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SECOND MONITORING REPORT ON THE CONSULTATION PHASE AGREEMENTS

RECONQUISTA RIVER BASIN ENVIRONMENTAL SANITATION PROGRAM

(AR-L1121)
(3256/OC-AR)

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LINKS	
1.	Original request (expansion of the lower basin) https://www.iadb.org/document.cfm?id=EZSHARE-447996201-158
2.	Case file of Request MICI-BID-AR-2019-0148 in the MICI-IDB Public Registry https://www.iadb.org/en/mici/complaint-detail?ID=MICI-BID-AR-2019-0148
3.	Consultation Phase Report https://idbg.sharepoint.com/teams/ez-MICI/cases/_layouts/15/DocIdRedir.aspx?ID=EZSHARE-447996201-195
4.	Final agreement https://www.iadb.org/document.cfm?id=EZSHARE-447996201-203
5.	Program profile for the Reconquista River Basin Environmental Sanitation Program (AR-L1121) https://www.iadb.org/Document.cfm?id=EZSHARE-1557453903-2
6.	Loan proposal for the Reconquista River Basin Environmental Sanitation Program (AR-L1121) https://www.iadb.org/Document.cfm?id=EZSHARE-899088300-21
7.	Environmental and social management report for the Reconquista River Basin Environmental Sanitation Program (AR-L1121) https://www.iadb.org/Document.cfm?id=38151058
8.	Update of the global environmental and social impact assessment for the Reconquista River Basin Environmental Sanitation Program (AR-L1121) https://www.iadb.org/Document.cfm?id=EZSHARE-735565658-207

ABBREVIATIONS

ADA	Autoridad del Agua [Water Authority]
Bank or IDB	Inter-American Development Bank
Board	The Board of Executive Directors of the IDB
COMILU	Comité de Cuenca del Río Luján [Luján River Basin Committee]
COMIREC	Comité de Cuenca del Río Reconquista [Reconquista River Basin Committee]
GELFI	Gestión de Efluentes Líquidos con Fortalecimiento Industrial [Management of Liquid Effluents with Industrial Strengthening]
Management	The IDB Group manager or managers in charge of the relevant IDB Group-financed operation or any delegate thereof
MICI or the Mechanism	The Independent Consultation and Investigation Mechanism of the IDB
MICI Policy	Policy approved by the Board of Executive Directors of the IDB on 16 December 2014 and updated on 14 April 2021, governing the work of the MICI regarding Requests related to operations financed by the IDB or the MIF (document MI-47-6).
OPDS	Organismo Provincial para el Desarrollo Sostenible [Provincial Sustainable Development Agency]
Parties	The Requesters, Management, the borrower, the client and/or the executing agency, if applicable
PGICRR	Reconquista River Basin Comprehensive Management Plan
Program	Reconquista River Basin Environmental Sanitation Program (AR-L1121)
SCEOCI	Subsecretaría de Coordinación con Estados y Organismos de Crédito Internacionales del Ministerio de Economía de la Provincia de Buenos Aires [States and International Credit Agencies Coordination Branch of the Ministry of Economy of the Province of Buenos Aires]
UCEPO	Unidad de Coordinación y Ejecución de Proyectos de Obra del Ministerio de Infraestructura de la Provincia de Buenos Aires [Works Coordination and Execution Unit of the Ministry of Infrastructure of the Province of Buenos Aires]

EXECUTIVE SUMMARY

The Reconquista River Basin Environmental Sanitation Program (loan AR-L1121) is financed by the Inter-American Development Bank (IDB) through a sovereign guaranteed loan operation under the multiple-works modality for a total amount of US\$230 million with US\$57.5 million in local counterpart funding. The executing agency is the States and International Credit Agencies Coordination Branch (SCEOCI) of the Ministry of Economy of the Province of Buenos Aires, and the Works Coordination and Execution Unit (UCEPO) of the Ministry of Infrastructure is the subexecuting agency responsible for technical coordination of the program. The operation was approved by the Board of Executive Directors on 23 July 2014 and is now in implementation.

The program, which is the third operation financed by the IDB in the Reconquista River Basin, aims to restore the environmental quality of the basin by implementing a Reconquista River Basin Comprehensive Management Plan (PGICRR) that will prioritize investments targeting communities in areas where there are health risks. These works will help: (i) increase water, sewer, and wastewater treatment coverage; (ii) enhance integrated solid waste management, primarily by closing open air dumps; (iii) improve connectivity and access to outlying neighborhoods in hard-to-reach areas; (iv) strengthen the operational management capacity of the Reconquista River Basin Committee (COMIREC) by developing management tools.

On 7 May 2019, the Independent Consultation and Investigation Mechanism (MICI) received a Request regarding the program from a group of individuals acting on their own behalf, who reside in municipios located in the Reconquista River Basin. The group of Requesters indicated that the basin's current, highly polluted state not only causes environmental harm, but also poses serious health risks for the residents of the islands of the Paraná Delta (San Fernando and Tigre), because what happens upstream affects the Luján, Carapachay, and Paraná rivers. According to the Requesters, their only water source has been severely affected by the pollution of the Reconquista River. Their concerns about the program relate to the potential harm that could arise from a possible intensification of adverse effects experienced as a result of their specific problems not being taken into account as part of a comprehensive approach to the basin. In particular, they state that the construction of the Drainage Canal/National Rowing Course changed the hydrological dynamics of the lower basin, bringing the Reconquista's waters to higher grounds than the original outfall. Lastly, the Requesters said this situation has caused harm to their health and quality of life because the delta has become the final destination of the discharge of these highly polluted waters.

The Request was declared eligible by the MICI on 3 August 2019 and was transferred to the Consultation Phase.¹ During the Assessment stage, IDB Management, UCEPO, COMIREC, and the group of Requesters expressed their willingness to begin a process to

¹ The [Eligibility Memorandum](#) found that only 9 of the 13 Requesters raised allegations that meet the definition of harm in the MICI Policy. Importantly, that the MICI considers that the Request did not provide enough information to classify the Requesters from the upper and middle basins as parties who may be directly harmed, based on the definition of harm in the MICI Policy. Therefore, the processing of this Request focused on the allegations of potential direct harm raised by the other Requesters. Additionally, during the Consultation Phase Assessment, two of the initial Requesters from the middle basin officially notified the MICI that they did not wish to continue processing their allegations under the MICI framework. Later, two initial Requesters from the middle and upper basins notified the MICI that they also did not wish to continue with the MICI process.

explore sustainable solutions to the concerns raised in the Request. In light of the specific context, as Argentina was in the midst of its national, provincial, and municipal elections at that time, the Parties indicated that they preferred to start the process after the 27 October 2019 elections had taken place. Accordingly, the MICI organized and facilitated two dialogue sessions on 4 and 5 November 2019 at the IDB Country Office in the city of Buenos Aires. On 5 November, the Parties reached an agreement that set forth a series of measures designed to address the pollution concerns described in the Request. In particular, the Agreement includes actions or works to mitigate pollution in the Drainage Canal. It also lists specific locations for water quality monitoring stations, effluent mapping, and industrial oversight. Lastly, it includes the requirement that an analysis of the cumulative social and environmental impact on the delta be conducted for each work financed under the program. At the request of the Parties, the MICI performs monitoring tasks and facilitates monitoring meetings between the Parties to review progress toward compliance.

This report discusses the activities carried out in the period from February 2021 to May 2022. The COVID-19 pandemic and the restrictions imposed to mitigate its spread affected both execution and monitoring activities. For these reasons, it was only possible to conduct a field mission in May 2022. Over this period, four MICI-facilitated meetings of the Monitoring Committee were held—one in-person and three virtual—as well as three meetings of the working group to find alternatives to point 1 of the Agreement. The MICI also remained in constant contact with the Parties through bilateral meetings to ascertain and jointly evaluate progress toward compliance with the commitments.

In the second year of monitoring, the MICI recorded progress on implementation of the commitments in the MICI Agreement. Specifically, 80% of the sampling points identified in the Agreement were monitored in 2021, and UCEPO and COMIREC shared two monitoring reports for the Luján River basin and two for the Reconquista River basin with the group of Requesters. Additionally, through UCEPO and COMIREC, the Water Authority (ADA) has shared annual updates on the industries involved in the program for Management of Liquid Effluents with Industrial Strengthening (GELFI), as well as information on the inspections and objections raised with different industries in the delta during 2021. An analysis of the cumulative impact on the delta is included in the environmental and social impact assessments for all works that obtained IDB Management's no objection in the review period.

However, the MICI observed little progress in relation to actions/work to mitigate pollution in the Drainage Canal. The COMIREC analysis of hydraulic operations at the Reconquista River – Drainage Canal fork revealed possible incompatibilities for building a fixed crest overflow spillway with the tested heights. In February 2022, the Parties agreed that an impartial body would study alternatives, to find a technical solution that addresses the problem of pollution in the Drainage Canal. The Requesters shared comments for the executing agency's consideration on the terms of reference for commissioning the study, and the process has a work plan and estimated timetable.

Although IDB Management, UCEPO, COMIREC, and other agencies have made efforts to share information, ways of reporting water quality monitoring data from the agreed locations, as well as data on effluent mapping and industrial oversight at the locations listed in the Agreement, should be established that are sustainable over time. The PGICRR represents an opportunity to ensure ongoing adherence to the agreed commitments beyond the time frames established in the MICI Policy.

In 2022 and 2023, the MICI will continue with its monitoring activities by organizing and facilitating virtual and in-person monitoring sessions. The MICI will field at least one mission to Tigre and La Plata in the second half of 2022, to facilitate in-person monitoring meetings and evaluate progress toward compliance with the Agreement. In May 2023, it will issue the Third Annual Monitoring Report, which will discuss the actions taken and the progress achieved.

I. BACKGROUND

- 1.1 The Reconquista River Basin Environmental Sanitation Program (loan AR-L1121) is financed by the Inter-American Development Bank (IDB) through a US\$230 million multiple works investment loan operation with US\$57.5 million in local counterpart funding. The Ministry of Infrastructure of the Province of Buenos Aires is responsible for technical coordination of the program, through its Works Coordination and Execution Unit (UCEPO). The operation was approved by the IDB Board of Executive Directors on 23 July 2014 and is now in implementation.
- 1.2 The operation was designed as a continuation of a series of interventions related to the basin and financed by the IDB. In 1993, the Board of Executive Directors approved the “Reconquista River Sanitation” project (loan AR0038, loan 797/OC-AR), completed in 2006. That financing focused on: (i) flood control; (ii) decreased industrial and household pollution; and (iii) improved management and regulation of the Reconquista River Basin. The legal framework for the creation of the Reconquista River Basin Committee (COMIREC) was also developed under that program. Later, the Province of Buenos Aires requested IDB support through a technical cooperation operation, “Program for the Sustainable Management of the Reconquista River Basin” (operation AR-T1083, technical cooperation operation ATN/OC-12571-AR), approved in December 2010. That operation sought to produce technical studies for a future program in the Reconquista River Basin. More specifically, it entailed the preparation of terms of reference and documents for design of the Reconquista River Basin Comprehensive Management Plan (PGICRR), as well as the development of an institutional strengthening plan for COMIREC.
- 1.3 The Reconquista River Basin Environmental Program (loan AR-L1121), which is the subject of the Request, was designed on the basis of two criteria: (i) to address the priorities for the basin identified by the Province of Buenos Aires, based on operation AR-T1083; and (ii) to supplement and expand the actions not carried out under loan 797/OC-AR. To address these criteria, the program has four components: (i) **water and sanitation**, which includes the construction and rehabilitation of water supply networks and sewer systems; (ii) **solid waste**, for the development of plans for the basin’s municipios and the closing and remediation of three open air dumps; (iii) **roadways, accessibility, and drainage**, for investments in road infrastructure and supplementary works, and (iv) **environmental and social management**, to finance environmental and social management actions, including the consulting assignment for preparing the PGICRR and industrial and urban pollution abatement actions to be given priority during the plan’s preparation, as well as implementation of water, sediment, and air quality monitoring and early warning systems.
- 1.4 On 7 May 2019, the Independent Consultation and Investigation Mechanism (MICI) received a Request regarding the program from six individuals acting on their own behalf, all of whom reside in municipios located in the Reconquista River Basin.² On 25 July 2019, the Requesters submitted an additional document to

² During the eligibility phase, one of the individuals who had signed the Request decided to withdraw due to a potential conflict of interest, and another eight individuals added their names to the Request.

supplement the original Request, providing further details on the allegations of potential harm, and another eight residents joined the initial group of Requesters.

- 1.5 The Request alleged that the entire basin's current, highly polluted state not only causes environmental harm, but has also posed serious health risks for the residents of the islands of the Paraná Delta (San Fernando and Tigre), because what happens upstream affects the Luján, Carapachay, and Paraná rivers. According to the group of Requesters, their only water source has been severely affected by the pollution of the Reconquista River. The Requesters' concerns about the program relate to the potential harm that could arise from a possible intensification of adverse effects experienced in the lower basin as a result of their specific problems not being taken into account as part of a comprehensive approach to the basin. In particular, they state that the construction of the Drainage Canal/National Rowing Course changed the hydrological dynamics of the lower basin, bringing the Reconquista's waters to higher grounds than the original outfall. According to the information provided by the Requesters, this situation has caused harm to their health and quality of life because the delta has become the final destination of the discharge of these highly polluted waters. Rising water levels often cause floods in certain parts of the municipios on San Fernando and Tigre islands.
- 1.6 The Request was declared eligible on 3 August 2019. The [Eligibility Memorandum](#) found that only 9 of the 13 Requesters³ raised allegations that meet the definition of harm set forth in the MICI Policy. Therefore, processing of the Request by the MICI would focus on potential noncompliance associated with those allegations in particular. With the issuance of the Eligibility Memorandum, the Request was transferred to the Consultation Phase.
- 1.7 During the Consultation Phase, IDB Management, UCEPO, COMIREC, and the group of Requesters expressed to the MICI their willingness to begin a process to explore sustainable solutions to the concerns raised in the Request. In light of the specific context, as Argentina was in the midst of its national, provincial, and municipal elections at the time of the assessment, the Parties indicated that they preferred to participate in the process after the 27 October 2019 elections had taken place.
- 1.8 Accordingly, the MICI organized and facilitated two consecutive dialogue sessions on 4 and 5 November 2019 at the IDB Country Office in the city of Buenos Aires. During the first session, the Parties validated the rules for participation to ensure an effective use of time and maximize participation. They also validated the agenda of topics, which had been drafted with the group of Requesters during the Assessment stage and shared with UCEPO, COMIREC, and IDB Management for comments prior to the dialogue session. Lastly, the Parties began to address the topics of the validated agenda. During the second dialogue session on 5 November, the Parties reached an agreement that set forth a series of measures

³ Importantly, the MICI considers that the Request did not provide enough information to classify the Requesters from the upper and middle basins as parties who may be directly harmed, based on the definition of harm in the MICI Policy. Therefore, the processing of this Request focused on the allegations of potential direct harm raised by the other Requesters. Additionally, during the Consultation Phase Assessment, two of the initial Requesters from the middle basin officially notified the MICI that they did not wish to continue processing their allegations under the MICI framework. Later, two initial Requesters from the middle and upper basins notified the MICI that they also did not wish to continue with the MICI process.

designed to address the concerns described in the Request. In particular, the Agreement includes actions to mitigate pollution in the Drainage Canal by creating a water overflow spillway or another action that addresses the problem. The Agreement also includes measures to strengthen water quality monitoring and effluent mapping, as well as a requirement that an analysis of the cumulative impact on the delta be included for all works financed by the program.

- 1.9 The Parties asked the MICI to participate in the monitoring of the actions set forth in the Monitoring Plan and Timeline that was approved by the Board of Executive Directors on 16 December 2019 via the no objection procedure. Monitoring sessions are facilitated on the MICI's behalf by Eliana Spadoni, a member of the Mechanism's roster of facilitation experts who has worked on this case since she was selected in the Consultation Phase process.
- 1.10 In March 2021, the MICI issued its First Monitoring Report on the Consultation Phase Agreements, which covered the period from November 2019 to January 2021. The MICI noted that the analyses of the modeling required to prepare the alternatives study for Drainage Canal works were being done during that time. It observed that the water quality monitoring plan, which covers 70% of the locations listed in the Agreement, was in the final stages of preparation, and UCEPO and COMIREC had shared information on two water quality monitoring exercises conducted by COMIREC and the Water Authority (ADA) in 2020 at several points in the basin. Regarding effluent mapping and discharge control, UCEPO and COMIREC had shared a report on the inspections conducted by the Provincial Sustainable Development Agency (OPDS) at various industrial sites in the delta in 2019 and the first half of 2020. Regarding environmental and social impact on the delta, IDB Management had reported that an analysis of the cumulative impact on the delta was included in the environmental and social impact assessments for each of the three works that had obtained no objections in 2020. The MICI found that implementation of the actions described in the Agreement had taken longer than originally agreed. This delay was the result of a challenging context, with the restrictions imposed in response to the COVID-19 pandemic and contractual challenges in the design of the Reconquista River Basin Comprehensive Management Plan (PGICRR) and delivery of the hydrodynamics model for the basin.
- 1.11 Background information on case MICI-BID-AR-2019-0148 and public documentation prepared during the process can be consulted in the [case file](#) on the MICI Public Registry.⁴

II. MICI POLICY AUTHORITY FOR THE MONITORING OF AGREEMENTS

- 2.1 Paragraph 35 of the MICI Policy (document MI-47-8) states that, if the Parties have reached an Agreement during the Consultation Phase process, the MICI will develop, in consultation with the Parties, a monitoring plan and time frame for the agreement reached, when applicable. The duration of the plan is not to exceed five years.

⁴ The relevant public documents can also be accessed via the links section.

- 2.2 Pursuant to paragraph 35 of the MICI Policy, the MICI will submit a monitoring report to the Board for information at least annually.

III. ACTIONS DURING THE REPORTED MONITORING PERIOD

- 3.1 In-person contact and missions to project sites are essential for the execution of activities during all stages of the Consultation Phase. The COVID-19 pandemic and the restrictions imposed to mitigate its spread affected both execution and monitoring activities. As pandemic-related conditions relaxed, the MICI conducted a monitoring mission in May 2022. For that reason, to provide a more detailed description of monitoring tasks and implementation status, this report covers activities between February 2021 and May 2022. The paragraphs below discuss the monitoring activities, which adhered to the guidelines set out in the “Guidance Note for Accessible and Secure Remote Case Management.”
- 3.2 **Monitoring missions.** No mission could be completed in 2021 due to the measures instituted to contain the COVID-19 pandemic. However, the MICI fielded a monitoring mission in May 2022, when it met with the IDB, UCEPO, COMIREC, and the group of Requesters, as well as held a plenary meeting of the Monitoring Committee.
- 3.3 **Bilateral and Monitoring Committee meetings.** The MICI facilitated four meetings of the Monitoring Committee—three virtual and one in-person—as part of the May 2022 monitoring mission. All meetings of the Monitoring Committee were preceded by preparatory sessions with each Party, attended by the facilitator, the Consultation Phase Coordinator, and the Case Officer.
- 3.4 **Working group for implementation of point 1.** The MICI introduced a methodological change in the second half of 2021, due to difficulty identifying actions/work to mitigate pollution in the Drainage Canal. The change was to create a working group with the objective of advancing implementation of the first point of the Agreement at the heart of the case. The shift in methodology sought to avoid burnout and explore possible interventions through a group with fewer participants meeting for shorter and more frequent sessions that would create more momentum in finding solutions. The MICI facilitated three sessions of the working group, attended by two representatives of each Party to the MICI process, the facilitator, and the Case Officer.
- 3.5 **Periodic contact between the MICI and the Parties.** During the period observed, the MICI maintained weekly contact with each of the Parties through phone calls, WhatsApp messages, and email exchanges. It also facilitated various meetings at the request of the Parties, when necessary. The MICI took advantage of these exchanges to solicit each Party’s views on the status of compliance with the agreements, identify challenges for execution of the agreed activities, and propose possible actions to address them.
- 3.6 **Monitoring of media and relevant events.** During the period observed, the MICI regularly monitored the press, social media, online portals, and events to identify relevant contextual information that could have an impact on execution of the agreed activities and their monitoring.

- 3.7 **Status of compliance.** The following was observed as of May 2022:
- 3.8 Water overflow spillway in the Drainage Canal or another action that addresses the problem. In March 2021, UCEPO and COMIREC shared a preliminary analysis of flows at the Drainage Canal – Reconquista River fork with the group of Requesters through the MICI. The analysis used the hydrodynamic modeling developed under the program and presented scenarios with a diversion weir at the entrance to the Drainage Canal. At a May 2021 plenary session, COMIREC presented new findings of the analysis of hydraulic operations at the Reconquista River – Drainage Canal fork that revealed possible incompatibilities for adding a fixed crest overflow spillway with the tested heights, since this might cause overflows upstream of the fork.
- 3.9 Given these findings, the MICI facilitated three working group sessions in the second half of 2021 to make progress on identifying actions/work to mitigate pollution in the Drainage Canal. The sessions were attended by a smaller group of representatives of the Parties and explored possible actions to address the problems identified in point 1 of the MICI Agreement.
- 3.10 In December 2021, the group of Requesters sent a letter to the representatives of Argentina at the Bank, expressing frustration with the delay in implementing this commitment. In it, they stated that, if no progress was made in the first half of 2022, particularly in the development of a mitigation option regarding the first point of the agreement, they would request the transfer of the case to the Compliance Review Phase.
- 3.11 The executing agency, IDB, and the group of Requesters agreed at a plenary meeting on 23 February 2022 that an impartial body would study alternatives, to find a technical solution that addresses the problem of pollution in the Drainage Canal. The process has a work plan and estimated timetable, and the group of Requesters shared comments on the terms of reference for the executing agency's consideration.
- 3.12 Location of water quality monitoring stations. Eight of the ten sampling points identified in the Agreement were monitored in 2021. The other two, under ADA responsibility, were monitored in late 2020.
- 3.13 On 2 June 2021, UCEPO and COMIREC shared a May 2021 report from the Luján River Basin Committee (COMILU) concerning monitoring in the Luján River, and one from COMIREC that included results of monitoring on 30 March 2021 at 16 stations in the main watercourse of the Reconquista River Basin.
- 3.14 On 10 May 2022, UCEPO and COMIREC shared a December 2021 report from COMILU concerning monitoring in the Luján River, and one from COMIREC that included results of monitoring in November and December 2021 at 26 stations in the basin.
- 3.15 Effluent mapping and discharge control. On 6 July 2021, the ADA shared information through UCEPO on the 37 industries involved in the program for Management of Liquid Effluents with Industrial Strengthening (GELFI). On 13 June 2022, the ADA shared an updated list of the 25 involved industries through UCEPO and COMIREC.

The ADA also reported that 159 inspections were done on the Reconquista River in 2021, with objections raised to 51. It also reported that 80 inspections were done in the Claro stream during the same period, with objections raised to 30.

- 3.16 Environmental and social impact on the delta. In June 2022, IDB Management reported that an analysis of the cumulative impact on the delta is included in the environmental and social impact assessments for six of the seven works that were issued a no objection in the review period. The works are:
- Paving and improvement of sewers on the Las Tunas stream, Malvinas Argentinas district;
 - Barrio Vengoechea 4-bis sewer drains, General Rodríguez district;
 - Ituzaingó Reconquista River urban nature reserve, Ituzaingó district;
 - Archimedes – Villa de Mayo waterworks, Malvinas Argentinas district;
 - Granaderos stream basin and Torres stream basin – Av. Argentina storm drains, Merlo district;
 - Paso del Rey basin storm drains, Moreno district.
- 3.17 The Bank explained that there is no explicit mention of cumulative impact in the project for "Restoration of the Roggero Dam System and Sluice Gates on Buen Ayre Road," since it includes no works and does not change the operating level of the reservoir or produce changes in flow.

IV. CONCLUSIONS AND NEXT STEPS

- 4.1 In the period reviewed in this report, the MICI observed the implementation of activities intended to comply with the MICI Agreement. The activities were implemented in the complex setting of the pandemic and several structural challenges. The province's infrastructure minister changed at the end of September 2021, which in turn led to changes in the authorities of the executing agency and delays in the process. The support of the IDB and UCEPO officials was crucial in facilitating this transition.
- 4.2 In spite of the progress made on three of the four commitments reached in November 2019, implementation of the first point of the Agreement, which is at the heart the MICI Request, remains very limited and faces major challenges, despite the efforts of the Parties. According to COMIREC, the analysis of hydraulic operations at the Reconquista River – Drainage Canal fork indicates that building a level spillway with the tested heights would alter the basin's water dynamics. At the time of writing this report, the process of studying alternatives for point 1 has a work plan and estimated delivery dates for tangible technical results and will be conducted by an impartial body.
- 4.3 The PGICRR experienced contractual challenges with the independent firm in charge of its design, and the contract was terminated in 2021. This resulted in

changes to the terms of reference for completion of the plan. The Bank issued its no objection to the changes in the terms of reference via an official communication with the IDB on 13 June 2022. The master plan is expected to be back in execution with the new winner of the competitive bidding process in November 2022. In addition to the PGICRR's importance for the Request, the MICI notes that it represents an opportunity to lend continuity to the agreed commitments on water quality monitoring points, effluent mapping, and discharge control beyond the time frames established in the MICI Policy.

- 4.4 The changes of authorities at the executing agency, as well as on the IDB project team, created some delays and gaps in institutional memory of the handling of the case and represent a challenge to progress on the commitments reached in November 2019. Nonetheless, the MICI highlights the efforts and commitment of the Parties to advancing on compliance with the Agreement and adapting to the structural challenges encountered during the monitoring period. The MICI acknowledges the efforts made by the group of Requesters to participate in the MICI process and their essential role in monitoring the commitments reached under it.
- 4.5 In 2022, the MICI will continue with its monitoring activities by organizing and facilitating monitoring sessions. If the circumstances of the pandemic allow, the MICI will field at least two missions to Tigre and La Plata in the second half of the year to facilitate in-person monitoring meetings and assess progress toward compliance. The MICI will provide the Parties with ad hoc support as needed and will continue to evaluate any circumstances that could weaken the process. In May 2023, it will issue the Third Annual Monitoring Report, which will discuss the actions taken and the progress achieved.