

INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT
INTERNATIONAL DEVELOPMENT ASSOCIATION

THIRD PROGRESS REPORT
ON THE IMPLEMENTATION OF MANAGEMENT'S ACTION PLAN
IN RESPONSE TO
THE INSPECTION PANEL INVESTIGATION REPORT
(REPORT INSP/136219-UG)

ON THE
REPUBLIC OF UGANDA
WATER MANAGEMENT AND DEVELOPMENT PROJECT
(CREDIT NO. 5127-UG)
AND
ENERGY FOR RURAL TRANSFORMATION PHASE III PROJECT
(CREDIT NO. 5653-UG)

July 30, 2022

ACRONYMS AND ABBREVIATIONS

ABIA	Amendment to the Bujagali Indemnity Agreement
BIA	Bujagali Indemnity Agreement
CFR	Central Forest Reserve
EKFS	Extended Kalagala Falls Site
ERT-III	Energy for Rural Transformation III Project
ESIA	Environmental and Social Impact Assessment
ESIA Addendum	Environmental and Social Impact Assessment Addendum for Isimba Hydropower Plant
GoU	Government of Uganda
GWh	Gigawatt hour
HPP	Hydropower plant
IDA	International Development Association
IFC	International Finance Corporation
IPN	Inspection Panel
KFS	Kalagala Falls Site
km	Kilometer
KOA	Kalagala Offset Area (<i>also referred to as Kalagala Falls Site, KFS</i>)
KOSMP	Kalagala Offset Sustainable Management Plan
LRP	Livelihood Restoration Plan
LTCO	Long-Term Conservation Options
MAP	Management Action Plan
MIGA	Multilateral Investment Guarantee Agency
MP	Management Plan (for the EKFS)
MW	Megawatt
NRICA	Nile Riverbank Investors and Conservation Association
RAP	Resettlement Action Plan
SCA	Special Conservation Area
SECP	Stakeholders Engagement and Communication Plan
SRIMF	Social Risk and Impact Management Framework
WMDP	Water Management and Development Project

CONTENTS

ACRONYMS AND ABBREVIATIONS.....	ii
I. BACKGROUND.....	1
II. IMPLEMENTATION OF THE MANAGEMENT ACTION PLAN.....	4
III. CONSULTATIONS WITH REQUESTERS ON MAP IMPLEMENTATION PROGRESS.....	7
IV. NEXT STEPS.....	9

Third Progress Report
on the Implementation of the Management Action Plan in Response to the
Inspection Panel Investigation Report on the Uganda Water Management and Development
Project (CREDIT NO. 5127-UG) and Uganda Energy for Rural Transformation Phase III
Project (CREDIT NO. 5653-UG)

1. This is the third Progress Report to the Board of Executive Directors (the Board) on the implementation of the Management Action Plan (MAP) in response to the Inspection Panel Investigation Report No. INSP/136219-UG on the Uganda Water Management and Development Project (WMDP) and Uganda Energy for Rural Transformation Phase III (ERT-III) Project, covering the period August 1, 2021 – July 31, 2022.

2. There has been good progress with regard to the development of the Stakeholders Engagement and Communication Plan (SECP) and the EKFS Management Plan. Draft documents for both have been reviewed by the Bank and found acceptable. Finalization of the the EKFS Management Plan requires travel and face-to-face meetings and hence has been delayed due to COVID-related restrictions. With the lifting of these meeting and travel restrictions, the Government of Uganda (GoU) has informed the Bank that it will resume the consultation process for the outstanding MAP actions during the second half of 2022.

I. BACKGROUND

3. *The Bujagali Project.* In 2007, the Board approved the Uganda Private Power Generation (Bujagali) Project (Bujagali Project), which involved construction of the 250-MW Bujagali Hydropower Plant (HPP) on the Victoria Nile, some eight kilometers north (downstream) of the town of Jinja. The project was supported by loans from the International Finance Corporation (IFC), and Guarantees from the International Development Association (IDA) and the Multilateral Investment Guarantee Agency (MIGA). The Bujagali HPP was commissioned in August 2012. In 2020, the plant delivered 1,385 GWh, or 31.3 percent of the total energy generated in the country that year. Following project closure, as per policy, the Bank continues to monitor the financial risks covered by the IDA guarantee, which will expire in November 2023.

4. *Kalagala Falls offset.* To alleviate the adverse environmental and social impacts of the Bujagali Project, the GoU provided contractual undertakings to IDA to establish an offset in the area of Kalagala Falls, located about 15 km downstream of Bujagali HPP, which included a 10.2 km stretch of the river, as well as the Central Forest Reserves (CFR) of the Kalagala Falls and the Nile Bank. This offset, referred to as the Kalagala Falls Site (KFS) and also as the Kalagala Offset Area (KOA), was "... exclusively to protect its natural habitat and environmental and spiritual values..."¹ To manage the offset, the GoU approved a Kalagala Offset Sustainable Management Plan (2010-2019) (KOSMP), which was launched in May 2011.² The WMDP supported, under one of its components, priority investments related to the implementation of a part of the KOSMP. The WMDP closed on December

¹ Section 3.06 of the Bujagali Indemnity Agreement dated July 18, 2007 (the "BIA") between International Development Association and Republic of Uganda (Number B-0130-UG).

² Maintaining a sustainable management program for KFS and Mabira CFR is an obligation under the Indemnity Agreement.

31, 2018; as per its Implementation Completion Report (ICR), the activities in support of the KOSMP were completed satisfactorily and the GoU is committed to protection of the affected areas.³

5. *Isimba HPP.* As part of its plan to expand electricity access and provide adequate power supply, the GoU began construction of the Isimba HPP in 2015. The project, a 183-MW facility located about 36 km downstream of the Bujagali dam, was prepared and implemented by the GoU, using its own funds and financing from China Eximbank. The World Bank Group was not involved in preparation, financing, or construction of the Isimba project, nor was the Bank consulted by the GoU on the construction of the Isimba HPP. The Isimba HPP was commissioned in March 2019.

6. *ESIA Addendum.* When the Bank became aware in 2012 of the planning for the Isimba project and its proximity to the KFS, the Bank engaged with the GoU to determine the extent to which the Isimba HPP would affect the KFS. Since the Environmental and Social Impact Assessment (ESIA) for the Isimba HPP did not adequately address the potential impacts of the project on the KFS, the Bank requested a further assessment to specifically examine these potential impacts. In response, the GoU, using IDA funds from the ERT III project, prepared: (a) an Addendum to the ESIA of the Isimba HPP (ESIA Addendum), which focused on assessing environmental and social impacts of the Isimba HPP on the KFS and identifying mitigation measures; and (b) a Long-Term Conservation Option Report (LTCO Report), which examined options for protecting the KFS using the laws and regulations of the Republic of Uganda. The LTCO Report was completed in July 2017 and the ESIA Addendum in November 2017. With the completion of these two studies in 2017, the ERT-III is no longer financing any activities related to the “Extended KFS” (EKFS).

7. *Requests for Inspection.* On September 22, 2016, the Inspection Panel (IPN or the Panel) [registered two Requests for Inspection](#), IPN Requests RQ 16/05 and RQ 16/08 (hereafter referred to as “the Requests”), of three IDA-financed projects that were in various ways related to the KFS: the Bujagali Project, and the WMDP and ERT-III Projects, as described above. Management provided its [Response](#) to the Requests on October 27, 2016. On December 16, 2016, the IPN submitted to the Board its Recommendation, recommending deferral of its decision regarding investigation pending completion of Isimba HPP ESIA Addendum, preparation of which was in progress at the time. On April 4, 2017, the Board (a) found that the Bujagali Project was not eligible for investigation as the project closed in 2012; and (b) accepted the deferral of the IPN’s recommendation to investigate, for the remaining two projects, the WMDP and ERT-III.

8. *Panel Investigation.* On February 4, 2018, Management provided an [Update on Management Actions](#) to the Panel and the Board with information on the actions taken during the deferral period and the completion of the ESIA Addendum for the Isimba HPP in late 2017. The Panel subsequently sent its [Second Report and Recommendation](#) to the Board on May 3, 2018, recommending an investigation of the WMDP and ERT-III. The investigation, authorized by the Board on September 19, 2018, was completed on May 2, 2019, when the IPN issued the [Investigation Report](#) (Report No. 136219-UG). On June 28, 2019, Management provided its [Report and Recommendation](#) to the [Board, which considered it](#) on December 3, 2019, and approved the Management Action Plan.

9. *Amended Indemnity Agreement.* Following the completion of the ESIA Addendum and LTCO Report in 2017, the Bank and the GoU entered into an amendment to the Bujagali Indemnity

³ Republic of Uganda: Water Management and Development Project – Implementation Completion and Result Report (IDA-51270), World Bank, February 12, 2020.

Agreement (BIA)⁴ to reflect the findings and recommendations of these reports. The amended BIA (ABIA), signed on January 24, 2018, modified the boundaries of the KFS by excluding the portion of the river flooded by the Isimba HPP reservoir, and extending the KFS further upstream toward the Bujagali dam, creating the EKFS.

10. *Extended Kalagala Falls Site.* The EKFS⁵ encompasses “the stretch of Nile River approximately 15 kilometers long that begins upstream at 2.5 kilometers below the Bujagali dam wall and ends downstream at the tail end of the Isimba Dam reservoir (Maximum Pool Level of 1,055 meters above sea level), thereby including (A) the entire Nile River aquatic area within these limits; (B) all river islands within these limits; (C) all land within 100 meters of both the left and right river banks from the annual maximum high-water line;⁶ and (D) the entire area of the Namavundu, Kalagala Falls and Nile Bank Central Forest Reserves except any portions inundated by the reservoir of the Isimba Dam.”

11. *Obligations of the GoU.* The ABIA addresses weaknesses identified in the management and protection of the original KFS by including specific GoU obligations to assure effective establishment and maintenance of the EKFS in ways that also appropriately address potential social impacts. The relevant GoU obligations and actions include: (a) to adopt, by December 31, 2019, and thereafter maintain, a mechanism that ensures legally-binding and long-term conservation, protection and management of the EKFS; and (b) to prepare and adopt, by December 31, 2019, a *Management Plan (MP, or EKFS MP)* for the EKFS, including measures to address potential social risks.⁷ These obligations are further elaborated in a *Supplemental Letter*⁸ dated January 24, 2018 between IDA and the Republic of Uganda which – *inter alia* – stipulates that if the MP requires the imposition of new or enhanced restrictions on access to natural resources, it will specify measures that would be taken to provide appropriate time-bound compensation to people using natural resources and whose livelihoods could be adversely affected by the EKFS-related management activities, prior to the effectiveness of such MP, and based on eligibility criteria mutually agreed by the GoU and IDA.

12. The ABIA preserves the objectives of the protection and commits the Republic of Uganda to establishing long-term protection of the EKFS under the Ugandan legislation. The Supplemental Letter further clarifies the elements that the legal mechanism and the MP are required to include, such as measures to protect the livelihoods of people adversely impacted by any new/enhanced restrictions under the EKFS MP. Overall, the EKFS represents a significant net gain in the areas to be protected compared to the original boundaries of the KFS.

⁴ Available here: <http://documents.worldbank.org/curated/en/520961519228498878/Official-Documents-Amendment-to-the-Indemnity-Agreement-for-B0130-UG>

⁵ The name “Extended Kalagala Fall Site” (EKFS) is used informally to refer to the Kalagala Falls Site as defined by the January 24, 2018, amendment to the BIA. The ABIA continues to use the term “Kalagala Falls Site” to refer to this area. In some documents of the Republic of Uganda, the area is referred to as “Kalagala and Itanda Falls Special Conservation Area.”

⁶ The 100-meter limit was selected to coincide with the existing “river bank” protection zone established under the National Environment (Wetlands, River Banks and Lake Shores Management) Regulations, 2000, in order to avoid any incremental impact of establishing the EKFS on people’s livelihoods.

⁷ The original November 30, 2018 deadline for these two obligations was extended to December 31, 2019 by an amendment to the BIA dated November 30, 2018, available here: <http://documents.worldbank.org/curated/en/394221544801526377/Official-Documents-Third-Amendment-to-Indemnity-Agreement-B-0130-UG>

⁸ Available here: <http://documents.worldbank.org/curated/en/480341518474391782/Official-Documents-Supplemental-Letter-Ref-Section-3-06-a-of-Amended-Indemnity-Agreement-for-B0130-UG>

II. IMPLEMENTATION OF THE MANAGEMENT ACTION PLAN

MAP implementation progress

13. Table 1 summarizes the status of actions taken under the MAP as of June 30, 2022.

Table 1: Status of MAP Implementation

Action	Status (as of June 30, 2022)
<ul style="list-style-type: none"> • The GoU to prepare a public consultation and communication plan for the Livelihood Restoration Plan (LRP) and EKFS MP, in coordination with local community-based organizations. • The Bank will review and advise through knowledge and good practice sharing. <p><i>Timeline: by November 30, 2019</i></p>	<p><i>Partially completed</i></p> <ul style="list-style-type: none"> • Ongoing. The GoU prepared a Stakeholders Engagement and Communication Plan (SECP) in November 2019. The Bank reviewed the SECP and provided comments and suggested improvements in early December 2019. The GoU strengthened engagement with stakeholders, including meetings in early 2020 with the Nile Riverbank Investors and Conservation Association (NRICA), an association representing a large number of stakeholders in the EKFS (such as tourism operators, real estate developers, business owners, landowners, and individuals with land interests in the EKFS). The onset of the COVID-19 pandemic in March 2020 and the ensuing prohibition of meetings and public gatherings disrupted the consultation process. However, the GoU has communicated to the Bank its intention to resume consultations shortly now that pandemic restrictions have been lifted. • Completed. The GoU technical team provided an updated draft SECP on June 22, 2021, which the Bank reviewed and cleared in February 2022. On June 30, 2022, the Bank communicated the acceptance of the draft SECP for public disclosure of and consultation on the EKFS MP. The Bank will participate in the consultations as an observer and continue to provide advice and good practice lessons on stakeholder consultations.
<p>The GoU to declare EKFS a Special Conservation Area under the National Environment Act. The Bank will review the draft Statutory Order for consistency with the 2018 BIA.</p> <p><i>Timeline: by December 31, 2019</i></p>	<p>Completed. The GoU declared EKFS as a Special Conservation Area under the National Environment Act through a Statutory Instrument, which was gazetted on December 27, 2019.</p> <p>The Bank reviewed the Statutory Instrument for consistency with the 2018 BIA and was satisfied.</p>
<ul style="list-style-type: none"> • The GoU to prepare and adopt the EKFS Management Plan. 	<ul style="list-style-type: none"> • Ongoing. The GoU has developed a draft EKFS MP, which outlines the conservation objectives of the EKFS and the activities proposed by the GoU to be restricted or prohibited within the offset area; it also broadly outlines management arrangements (including interagency coordination arrangements) for the operation of the offset. In addition, the EKFS MP outlines an ongoing role for the community in the operation of the offset, the

Action	Status (as of June 30, 2022)
<ul style="list-style-type: none"> The Bank will review and clear the plan and monitor the implementation for consistency with the 2018 BIA and relevant Bank Policy. <p><i>Timeline: preparation and adoption by December 31, 2019; implementation throughout the duration of the IDA Partial Risk Guarantee (November 2023)</i></p>	<p>precise nature of which remains to be finalized through a process of consultation and feedback from the local community and interest groups (such as tourism operators and NRICA). The GoU has committed to completing the consultations and providing the finalized version of the EKFS MP as soon as possible.⁹</p> <ul style="list-style-type: none"> Ongoing. Following several drafts and deliberations between the GoU and the Bank, the Bank returned the draft EKFS MP in February 2022 to the GoU with minor comments to be addressed. The GoU provided to the Bank the final consultation draft of the EKFS MP in April 2022. The Bank communicated acceptance of that draft as a basis for further community consultations on June 30, 2022 and will review for clearance the finalized version of the EKFS MP once available.
<ul style="list-style-type: none"> The GoU to prepare and adopt a LRP (including, if applicable, a Resettlement Action Plan - RAP) for the EKFS. 	<ul style="list-style-type: none"> Ongoing. As noted in the last progress report, preparation of an LRP and any RAP which may be required was put on hold until finalization of the MP. This is appropriate because while some restrictions imposed by the GoU under the EKFS MP may lead to limitations on access to economic assets or resources, resulting in the need for plans and resources to mitigate the impacts of such restrictions on the local community, the precise impacts are not known at present and are likely to evolve over the life of the EKFS. <p>In addition, preparing the MP before the LRP and RAP allows the GoU to focus first on minimizing the impacts and restrictions related to establishing the offset, consistent with the conservation objectives of the EKFS, before focusing on managing those remaining impacts.</p> <p>The EKFS MP enshrines key principles for managing the social impacts of establishing and operating the offset. These will continue to apply even after expiration of the ABIA and the Bank’s supervision obligation. These principles are contained in a Social Risk and Impact Management Framework (SRIMF) annexed to the MP. The SRIMF clarifies the social risk management principles (including resettlement principles), organizational arrangements, and design criteria to be applied to activities under the EKFS MP, as well as the establishment of the offset itself.</p> <p>The SRIMF will guide the preparation of plans to ensure that the impacts of the EKFS are adequately understood by the local community, and that any impacts resulting from the EKFS-related activities or restrictions are assessed and mitigated appropriately.</p>

⁹ The draft SMP has been disclosed on July 19, 2022, on Ministry's Website (<https://energyandminerals.go.ug/>)

Action	Status (as of June 30, 2022)
<ul style="list-style-type: none"> • The Bank will review and clear the plans and monitor implementation for consistency with the 2018 BIA and Operational Policy (OP) 4.12. <p><i>Timeline: preparation and adoption of the LRP (and RAP, if applicable) prior to impacts, as defined by the EKFS MP.</i></p>	<p>Once details about the EKSF activities have been agreed between the GoU and stakeholders through a process of community engagement, the SRIMF will be applied to develop specific plans as needed and as proportionate to potential risks and impacts of the activity. Proposed activities that will cause physical and/or economic displacement will not commence until such specific plans have been finalized and implemented as required.</p> <p>The SRIMF seeks to ensure that any possible adverse impacts to people’s livelihoods are minimized and addressed through appropriate mitigation measures. For example, the SRIMF minimizes displacement impacts by:</p> <ul style="list-style-type: none"> • Avoiding displacement of people as much as possible. • In the event that displacement or restrictions on land use are inevitable, having a well-designed compensation, livelihood restoration and/or relocation process in place; • Compensating for lost income and livelihoods in a timely manner; and ensuring resettlement assistance addresses the true impact on affected people to restore their livelihoods. <ul style="list-style-type: none"> • Ongoing. The Bank will review for clearance the finalized version of the plans, once available.

14. The actions reported in the table are discussed in more detail below.

15. *Stakeholder consultations and communication.* The GoU held a number of consultative meetings throughout preparation of the ESIA Addendum (2016-2017), preparation of the Statutory Instrument to declare the EKFS as a SCA (2018-2019), and preparation of the EKFS MP (2019-2020). The consultations were carried out by teams from the Ministry of Energy and Mineral Development, Ministry of Water and Environment, National Forestry Authority, and National Environment Management Authority. The mobilization of stakeholders for the consultations was carried out by local level leaders and local government institutions.

16. During finalization of the Statutory Instrument, in November 2019 the GoU also drafted the SECP that is to accompany preparation and implementation of the EKFS MP. The Bank team provided comments and suggested improvements to the plan. The GoU technical team provided an updated SECP on June 22, 2021, which the Bank reviewed and cleared in February 2022 as part of the EKFS MP package. On June 30, 2022, the Bank communicated the acceptance of the draft SECP for public disclosure and validation of the EKFS MP. The Bank will participate in the consultation exercise as an observer and continue to provide advice and good practice lessons on stakeholder consultations.

17. *Legal protection of the EKFS.* The adoption of the Statutory Instrument in December 2019, approved by Parliament, was a significant milestone and a sign of the commitment of the Republic of Uganda to ensuring long-term, sustained protection of the offset under Ugandan legislation and, therefore, beyond the expiration of the Indemnity Agreement scheduled for November 2023.

18. *EKFS MP.* The GoU has prepared a draft of the EKFS MP, which the Bank has deemed acceptable for disclosure and community consultations. Since some restrictions imposed by the MP may lead to limitations on access to economic assets and resources for the local community, the EKFS MP includes a process of consultations and community engagement which will both determine the form of ongoing community engagement in the management and operation of the offset and confirm the exact nature of the restrictions imposed by the EKFS MP. Consequently, the EKFS MP cannot be considered final until this consultative process is complete, and the plan is updated to include the final arrangements agreed with the community. This process is expected to take several months. The GoU has committed to completing these consultations and MP finalization as soon as possible.

19. *LRP and RAP for the EKFS.* As noted in the last progress report, preparation of an LRP and any RAP which may be required was put on hold until the EKFS MP is finalized. While some restrictions imposed by the EKFS MP may lead to limitations on access to economic assets and resources, resulting in the need for plans and resources to mitigate the impact on the local community, the precise impacts are not yet known and are likely to evolve over the life of the EKFS. As such, delaying the development of LRPs and RAPs will allow the GoU to minimize the impacts of establishing the offset by limiting displacement and restrictions to clearly identified activities under the EKFS MP necessary to achieve the conservation objectives of the EKFS.

20. As the EKFS will outlive the ABIA and hence the Bank's supervision obligations, the EKFS MP has enshrined key principles for managing the social impacts of establishing and operating the offset in the SRIMF. The SRIMF clarifies the social risk management principles (including resettlement principles), organizational arrangements, and design criteria to be applied to activities under the EKFS MP, as well as the establishment of the offset itself.

III. CONSULTATIONS WITH REQUESTERS ON MAP IMPLEMENTATION PROGRESS

21. *Consultations.* Consultations on MAP implementation progress with Requesters and affected community members were held on July 19, 2022, through a hybrid meeting that included a physical meeting held in Jinja City with some Bank staff present, and virtual participation by other Bank staff.

22. The Requesters were invited to the consultation meetings through a formal letter dated July 5, 2022, that was distributed via email. Follow up telephone calls were made to confirm receipt of the invitation.

23. A total of 42 community members and stakeholders participated. There was no limit on the number of participants. During the consultations, the status of progress in implementing the MAP actions was presented. Then meeting participants were invited to provide feedback or ask questions. The opportunity to participate was open to every participant without limitation as to time or number of questions. The consultation meeting did not include representatives from the GoU or the implementing agency.

24. The participants were informed that translation would be available between English and local languages (Lusoga and Luganda) where required. Discussions were conducted in English and local languages with translations from Bank staff to provide clarifications as needed.

25. ***Feedback from the consultations:***

- Consultation participants welcomed the fact that the EKFS MP provides a framework that accommodates the varying interests of the stakeholders in the EKFS, that is, the interests of those who wish to stay (conservationists) and those who wish to leave (with compensation for various reasons as their activities or preferences may not align with the requirements of the gazetted area).
- Participants expressed their frustration regarding the slow pace to arrive at a resolution on the adoption of the EKFS MP. For those who wish to leave, the frustration was largely to the delay in obtaining compensation, even after the GoU undertook the assessment. Those who wish to stay and continue operating their businesses within the framework of the EKFS MP need clarity on guidelines to obtain permits, secure land rights and continue their business operations within the EKFS. The Bank team agreed to relay these concerns to the GoU and to continue to follow up on implementation of the EKFS MP.
- Participants also expressed concern that environmental degradation of the EKFS continues to occur, undermining the objectives of the established special conservation area. Participants shared observations of continued illegal forest clearing and cultivation on the riverbanks, leading to landslides in the embankment areas. Other activities contributing to degradation include farming, tree cutting, sand mining and pollution from upstream of the EKFS.
- Participants requested improved communication and a more proactive approach from the GoU regarding the permitted activities in the EKFS. They requested timely responses to their communications and requests for appointments/meetings. They also criticized the lack of a specific Grievance Redress Mechanism (GRM) for the EKFS.
- Participants had misconceptions on the role of the World Bank and GoU agencies in the implementation of the EKFS MP. The Bank team clarified that implementation of the EKFS MP is the responsibility of GoU and the World Bank's role is limited to monitoring its implementation.
- Participants requested that the demarcation of boundaries of the EKFS be clarified before implementation of the EKFS MP. In addition, the consultations/outreach on the adopted EKFS MP need to be extensive to ensure that all stakeholders (including women and children) are considered. The Bank team confirmed that, in accordance with Bank policy, the Bank requires the GoU to undertake robust consultations/outreach with stakeholders on the EKFS MP; the team also confirmed that the Bank will play a monitoring role in these consultations.
- Some participants were under a mistaken impression that the Bank was directly involved in the construction of the Isimba Dam and complained about the pace of the related compensation and resettlement process. The Bank team clarified that Isimba is not financed by the Bank.

IV. NEXT STEPS

26. This progress report will be provided to the Requesters, and publicly disclosed on the Bank's website.
27. *Next progress report.* The next progress report will be provided to the Board in 12 months' time, or upon completion of the MAP, whichever occurs first.