaken Environmental and Social Screening to assess the extent of the impacts and provide mitigation measures leading to development of an E-Waste Management Plan prior to implementation of activities. The report summarized that the probability of e-waste generation is likely very low, and it is proportionately based on the exact number of equipment to be disposed off. Further, the identified issues of e-waste at institutional level include the unavailability of any guiding legislations, policies and Standard Operating Procedures (SOPs)/guidelines for its management. In addition, the organizations do not have e-waste management plan, storage area or availability of Personal Protective Equipment (PPE) for the concerned personnel handling the ICT waste. The vendors/informal e-waste handlers did not have any PPE or sufficient space available for e-waste recycling. One major issue identified across both levels, is the lack of awareness



pertaining to hazardous waste exposure through occupational risks as well as indirect contact with contaminated soil, dust, air, water, and through food sources, including meat. The capacity building of Government employees involved in electrical and electronic goods handling with training and information about handling e-waste as well as about its safe disposal was suggested. Owing to the gaps in the existing auction policy at institutional level, a revision is also thus, proposed. Finally, the development of guidelines for producers/manufacturers, importers, assemblers and recyclers; and government organizations that are involved in the formulation and enforcement of regulations regarding generation, handling and disposal of e-waste is also advocated. Further, the proposed E-Waste management plan will take into account national laws, regulations and Good International Industrial Practices (GIIP) consistent with the EHSs to dispose and destroy the E-waste from IT equipment replacement. The client will adopt the EWMP at the project implementation stage and throughout the project life cycle. In case of lack of capacity, the project implementation agency can recruit reputable and legitimate licensed contractor(s) in environmentally sound and safe practices as per national and provincial environmental laws and regulations to implement the EWMP.

The project will also provide advisory and technical support to SMEs to improve and enhance their manufacturing and processing to increase competitiveness in the international markets. The inclusion of environmental good practices, including improvement in resource efficiency in energy, water and chemicals etc., will be considered in the technical/advisory recommendations. Similarly, the environmental pollution management from the manufacturing plants and industries will also be the part of improving production and adopt the environmental best practices in the industries sector. The World Bank EHS guidelines will be used during the sector analysis

ESS4 Community Health and Safety

Environmental and Social Screening under ESS1, and ESS3 evaluates and establishes the potential risks and impacts on communities, which may get affected due to implementation of E-waste management plan, and hence proposes mitigation measures relevant to ESS4 and EHSs. Similarly, the EHS will also be proposed in the industry/ sector analysis to be done for SMEs.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The Project will not be financing any civil works. There will be no land acquisition or involuntary resettlement under the project, nor will it lead to restrictions on land use or impacts on livelihoods from such restrictions/acquisition.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This ESS is not relevant since project activities will not involve any direct impacts on biodiversity, habitats and harvesting/production of natural resources. E-Waste Management Plan will include a mechanism to exclude any area within/close to natural habitats from e-waste final disposal.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

The Project will not be affecting Indigenous People given its scope of activities which will not impact the commercial or natural resources of the Kalasha people who are the only IP group in Pakistan recognized by the World Bank.



ESS8 Cultural Heritage

Given the Project scope, it is not expected to have any impacts on tangible or intangible cultural heritage. The E&S Screening exercise will assess the possibility of any intangible and intangible relics or cultural importance.

ESS9 Financial Intermediaries

The Project does not involve any activities with financial intermediaries hence ESS9 is not relevant to this project.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Public Disclosure

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
The Borrower will prepare an E-waste Management Plan during Project implementation with Standard Operating Procedures (SOPs) for the collection, storage, and safe disposal of e-waste generated by the Project during its lifetime, with an expectation that the Borrower and its Vendors/Contractors will continue to follow this Plan after project completion.	09/2020
The Borrower will ensure e-waste related trainings are provided annually to relevant employees and vendors in accordance with the E-waste Management Plan, during the lifetime of the Project.	09/2020
The Borrower will review its General Auction Policy in relation to safe disposal of E-waste disposal.	09/2020
ESS 10 Stakeholder Engagement and Information Disclosure	
Borrower will implement "Table 5.2 Strategy for Stakeholder Engagement" of SEP for continual engagement with stakeholders throughout the project.	12/2020
ESS 2 Labor and Working Conditions	
The Project will prepare a Labor Management Plan, in accordance with ESS2 paragraph 32, during implementation when the Project’s labor requirements are better known to manage labor hiring and deployment.	12/2020



Borrower to operationalize a Grievance Redress Mechanism to process labor related complaints by project workers (non-civil servants), contractual workers, and primary supply workers once project management structures are finalized.	09/2020
A Labor Risk Analysis will be prepared during project implementation to advise on short term labor adjustment costs that might derive from reallocation of resources across sectors as a result of competitiveness policies undertaken by the project.	12/2020
The Borrower will incorporate the requirements of ESS2 (not covered under national law) into contractual agreements with third parties and sub-contractors, together with appropriate non-compliance remedies.	12/2020
ESS 3 Resource Efficiency and Pollution Prevention and Management	
The Borrower will prepare the E-Waste Management plan during implementation as a result of E & S screening results.	09/2020
ESS 4 Community Health and Safety	
The Borrower will develop an E-waste Management Plan which will include Community Health and Safety measures for safe disposal of ICT equipment.	12/2020
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
Borrower will ensure that the E waste Management and disposal activity by the certified contractor should not involve any habitat deterioration during implementation stage to mitigation.	12/2020
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
ESS 8 Cultural Heritage	
Borrower will ensure that the E waste Management and disposal activity by the certified contractor should strictly avoid any physical cultural heritage and sites during implementation stage to mitigation.	12/2020
ESS 9 Financial Intermediaries	

Public Disclosure

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?

No

Areas where “Use of Borrower Framework” is being considered:

The Use of Borrower Framework is not being considered.



IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Islamic Republic of Pakistan

Implementing Agency(ies)

Implementing Agency: Ministry of Commerce and Textiles

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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Practice Manager (ENR/Social) David Seth Warren Cleared on 29-Jan-2020 at 12:38:31 EST