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EXECUTIVE COMMITTEE OF THE MULTILATERAL FUND FOR THE IMPLEMENTATION OF THE MONTREAL PROTOCOL Eightieth Meeting Montreal, 13-17 November 2017

#### THE WORLD BANK BUSINESS PLAN FOR 2018-2020

1. This document presents the World Bank business plan for 2018-2020¹ and includes: the planned activities for the phase-out of ozone-depleting substances (ODS) during the 2018-2020 period; the business plan performance indicators; and recommendations for consideration by the Executive Committee. The narrative of the World Bank's business plan for 2018-2020 is attached to the present document.

### Planned activities during 2018-2020

2. Table 1 sets out, by year, the value of activities included in the World Bank's business plan.

Table 1: Resource allocation in the World Bank business plan for 2018-2020 as submitted (US \$000s)\*

Table 1: Resource anocation in the world bank business plan for 2018-2020 as submitted (US \$0008).						
	2018	2019	2020	Total	<b>Total after</b>	
				(2018-2020)	2020	
Required for compliance						
Approved HCFC phase-out	29,572	24,662	16,659	70,894	88,948	
management plans (HPMPs)						
HCFC production - stage II	54,346	54,346	24,046	132,738	96,184	
HPMP stage II	5,226	7,078	5,596	17,900	1,742	
Required for compliance subtotal	89,144	86,086	46,302	221,532	186,874	
HFC activities						
HFC - demonstration	5,885	0	0	5,885	0	
HFC - enabling activities	250	0	0	250	0	
HFC - investment	856	0	0	856	0	
HFC activities subtotal	6,991	0	0	6,991	0	
Standard activities						
Core unit	1,735	1,735	1,735	5,205	0	

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<sup>&</sup>lt;sup>1</sup> A draft business plan for 2018-2020 of the World Bank was discussed at the Inter-agency coordination meeting (IACM) held in Montreal from 5 to 7 September 2017. The business plan contained in this document has addressed the issues raised at the meeting.

Pre-session documents of the Executive Committee of the Multilateral Fund for the Implementation of the Montreal Protocol are without prejudice to any decision that the Executive Committee might take following issuance of the document.

	2018	2019	2020	Total (2018-2020)	Total after 2020
Institutional strengthening (IS)	677		677	1,353	0
Standard activities subtotal	2,412	1,735	2,412	6,558	0
Grand total	98,547	87,821	48,714	235,081	186,874

<sup>\*</sup> Including agency support cost where applicable.

3. Additional information on some of the proposed activities is provided below.

### HCFC production - stage II

- 4. A total of US \$228.9 million is included for the HCFC production phase-out management plan (HPPMP) for China, i.e., US \$132.7 million for the period 2018-2020 and US \$96.2 million for after 2020.
- 5. However, the average annual level of funding after stage I of the HPPMP starting in 2017 should be US \$21.87 million (or US \$65.62 million for the period 2018-2020) assuming the maximum amount of funding (US \$406.56 million)<sup>2</sup> including agency support costs per decision 69/28(e). Therefore, the proposed level of funding for the period 2018 to 2020 would exceed the average annual amount by approximately 100 per cent.
- 6. The request for funding for stage II of the HPPMP for China has been resubmitted to the 80<sup>th</sup> meeting in accordance with decision 79/48.

### **HPMP** stage II

7. The funding distribution of stage II of HPMPs by sector is provided in Table 2.

Table 2: Funding distribution of stage II of HPMPs by sector (US \$000)

Sector	2018-2020	After 2020	Total	Per cent of total (%)
Rigid foam	2,353	261	2,615	13.3
Refrigeration air-conditioning	2,222		2,222	11.3
Refrigeration commercial	2,427	270	2,696	13.7
Refrigeration servicing	9,480	1,053	10,533	53.6
Solvent	1,418	158	1,576	8.0
Total	17,900	1,742	19,642	100.0

### HFC-related activities

- 8. HFC activities include enabling activities (US \$250,000 in 2018 for Indonesia); technology demonstration of HFC-23 by-product conversion (US \$5.9 million in 2018 for China); and HFC investment activities (US \$856,000 in 2018 for Thailand).
- 9. One of the pre-requisites for including an HFC activity in a business plan is a letter of intention/endorsement from the government concerned. The World Bank has submitted all the required letters for these activities.

<sup>&</sup>lt;sup>2</sup> US \$385 million plus agency support costs of US \$21.56 million (calculated at 5.6 per cent of the project cost).

### Core unit costs

10. The World Bank has increased the core unit budget for 2018<sup>3</sup> to US \$1.735 million from US \$1.725 million, at a lower rate than the annual rate of 0.7 per cent that has been agreed to-date.

### Proposed adjustments by the Secretariat

11. During the IACM, adjustments to the business plans of bilateral and implementing agencies were agreed based on relevant decisions of the Executive Committee. In reviewing the revised World Bank business plan for 2018-2020, the Secretariat noted that the following adjustments were not included:

Table 3: Adjustments to the World Bank business plan for 2018-2020 (US \$000)

Adjustment	2018-2020	After 2020
HPMP values to reflect the actual amounts approved under the agreements	1,070	11,289
Stage II of HPPMP starting in 2017 as per decision 71/23(c)	-67,115	122,559
New HPMP activities (stage II) with submissions to the 80 <sup>th</sup> meeting to	-655	314
match the proposed funding level as originally submitted		
HFC enabling activities as per decision 79/46(c)	-114	0

12. Table 4 presents the results of the Secretariat's proposed adjustments to the World Bank business plan for 2018-2020, which are also addressed in the context of the Consolidated business plan of the Multilateral Fund for 2018-2020<sup>4</sup>.

Table 4: Resource allocation in the World Bank's adjusted business plan for 2018-2020 (US \$000s)\*

	2018	2019	2020	Total (2018-2020)	Total after 2020
Required for compliance					
Approved HPMPs	27,259	28,046	16,659	71,964	100,237
HCFC production - stage II	21,874	21,874	21,874	65,623	218,743
HPMP stage II	5,226	6,794	5,226	17,246	2,055
Required for compliance subtotal	54,359	56,714	43,760	154,833	321,035
HFC activities					
HFC - demonstration	5,885	0	0	5,885	0
HFC - enabling activities	136	0	0	136	0
HFC - investment	856	0	0	856	0
HFC activities subtotal	6,877	0	0	6,877	0
Standard activities					
Core unit	1,735	1,735	1,735	5,205	0
IS	677		677	1,353	0
Standard activities subtotal	2,412	1,735	2,412	6,558	0
Grand total	63,648	58,449	46,171	168,268	321,035

 $<sup>\</sup>ensuremath{^{*}}$  Including agency support cost where applicable.

### **Performance indicators**

13. The World Bank submitted performance indicators pursuant to decision 71/28 in its business plan narrative. After several discussions, the World Bank and the Secretariat agreed on the targets as shown in Table 5.

 $<sup>^3</sup>$  The World Bank's 2018 core unit cost request has been submitted to the  $80^{\rm th}$  meeting (UNEP/OzL.Pro/ExCom/80/29).

<sup>&</sup>lt;sup>4</sup> UNEP/OzL.Pro/ExCom/80/16.

**Table 5: Performance indicators for the World Bank** 

Type of indicator	Short title	Calculation	2018 target
Planning— Approval	Tranches approved	Number of tranches approved vs. those planned*	8
Planning— Approval	Projects/activities approved	Number of projects/activities approved vs. those planned (including project preparation activities)**	6
Implementation	Funds disbursed	Based on estimated disbursement in progress report	US \$30,966,115
Implementation	ODS phase-out	ODS phase-out for the tranche when the next tranche is approved vs. those planned per business plans	1,657.2 ODP tonnes
Implementation	Project completion for activities	Project completion vs. planned in progress reports for all activities (excluding project preparation)	17
Administrative	Speed of financial completion	The extent to which projects are financially completed 12 months after project completion	90%
Administrative	Timely submission of project completion reports	Timely submission of project completion reports vs. those agreed	On time
Administrative	Timely submission of progress reports	Timely submission of progress reports and business plans and responses unless otherwise agreed	On time

<sup>\*</sup> The target of an agency would be reduced if it could not submit a tranche owing to another cooperating or lead agency, if agreed by that agency.

### RECOMMENDATIONS

- 14. The Executive Committee may wish:
  - (a) To note the World Bank business plan for 2018-2020 contained in document UNEP/OzL.Pro/ExCom/80/21; and
  - (b) To approve the performance indicators for the World Bank as set out in Table 5 in document UNEP/OzL.Pro/ExCom/80/21.

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<sup>\*\*</sup> Project preparation should not be assessed if the Executive Committee has not taken a decision on its funding.

### 2018-2020 BUSINESS PLAN



## INVESTMENT AND NON-INVESTMENT OPERATIONS FUNDED BY THE MULTILATERAL FUND OF THE MONTREAL PROTOCOL

Presented to the 80<sup>th</sup> Meeting of the Executive Committee of the Multilateral Fund

18 September 2017

### I. MULTILATERAL FUND TARGETS

### A. Meeting the Objectives of the Multilateral Fund

- 1. The three-year rolling Business Plan for the World Bank has been prepared on the basis of approved and projected funding needs of client countries covering the years 2018-2020.
- 2. The objectives of the proposed 2018-2020 Business Plan for the World Bank are to:
  - a) Assist Article 5 countries in sustaining and meeting the obligation pertaining to HCFC consumption and production phase-out the 35% reduction in 2020 and also to meet the extended HCFC phase-out commitment under each country's Agreement with the Executive Committee.
  - b) Assist Article 5 countries in implementing activities for HFC-related projects in response to decisions undertaken at the 79th Meeting of the Executive Committee.
  - c) Ensure Article 5 partner countries' implementation of institutional strengthening (IS) activities.
- 3. The proposed 2018-2020 Business Plan of the World Bank includes annual work programs of sector plans and national plans, previously approved, to phase out HCFCs, a Stage II gradual production phase-out plan, subject to consideration by the 80<sup>th</sup> ExCom, as well as the renewal of the institutional strengthening activities. The Bank's Business Plan also includes additional stage II HCFC phase-out sector plans for Thailand, and in light of the decisions 79/45, 79/46, and 79/47, the Bank's Business Plan also includes a number of HFC investment projects, HFC-enabling activities, and HFC-23 demonstration project.
- 4. The expected impact of proposed new investment activities for the 2018-2020 period are summarized in Table I-1, below. It should be noted that activities planned for these years are included on an indicative basis, and that they may later be revised as part of individual project submissions or future year World Bank business plan submissions.

Table I-1: Expected impact of new investment activities anticipated to be requested by the World Bank for the years 2018-2020 (ODP tonnes)

	2018	2019	2020	Total
HCFC Sector Plans Stage II (Philippines and Thailand)	61.90	61.90	102.71	226.51
HCFC Production Phase-out Plan Stage II (China)	1,188.00	0.00	5,076.00	6,264.00
Total (ODP tons)	1,249.90	61.90	5,178.71.60	6,490.51
HFC-23 demonstration project (MT)			500.00	500.00
HFC Investment Projects (MT)		40.00		
Total (MT)		40.00	500.00	540.00

5. Other than the ODP to be phased out from new investment activities proposed for the 2018-2020 period, additional phase-out of 1,588.25 ODP tons will be achieved by 2020 through the ongoing implementation of previously approved multi-year projects. This additional phase-out is summarized in Table I-2.

Table I-2: Expected impact of approved investment activities anticipated to be requested by the World Bank for the years 2018-2020 (ODP tonnes)

	2018	2019	2020	Total
HCFC Sector Plans Stage I	30.51	0.00	0.00	30.51
HCFC Sector Plans Stage II	696.34	0.00	861.40	1,557.74
Total	726.85	0.00	861.40	1,588.25

## Strategic approach to HCFC phase-out and HFC-related activities in the proposed 2018-2020 Business Plan

- 6. <u>Balancing supply and demand of HCFC Production and Consumption:</u> China is the world's largest producer, consumer of HCFCs for ODS use. Based on 2016 information, China consumed 62% of its production for ODS use and export the rest. The closure of 5 HCFC producers at the beginning of 2015 have tightened the supply of HCFCs to both the domestic and export markets. Additional reduction in HCFC production capacity required by China to meet the compliance target in 2020 will further complicate the supply and demand balance.
- 7. To assist China in meeting the production compliance targets in 2020, the World Bank had already submitted stage II of the HCFC production phase-out plan for the ExCom's consideration in 2017 In preparing these plans, close consultations with other implementing agencies and with other Article 5 countries with high HCFC consumption had been carried out. It is critical that the production of HCFCs are reduced in order to synchronize with the expected demand in China and its exports market to avoid flooding the market with cheap HCFCs that could undermine the efforts to reduce consumptions of all Article 5 countries.
- 8. Support for the HFC activities related to the Kigali Amendment: The adoption of the Kigali Amendment to phase-down HFCs presents a number of issues for countries to consider before ratifying the amendment. For countries manufacturing HCFC-22, the first obligation will start in 2020 requiring the destruction of HFC-23. The World Bank is planning to submit a project to demonstrate technical feasibility for HFC-23 by-product mitigation or conversion technologies by undertaking technical assessment as well as financial analyses of various HFC-23 conversion technologies in comparison to HFC-23 destruction and by-product mitigation. The assessment will include review and evaluation of technical feasibility of various HFC-23 conversion technologies, determination of the capital cost of investment and recurrent costs (i.e., operating costs) of each option, and price and market for converted chemicals. Comparison of these costs for various technologies will be made in order to identify the most cost-effective option for the Multilateral Fund.
- 9. For countries with large manufacturing base, they face the dilemma of choosing low or lower-GWP alternatives with tradeoffs between safety, toxicity, cost and climate impact. In the proposed HFC enabling activities for these countries, the Bank plans to analyze all alternative technologies that are currently commercially available as well as emerging technologies and expected timeframe for these technologies to become commercially available. As part of the country strategy, comprehensive analyses for technology pathway for complying with the Amendment will be undertaken.
- 10. <u>Sustainable approach for servicing sector.</u> In reviewing potential alternatives to replace HCFC and HFC refrigerants being developed, many candidates are classified as A2L mildly flammable refrigerants or A3 flammable refrigerants. Safety concern is a significant barrier to overcome before the

market could widely adopt A2L refrigerants. For many Article 5 countries, RAC servicing sector is considered informal and most service technicians do not have formal technical training and learn their skills on the job. Attempts to improve technical capacity of service technicians for the refrigeration sector have been done previously during the phase-out of CFCs. However, due to easy entry into this trade and high turnover rate of service technicians, most technicians trained during the CFC phase-out period have already moved on to other professions. Given that training is not a mandatory requirement in most countries, very few service technicians active in the market today have undergone any training.

11. The World Bank proposes a number of activities for Thailand's Stage II HCFC Phase-out Management Plans in the 2018-2020 World Bank Business Plan. The sectors to be targeted by Thailand's Stage II HPMP will include conversion of commercial refrigeration manufactures and HCFC phase-out in the servicing sector. The Bank will consider activities to set up service technician certification system, in consultation with relevant stakeholders, that can be self-sufficient. Service technician certification system will ensure that RAC service technicians can safely perform their service and equipment will be properly installed which minimize the risk of accident during operations. This would help promote the adoption of flammable low-GWP alternatives as allowed under Thailand regulations.

### **B.** Resource Allocation in 2018

- 12. The proposed 2018 Business Plan includes deliverables of twelve investment activities in the following six countries: China, Indonesia, Jordan, Thailand and Vietnam. The total amount of funding requested for ongoing and new investment activities in the proposed 2018 Business Plan is US\$89.1 million.
- 13. The funding distribution for ongoing and new investment activities included in the proposed 2017 Business Plan is summarized below.

Table I-3: Summary of funding distribution for investment activities in the proposed 2017 World Bank Business Plan

	Total amount of funds requested in 2018 (US\$ 000s)*	Percent of total	Estimated impact in 2018 (ODP tonnes)	Percent of total
HCFC Sector Plans Stage I	3,383.57	3.5%	30.51	1.5%
HCFC Sector Plans Stage II	31,414.75	32.8%	758.24	38.4%
HCFC Production Phase-out Plan Stage I (China)	54,345.84	56.7%	1,188.00	60.1%
HFC Investment Projects	6,741.00	7.0%	N/A	N/A
Total	89,144.15	100.0%	1,976.75	100.0%

<sup>\*</sup> Figures include agency support costs

14. The total deliverables contained in the proposed 2018 World Bank Business Plan, including investment, non-investment and preparatory activities amounts to US\$58.9 million (including agency support costs and core unit costs). The breakdown of the total deliverables is summarized below.

Table I-4: Summary of all activities included in the proposed 2018 World Bank Business Plan

Type of activity included in the proposed 2016 Business Plan	Number of	Amount requested
	activities	(US\$ 000s)*

HCFC Sector Plans Stage I	1	3,383.57
HCFC Sector Plans Stage II	8	31,414.75
HCFC Gradual Production Phase-out Plan Stage II (China)	1	54,345.84
HFC Investment Projects	2	6,741.00
HFC Enabling Activities (Indonesia)	1	250.00
Institutional Strengthening	2	676.58
Core Unit Cost	1	1,735.00
Total	16	98,546.74

<sup>\*</sup> Figures include agency support costs

### C. Resource Allocation Beyond 2018

15. The breakdown of the resource allocation beyond 2018 in the 2018-2020 Business Planning is summarized below.

Table I-5: World Bank's proposed resource allocation plan for 2019-2020 (in US \$ 000s)

Type of activity	Total amount of funds requested in 2019 (US\$ 000s)	Estimated impact in 2019 (ODP tonnes)	Total amount of funds requested in 2020 (US\$ 000s)	Estimated impact in 2020 (ODP tonnes)
HCFC Sector Plan Stage II	31,740.23	61.90	22,255.95	964.11
HCFC Gradual Production Phase-out Plan Stage II (China)	54,345.84	0.00	24,046.00	5,076.00
Institutional Strengthening	0.00	N/A	676.58	N/A
Core Unit Cost	1,735.00	N/A	1,735.00	N/A
Total	87,821.07	61.90	48,713.53	6,040.11

### II. PLANNED BUSINESS ACTIVITIES

### A. Ongoing Approved Activities

- 16. Investment projects for which funding is requested in the 2018-2020 BP: As of September 2017, the World Bank's Montreal Protocol portfolio consists of six ongoing multi-year projects for which funding will be solicited in 2018-2020: HCFC phase-out management and sector plans in Argentina, China, Indonesia, Jordan, Thailand<sup>5</sup>, and Vietnam.
- 17. Non-investment projects and activities: As of September 2017, the World Bank's portfolio includes 2 ongoing institutional strengthening projects (Thailand and Jordan) that will be completed by the end of 2017.

### B. Program Expansion in 2017 and Beyond

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<sup>&</sup>lt;sup>5</sup> HPMP Stage I

18. A list of detailed new and approved activities to be implemented during 2018-2020, their associated levels of funding, projected ODP impact and country specific remarks is submitted as a separate table.

#### New submissions

- 19. HCFC consumption phase-out Stage II: As part of the World Bank 2018-2020 Business Plan, the World Bank plans to submit stage II HPMP proposals and HCFC sector plans for Thailand.
- 20. The stage II HPMP proposals for Philippines and stage II HPPMP for China have been submitted for consideration by the 80<sup>th</sup> ExCom. Stage II will involve additional closure and require careful planning to ensure that phase-out by chemical matches the situation in the consumption sectors for both domestic and global markets. To ensure achievement of the total capacity to be dismantled as per the agreement, examination at the plant level is needed to come up with options on how to meet the target.
- 21. If China Gradual Production Sector Stage II is approved by the 80<sup>th</sup> ExCom, it will start implementation in 2018, all the figures included in the business plan are based on the proposed plan as submitted.

# C. Measures to Expedite Implementation of Approved Projects and Those Critical to Compliance

- 22. 2018 will be first year that Stage II HPMPs for Philippines and Thailand and HCFC sector plans, including Argentina that was approved in July 2017, will be under implementation by the World Bank's partner countries. Consequently, the Bank will utilize all resources at its disposal to support countries in overseeing conversions in manufacturing and HCFC production phase-down while revising and introducing new policy and legislation at the sector and national levels. This support will include at minimum two supervision missions per project, greater use of video and teleconferencing, and provision of targeted technical and policy expertise as required. Alongside implementation, the Bank will ensure that is partners maintain a longer term vision of their national HCFC phase-out programs vis-à-vis MP obligations beyond 2015. It will for example, act to bridge project technical assistance activities at the country level with international technological developments so that countries may be better prepared when initiating Stage II work.
- 23. The Bank is planning to continue the organization of East Asia regional workshops again in 2018 for technical and procedural guidance to partner countries from the World Bank and external experts, exchange of views, and cross-fertilization on efficient and effective HCFC phase-out implementation. Another workshop will also be organized in 2018 to promote synergy between climate, energy efficiency and ozone activities. This workshop will be the fourth of its kind that was first successfully organized in 2015. The workshop will be complemented by sector-specific technical reviews of new and emerging low-GWP alternatives by the Bank's Ozone Operations Resource Group directed towards the specific needs of partner countries.
- 24. Lastly, in helping partner countries consider options for addressing Stage II consumption phaseout, particularly where grant funding may be limited due to eligibility, cost-effectiveness ceilings and specific sector funding boundaries, the World Bank is exploring means to better integrate the MP agenda

into its main line of work. Beyond the identification of synergies in the Bank's larger lending portfolio, there will be continuing efforts in 2018 to seek out concrete opportunities that allow ODS sector phase-out to be twinned with new projects aiming for green growth and improving energy efficiency in industry, energy, agriculture, infrastructure, and other sectors. This also include projects for Philippines, Thailand and Vietnam to improve energy efficiency in room air-conditioners with proposed funding from Kigali Cooling Efficiency Program (K-CEP).

### III. PERFORMANCE INDICATORS

25. As per Decision 71/28, the following performance indicators are included in the World Bank's 2018-2020 Business Plan:

### A. Planning--Approval Performance Indicators

26. Number of tranches of multi-year agreements approved vs. those planned (Weighting: 10)

Table III-1: Number of annual programs of multi-year agreements planned for 2018

Item	Planned	Remarks		
	for 2018			
Tranches of previously approved multi-year agreements to be presented to ExCom in 2018	5	HCFC Phase-out Plan (China, Indonesia, Jordan, Thailand <sup>6</sup> , and Vietnam)		

27. Number of individual projects/ activities (investment, demonstration projects, TAS, IS) approved vs. those planned. (Weighting: 10)

Table III-2: Number of individual projects/ activities planned for 2018

Item	Planned for 2018	Remarks
Number of projects/ activities (investment and demonstration projects, TAS, PRP, IS) approved vs. planned	5	HFC-23 demonstration project for China, HFC investment project for Thailand, TAS for Indonesia HFC enabling activities, IS projects for Jordan and Thailand

### **B.** Implementation Performance Indicators

28. Funds disbursed (Weighting: 15). In 2018, the World Bank is targeting disbursement of \$18.6 million. This is the balance of total committed funds after deducting the \$30.1 million expected to be disbursed in 2017 based on the 2016 Progress Report.

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<sup>&</sup>lt;sup>6</sup> Stage I HPMP

- 29. ODP phased-out for the tranche when the next tranche is approved vs. those planned per progress reports (Weighting: 25): In 2018, the World Bank expects to phase out a total of 235.58 ODP tons through implementation of approved multi-year projects.
- 30. Project completion vs. those planned in progress reports for all activities (excluding project preparation) (Weighting: 20): In 2018, the World Bank expects to bring to completion a total of 4 individual project activities including 2 demonstration project in Saudi Arabia and Thailand and 2 institutional strengthening projects for Jordan and Thailand.

### **C.** Administrative Performance Indicators

- 31. Speed of financial completion after project completion (Weighting: 10): The Bank has set its target for financial completion of all project activities completed in 2015 within 12 months at 90%.
- 32. Timely submission of project completion reports (<u>Weighting: 5</u>): The Bank plans to submit project completion reports as agreed with the Senior Monitoring and Evaluation Officer.
- 33. Timely submission of progress reports and responses unless otherwise agreed (Weighting: 5): The Bank plans to submit its 2018 Progress Report by the April deadline.
- 34. A summary of the World Bank's 2018 performance indicators is included in Table III-3 below.

Table III-3: Summary of World Bank's 2018 performance indicators

Category of Performance Indicator	Title	Weighting	2018 Target
Planning Approval	Tranches of previously approved multi-year agreements to be approved in 2018	10	5
	Number of projects/ activities (investment and demonstration projects, TAS, PRP, IS) approved vs. planned	10	5
Implementation	Funds disbursed based on estimated disbursement in progress report	15	18.6
	ODP phase-out for the tranche vs. that planned per progress reports	25	235.58
	Project completion vs. those planned per progress reports (excluding preparation)	20	4
Administrative	Speed of financial completion after project completion	10	90%
	Timely submission of project completion reports	5	On time
	Timely submission of progress reports	5	On time

### IV. POLICY ISSUES

35. There are no policy issues to raise at this point in time.