REGIONAL EVALUATION MUNICIPAL SOLID WASTE MANAGEMENT SERVICES



COUNTRY ANALITICAL REPORT GRENADA / EVALUATION 2002

FEBRUARY 2004



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1. EXECUTIVE SUMMARY

Grenada is an independent country located in the southern Caribbean approximately 100 miles north of Trinidad & Tobago. The country is a full member of the Organization of Eastern Caribbean States (OECS). The capital, St. Georges, is located in the southwestern portion of the Island and forms the most densely populated portion of the main island.

Control of all affairs, both internal and external, is exercised by the Central Government which is located in St. Georges. The Grenada Solid Waste Management Authority (GSWMA) is a fully autonomous statutory body within the government framework. Its origins in the Public Health Department and its operations continue (in theory at least) to be monitored by that Department.

The overall population of Grenada is slightly in excess of 104,000 as of 2003. Of these, over 95,000 live on Grenada with the balance on the smaller islands of Carriacou and Petit Martinique.

The economy of Grenada is heavily dependent on agricultural exports including cocoa, nutmeg and other spices. Bananas, which were of major importance, have declined after the European Union's action in establishing preferential tariffs. Land based tourism is not a major economic factor other than as a source of foreign currency.

The per capita waste generation rate is 0.85 kg/person/day. This low value is consistent with a relatively low (US\$4,750) Gross Domestic Product (GDP) and a low number of land based visitors. In general, the St. Georges area is not particularly attractive to tourists.

The country has 24% of all households considered to be below the poverty line. 46% of these are rated as being in indigence. The GINI coefficient is 0.505, the second highest among the OECS countries. The high value for the GINI coefficient is generally indicative of maldistribution of income and is usually consistent with high poverty levels.

Life expectancy is well below average for the OECS countries at 64.5 years.

Illiteracy rates are very low at 2% of the population with no significant difference between males and females. The education system follows the normal pattern for the Caribbean countries of British origin.

Management of solid waste disposal is centralized under GSWMA. The establishment of GSWMA was a direct result of the World Bank/Caribbean Development Bank (WB/CDB) solid waste initiatives of 1995. These initiatives in Grenada have led to much improved collection coverage, improved landfills, a firm legislative system for solid waste management and an excellent cost recovery system.

Solid waste collection in Grenada has been fully privatized, eliminating considerable load at the GSWMA administrative level as well as all potential equipment maintenance problems associated with the collection equipment. GSWMA does maintain three compactors of its own for emergency use by the collection contractors.

The main strengths of the system are the highly effective cost recovery system and the privatization of the collection services and the much improved disposal facilities when the new Perseverance landfill site comes into use.

The weaknesses of the system include the lack of full definition of responsibility and authority for the monitoring services assigned to the Public Health Department in the controlling legislation. The absence of any regulations supporting the solid waste legislation is also a major weakness.

A minor weakness exists in the delay which often occurs in the transfer of funds from the Government Consolidated Fund to GSWMA. This is a common problem in all OECS jurisdictions.

The absence of regulations backing up the legislation on solid waste may eventually be a serious limitation on GSWMA functions.

2. INTRODUCTION

The process of collecting and developing the data required for the production of Evaluation 2002 for Grenada was carried out by a PAHO representative in conjunction with the General Manager and the Operations Manager of the Grenada Solid Waste Management Authority. Additional assistance was given by other members of the Authority. The Chief Statistician of the Central Statistics Department of the Ministry of Finance and the Chief Environmental Health Officer also provided valuable information.

Grenada is an independent country within the British Commonwealth. The country consists of the main island of Grenada and the smaller islands of Carriacou and Petite Martinique, both of which lie to the north of Grenada. In addition, Grenada controls the southern portion of the Grenadines, and area much smaller than that controlled by St. Vincent that lies to the north.

Grenada is a full member of the Organization of Eastern Caribbean States (OECS). The Central Government is located in St. George's on the main island.

The overall management of solid waste is controlled by the Grenada Solid Waste Management Authority (GSWMA), a fully autonomous statutory body within the local Government structure. The formation of the GSWMA is the direct result of the mandated response to Component 3 of the World Bank/Caribbean Development Bank projects related to Ship-Generated Waste Management and Solid Waste Management which were instituted in 1995. This Component required the participating countries to establish separate entities for the management of solid waste.

The overall solid waste management picture in the OECS countries changed radically after the beginning of the WB/CDB initiatives. In Grenada, the changes included substantial improvement in the collection process, the construction of a new sanitary landfill on Carriacou, the improvement of landfill practices at the existing Perseverance Landfill on Grenada and the development of a highly successful cost recovery system associated with solid waste management. In addition, Grenada has developed a good legislative framework for the management of solid waste. Unfortunately, the there has been little progress in developing the supporting requlations for the basic solid waste legislation. A strategic waste management plan was completed in 2003.

Grenada is noted for the cost recovery system associated with solid waste management. This system, rated as a model for the other Caribbean countries, has resulted to the reduction in Government funding to less than 30% of total operating costs. No other OECS country has been as successful in reducing overall reliance on the Government for funding. By doing so, Grenada has been extremely successful in isolating the solid waste management system from variations in the level of the national economy.

While the cost recovery system is excellent in concept, it suffers from a common weakness. Funds which result from the levies on tourists, white goods and automobiles are collected in the Government Consolidated Fund and transferred to GSWMA from that fund. Transfers are frequently slow and are, to some degree, subject to Government priorities.

Direct Government funding is very low at less than 30% of the total GSWMA budget. Despite this low level, the actual receipt of the Government's share can be problematic.

The Grenada share of the WB/CDB project loans totaled US\$6.12 million with Grenada additionally contributing the equivalent of US\$2.73 million in land, taxes, duties and other costs. Of this total, US\$5.89 million was spent on solid waste management projects.

The solid waste management system in Grenada is extremely highly rated by the World Bank Implementation Completion Report (ICR). The only area which is less than highly rated is in the area of ship-generated wastes. In this area, the failure to ratify the MARPOL convention is noted as unsatisfactory within the context of the ICR. The report makes specific references to the improved collection system, the improved disposal practices and particularly to the development of the excellent cost recovery system.

Physical Characteristics

Of all the islands that make up the country of Grenada, only Grenada and Carriacou are fully relevant to this report. Petit Martinique is included where separate data are available and of note. The remaining islands are too small to have any significant influence on the overall solid waste management system.

Grenada has a land area of approximately 120 square miles (311 sq. km.) and Carriacou has a land area of 13 sq. mi. (33 sq. km.). Grenada and Carriacou both have central mountainous areas surrounded by relatively small flat costal areas. 5.9% of the land area of Grenada is classified as arable and 26.5% of the land is in permanent crops. Bananas, cocoa, nutmeg and mace make up the main agricultural exports. The popular name of the island -"The Spice Island"- refers to the high level of production of the latter products.

Bananas have declined sharply in importance as an export product since EU preferential tariffs were put into place. Grenada's economy survived this EU action better than those of St. Lucia and Dominica since its agricultural export base was more diversified.

The climate is tropical and with the islands lying at 12 degrees north, the risk of hurricanes is minimal - although not entirely absent.

Socio-Economic

The population of Grenada is estimated at 104,770 as of 2003. Of these, 94% reside on Grenada and 5% on Carriacou. For the purposes of this report, Grenada falls into the lower medium population class and Carrriacou and Petite Martinique into the lower small class. No differentiation between urban and rural populations is practical in either case.

The rate of population growth is relatively low at 0.69% annually. Although the birth rate is high at 22.87 per thousand and the death rate is relatively normal at 7.46 per thousand, the low growth rate is undoubtedly the result of a very high emigration rate of 14.56 per thousand. This is probably the result of poor economic con-

Tourism is a significant factor in the Grenada economy since it represents a major source of foreign exchange.

Ships' waste is also a minor factor in the total amount of waste that must be disposed of. Although Grenada did not ratify the MARPOL Convention, waste from the cruise ship industry is accepted and disposed of at the landfills.

Health

Overall life expectancy at birth is relatively low at 64.52 years. For males, life expectancy is 62.74 years and for females 66.31 years. These figures are surprisingly low compared to other OECS countries.

Grenada has three major hospitals, two on Grenada and one on Carriacou. There are six major health centers on Grenada and one on Carriacou. There are also 39 health clinics located on Grenada. The number of major hospitals on Grenada proper is fairly low in comparison to other OECS countries with similar populations.

Human Development Indicators

The average per capita Gross Domestic Product (GDP), at US\$4,750, is somewhat below average for the OECS group of countries. The average is, however, distorted by Antigua/Barbuda and St. Kitts/Nevis which are both very much above average.

Poverty levels by household total 24% with 46% of those households considered to be below the indigence line. The GINI coefficient is second highest in the OECS countries at 0.505 indicating a significant degree of maldistribution of wealth. The high emigration rate is usually a sign of migrant workers leaving for areas where the pay scales are higher and where income distribution may be more even. The BVI is an example of such an economy with a GINI coefficient of 0.230 and much lower poverty/indigence levels.

The illiteracy rate for the overall population is estimated at 2% with no significant differences between males and females. This is a low rate for the area.

The education system follows the British model with Government funded education to the age of 16. After that age the Government continues to fund education for those students who show exceptional promise. Grenada participates in the Commonwealth Scholarship program.

Evolution of the Solid Waste Management System

The WB/CDB Solid Waste Projects have resulted in substantial improvements in the solid waste management systems in Grenada. With the exception of the component on ship-generated wastes (rated as satisfactory in the World Bank Implementation Completion Report) all component outcomes are rated as highly satisfactory. The satisfactory component is so rated because of the failure to pass the enabling legislation and the failure to ratify the MARPOL Convention. The actual handling of ship generated waste is fully satisfactory.

The functional development of the GSWMA is a direct result of the WB/CDB initiatives. The Authority is currently fully staffed with the core positions filled with technically competent people. Since its inception the authority has achieved significant improvements in collection services, disposal methods and facilities and has instituted a fee recovery structure second to none in the OECS countries for its effectiveness in reducing dependence on Government funding.

Street sweeping and collection services are now fully contracted out to private contractors. This privatization has the effect of reducing the direct supervisory load on GSWMA while relieving the Authority of the need for collection equipment maintenance and/or replacement. The Grenada situation is now similar to that found in Anguilla - although Anguilla operates on a much smaller scale. Collection services have improved from less than 50% coverage to essentially 100% coverage. Frequency of collection is high at twice per week in rural areas and six times per week in St. Georges and vicinity.

Street sweeping is restricted to the urban areas within the town limits. There is some evidence of litter, even in those areas, which leads one to believe that the efficiency of service may not be totally acceptable.

GSWMA has retained control of all disposal services with all of the collected waste being received either at the existing Perseverance site in Grenada or the new Dumfries site in Carriacou. Landfill management has improved greatly with open burning and pest infestation eliminated completely.

A landslide caused by heavy rains in late 2001 interfered with the operation of the new Perseverance landfill site. In the interim, the old landfill has been put back into service. Repairs to the damaged cell have been delayed by the need to assess the causes of the landslide and mitigative measures required to prevent a recurrence.

The older Perseverance landfill is, at best, a controlled landfill as opposed to a modern sanitary landfill. Its continued use for more than two years after the damage to the new site suggests that the problems with the new site are of major proportions.

Perhaps the most notable achievement of GSWMA is the development of a uniquely effective cost recovery system. This system consists of three major sections, an environmental levy, a direct household service charge linked to the monthly electricity bills and a levy on the sale of "white goods". These levies and fees have yielded 12%, 16% and 39% of operating costs respectively in the period 1997 to 2002. Over the same period, Government contributions have been reduced to less than 30% of operating costs.

There is also a levy on incoming vehicles (1% of CIF) to provide for the eventual disposal of derelict vehicles.

The basic solid waste management system in its current form appears to operate in a fully satisfactory manner. Further development in the near future does not appear to be likely.

Some clarification in the legislative definition of the monitoring function of the Public Health Department would be desirable. The current interplay between the two bodies is wholly functional with little duplication of effort but both would benefit from a somewhat clearer definition of responsibility and authority in this area. There appears to be very little friction in the relationship but GWSMA views its function as strictly operational. This appears to leave a gap in the area of policy development. This may be reflected in the failure to develop the regulatory structure required to support the existing legislation.

Level of Investment

The total level of investment in the WB/CDB projects amounted to US\$8.85 million with Grenada providing the equivalent of US\$2.73 million in land, tax exemptions and duty exemptions. The remainder of the funding (US\$6.12 million) was obtained from the lending organizations. The funding included US\$0.23 million for projects not associated with solid waste management.

This level of investment, equivalent to EC\$23.63 million, represents essentially all investment in the solid waste management systems since 1995.

The still outstanding repairs to the damaged landfill cell at the new Perseverance site will require a major expenditure. Funding is expected to be from CDB, the original funding source.

Other than the repair costs, investment should be limited to maintenance costs on landfill related equipment. This is, of course, a major advantage gained by the high level of contracted services, particularly in the collection area.

4. FUNCTIONAL OPERATIONAL STRUCTURE

Institutional Structure

The solid waste management structure in Grenada represents a progressive development dating back to the inception of the WB/CDB initiatives in 1995. Along with St. Vincent, the system represents a model for the other OECS countries. This is especially true in the cost recovery area where Grenada has been even more successful than St. Vincent in reducing direct Government funding. Both continue to suffer from the common problem of slow payment of funds from the Consolidated Fund.

The system appears to be completely functional and fully staffed with competent personnel. There appears to be adequate depth in GSWMA staffing at the administrative level. Total staffing is relatively low reflecting the high level of privatization.

The improvements in collection and disposal services, combined with the excellent cost recovery structure and the apparently strong management structure in GSWMA give a high probability of sustainability to the system.

Policies, Legal and Regulatory Framework

Grenada passed the Solid waste Management Act in 2001. In addition, an Integrated Solid Waste Management Strategy was completed in 2003. No progress has been made on the supporting regulatory structure for the legislation.

The legal framework functions satisfactorily in its present form. The only area of potential weakness arises from the failure to pass the ship-generated waste bill by the Legislature. This bill was withdrawn when there was a late objection by the Port Authority. In addition, Grenada failed to ratify the MARPOL Convention Annex V because there was some doubt as to whether compliance with Annexes I and II was possible.

To date there has been no progress in developing the supporting regulations for the legislative structure. While this is not the direct responsibility of GSWMA, the lack of applicable regulations presents an occasionally serious problem in their functioning. The apparent gap in areas of responsibility for policy development has been previously noted.

Assuming that the regulatory structure was to be developed and approved there would appear to be a solid legislative and legal basis for solid waste management in Grenada. The current legislation could, however, be improved by a better definition of the monitoring and enforcement responsibilities of the Public Health Department. GSWMA does not favour a self-monitoring solid waste management system.

Centralization of Service

Solid waste management services are fully centralized under GSWMA. The fact that sweeping and collection services are fully privatized out does not alter this fact.

Street Sweeping

Street sweeping is the responsibility of GSWMA, unlike other OECS countries where this function remained the responsibility of the Public Health Departments. GSWMA has contracted out the service to the collection contractors in line with their policy of privatization. Street sweeping is limited to the town limits in the urbanized areas only. There are relatively few people involved in street sweeping in comparison to other OECS countries.

There is some evidence of litter in some of the areas that should be subject to cleaning. This leads to some question as to the efficiency of the service as it is currently operated.

Given the limited areas that are subject to sweeping, no more than 30% of the country can be considered to be covered.

Planning

GSWMA is fully responsible for planning in the solid waste management area. No major plans or projects affecting GSWMA's structure or status appear to be in existence at present.

Long term environmental planning is not within the mandate of GSWMA. As in all countries where landfills are the only means of disposal, there are serious concerns as to the long term viability of landfill alone as a means of solid waste disposal.

5. DELIVERY OF SOLID WASTE MANAGEMENT SERVICES

Quality and Coverage of Services

Collection coverage in Grenada, Carriacou and Petit Martinique is essentially 100%. Collection frequency in the general areas outside St. Georges is high at twice per week. The heavily urbanized areas in and around St. Georges receive daily (except Sunday) pickup service.

Carriacou and Petit Martinique receive equivalent service to the rural areas of Grenada. Waste from Petit Martinique is transported to Carriacou for disposal.

The privatization of the collection services has done much to ensure a high level of quality of service. There is some evidence that it has also resulted in a somewhat higher unit cost for solid waste management.

Disposal services are good with essentially 100% of collected material reaching an appropriate landfill. The damage to the new Perseverance landfill has been a setback but the old site has been pressed into service pending repairs to the new site.

Cost Analysis

The unit cost for solid waste disposal in Grenada is US\$82.79 per ton. This figure is well within the normal range for landfill disposal although it is somewhat above the average for other Caribbean countries. There appears to be some correlation in this case between the degree of privatization of services and unit costs for management services. Both Anguilla and Grenada have highly privatized services and unit costs that are higher than average. Anguilla's situation is even more notable since the unit cost structure showed a significant increase as the degree of privatization increased.

Municipal Development

Municipal development is not a major factor in either solid waste generation or disposal. Waste from these sources tends to be segregated when it reaches the landfills and it is frequently used as road base material in the construction of new roads.

Administration

GSWMA is fully staffed at the administrative level. Overall control is exercised by the General Manager who reports to the Board of Directors. He is supported by an Operations Manager who, in turn, has adequate secondary support.

GSWMA also has a fully developed administrative structure in the accounting, public relations and employee relations areas.

The high degree of privatization has the effect of greatly simplifying the organizational structure and function at the operations level.

Shared or Participatory Management

There is no shared or participatory management in the current solid waste management system. The Environmental Health Department is not a direct part of the GWSMA management structure despite its monitoring function.

Small Business Involvement

The only small business involvement is in the privatized collection and sweeping services. This includes the private collection of industrial, commercial and institutional (ICI) wastes which are paid for by the generators as opposed to GSWMA.

In this case, the ICI wastes (which make up approximately 45% of the total waste stream) are collected by private contractors who are directly paid by the generators. No tipping fees are normally charged for this waste at the landfill sites. There may, however, be a fee charged if the amount of waste is considered to be excessive.

It has been notable that the private collection contractors tend to purchase and operate Japanese made vehicles as opposed to the British or European produced vehicles apparently favoured by WB/CDB. These latter vehicles have been a serious maintenance problem in St. Vincent.

There is a tendency for the smaller generators of ICI waste to combine this more specialized waste with domestic waste. This, of course, reduces the generator's cost.

Micro Enterprises

No micro enterprises are involved in solid waste disposal in Grenada.

Sector Projects

The repairs to the damaged cell at the Perseverance Landfill site are ongoing at the present time. The damage was extensive enough to force a major assessment prior to the commencement of repairs. While this is not a major sector project, it is the only major solid waste oriented project currently active.

Funding

Current funding for solid waste management is as follows:

1 Direct fee structure: 16%

2. Environmental Levy: 12%

3. Levy on White Goods: 39%

4. Government Contribution: 28%

5. Other funding: 5%

The very low level of direct Government contribution is a major protection against the effect of shortfalls in Government funding caused by poor national economic conditions. The problems experienced in Antiqua, Dominica and St. Kitts due to this type of shortfall are thereby avoided. The problem of delayed transfers from the Government's Consolidated Fund continues, however.

The fee structure is complex - if highly effective.

Domestic waste charges are as follows:

- For households with electricity usage less than 100 kwh per month there is no charge. (This constitutes the majority of the households)
- For households with electricity usage of 100 to 150 kwh per month the charge is EC\$5.00 added to the monthly electricity bill.
- For households with electricity usage of more than 150 kwh per month the charge is EC\$10.00 per month added to the monthly electricity bill.

ICI waste charges are as follows:

- For normal amounts of ICI wastes picked up by a private contractor there is no tipping fee at the landfill.
- For abnormally large amounts of ICI waste there is a tipping fee of EC\$75.00 per ton.

Construction waste charges are as follows:

- For waste that is collected, hauled and disposed of by GSWMA there is a fee of EC\$105.00 per ton.
- For waste that is collected and hauled by others there is a fee of EC\$75.00 per ton.

Abandoned vehicles are not charged for directly but are covered by an import levy of 1% on the assessed CIF value at the time of import.

There is also a levy on white goods charged at the time of import and an environmental levy on departing airline passengers.

GSWMA, as a statutory body, develops its own budget for approval by its Board of Directors. The Government portion of the budget is considered to be payment for services received in the solid waste area and as such is not directly subject to Government approval. At the same time, payment of the Government share is, to some degree, at its own discretion.

6. STRENGTHS AND WEAKNESSES OF THE SYSTEM

Strengths

The major strengths of the system lie in the solid legislative framework which backs up the solid waste operation and in the excellent cost recovery system which, to a large extent, eliminates most of the dependence on Government for funding.

The high degree of privatization of the collection and sweeping services also decreases the administrative load which would be required for operation and maintenance of a fleet of collection vehicles.

The management of GSWMA has a good degree of depth at the administrative level. This tends to provide a good deal of stability.

Weaknesses

The WB/CDB mandated separation of solid waste management functions from direct control of the Public Health Department has generally caused some friction between the two entities.. This continues to be the case in Grenada - although to a very minor extent.

The lack of a clear legislative definition of the monitoring function of the Environmental Health Department is a source of some frustration. It is not, however, a major problem area from the standpoint of GSWMA.

Slow payments from the Government Consolidated Fund remain a problem.

Limiting Factors

The absence of a regulatory framework to back up the legislation on solid waste management will eventually become a limiting factor on operations of GSWMA.

7. HEALTH, ENVIRONMENT, AND SOCIAL DEVELOPMENT

Health and Environment

There is no evidence that there are any diseases directly linked to the disposal of solid waste in Grenada. Dengue fever, while perhaps the most likely, is not currently a major problem on the island. Waste tires, a common source of mosquitoes, are disposed of by burning at the landfill eliminating this vector source as other than a short term problem.

Epidemiological Studies

Since there are no diseases that can be directly linked to solid waste disposal, no epidemiological studies have been undertaken in this area. Unless there is a definite linkage no studies are planned for the future.

Occupational Health

There are no occupational health problems that are directly associated with the solid waste management system.

Economic Value

The land based tourist industry is not currently a major factor in Grenada's economy. The Government, however, is proposing to undertake steps to enhance the industry locally. Improper waste disposal practices inevitably have a negative impact on tourism and this effect would certainly be magnified when any effort to increase the level of land based tourism was undertaken.

Equity of Service

The level of service appears to be fully equitable.

8. PARTICIPATORY MANAGEMENT

Community Participation

There is no significant community participation in solid waste management in Grenada. GSWMA believes that some public participation may be developing, but the full extent is not clear at present.

Non-government Organizations (NGO's)

No non-government organizations are currently involved in the solid waste management system.

Hygiene and Occupational Safety Programs

There are no current programs in this area.

Scavenging of Waste

While no official scavenging occurs at the landfill site, there are generally six to eight scavengers present. The actual number varies from time to time depending on other employment conditions. Both men and women are involved. Materials scavenged are generally glass, metals and occasionally plastic.

Recycling

While there is no formal recycling program for glass operated by GSWMA, two local bottling companies operate a deposit/return system for beer and soft drink bottles. The recovered bottles are reused locally. These programs appear to recover 80-85% of the bottles on which there is a deposit.

In addition, there is a deposit on other glass which can be shipped off island to St. Lucia, St. Vincent or Trinidad for reuse by bottling companies located on the receiving island. This program appears to be somewhat more complex in application, but is also effective in reducing the amount of glass reaching the landfill.

Compared to the BVI, where 18% of the waste stream is glass, only 7% of the Grenada waste stream is in this class. This appears to indicate that the deposit/return system is effective in removing approximately 50% of the glass from the waste stream. This is typical of the performance of this type of system in the OECS countries where it exists.

GSWMA is also encouraging the composting of green waste at source. The effectiveness of this program is currently uncertain.

9. FUTURE PROSPECTIVES

Investment and Reorganization

The investment occasioned by the WB/CDB projects represents all of the investments that are likely to be required, at least in the short to medium term.

The solid waste management system is fully developed and stable in its present form. No reorganization is required and none is contemplated.

Reform and Modernization

Neither is required nor is either contemplated.

Alternative Management Systems

None are under consideration at the present time.

Regulation

There is a need for the development of a set of regulations associated with the Waste Management Act of 2001. Until these regulations are developed and passed, there will continue to be some limitation on GSWMA operations. To date there has been no progress in this area.

Financial Requirements

The excellent cost recovery system combined with the normal operation of a statutory body has essentially satisfied all current financial requirements of GWSMA.

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11. ACRONYMS

CDB Caribbean Development Bank

EC Eastern Caribbean (currency)

GDP Gross Domestic Product

GINI coefficient of income distribution

GSWMA Grenada Solid Waste Management Authority

ICG Implementation Completion Report

Marine Pollution (Convention) **MARPOL**

NGO Non-Government Organization

Organization of Eastern Caribbean States **OECS**

PAHO Pan American Health Organization

US United States (currency)

WB World Bank

12. WORKING TEAM

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