

MEMORANDUM

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Date: June 29, 2016

To: Victoria Marquez Mees, MICI Director
From: Néstor Roa, Transport Division Chief
CC: Vice President of Countries, Vice President of Sectors and Knowledge, Office of the Executive Vice President, Country Department Southern Cone, Manager of the Infrastructure and Energy Sector, Country Representative for Paraguay, Environmental Safeguards Unit
RE: Management Response to Request
Ref: Case MICI-BID-PR-2016-0101. Paraguay: “Downtown Redevelopment, Modernization Metropolitan Public Transport, Government Offices” (PR-L1044)

I. Introduction

01. The purpose of this document is to establish the position of the Bank (Management)¹ with respect to the allegations presented by the Requesters in case MICI-BID-PR-2016-0101, the “Downtown Redevelopment, Modernization Metropolitan Public Transport, Government Offices” Project (PR-L1044) (the project), in accordance with section 21 of the Policy of the Independent Consultation and Investigation Mechanism (MI-47-3) (MICI Policy).

II. Background

02. The project was added to the Bank’s project pipeline for the year 2009 and was approved by the Bank’s Board of Executive Directors on September 29, 2010. The loan contract between the Republic of Paraguay and the Bank was signed on October 9, 2010. The respective bill was submitted by the Executive Branch to Congress for ratification in May 2011, and one year later it was rejected by the House of Representatives. It was once again introduced to Congress in July 2012, and was again voted down by the House in September of that year. It was sent to Congress a third time in early 2013, and was finally approved on December 27, 2013. Both times the bill was rejected, it was based on considerations regarding the technology for the provision of bus service, as electric power was seen as preferable to liquid fuel.
03. Simultaneously with the project’s preparation, the national authorities submitted a request to the Bank for the use of funds from the Line of Credit for Project Preparation and Execution Facility (PROPEF) (PPF-004/PR) in order to design and

¹ The document was prepared jointly by the Transport Division, Infrastructure and Energy Sector, and the Urban Development and Housing Division of the Sustainable Development Sector, in conjunction with the Legal Department, the Environmental Safeguards Unit, and the Office of the Vice President for Sectors and Knowledge.

implement the actions identified as priorities. This operation (PR-L1056, 2316/OC-PR, US\$4.9 million), approved by the Bank in April 2010, finances the execution of the urban renewal construction works, the transport system designs, and the respective environmental and social studies, including the preparation of Resettlement and Compensation Plans. The project includes two principal components: (i) Urban Revitalization (UR); and (ii) the First Metropolitan Public Transport Corridor (BRT-Metrobus). Accordingly, the operation was structured jointly by the Transport Division (INE/TSP) and the Fiscal and Municipal Management Division (IFD/FMM). The program is carried out by an executing unit that reports directly to the Ministry of Public Works and Communications (MOPC).

04. Various consultants were hired during the project preparation stage, including for the identification of the environmental and social impacts of both components. The identified risks of the project included the potential involuntary resettlement of 47 families in San Jerónimo and the relocation of affected merchants, mainly small businesses and informal vendors, due to the location of the infrastructure. Those most notably affected would include the businesses in “Mercado 4” in Asunción and the San Lorenzo Market, and the informal vendors located in the area directly affected by the BRT corridor. To properly address this situation during the environmental and social due diligence conducted by the Bank, Resettlement Plans were prepared for the UR and BRT components and were included in the Environmental and Social Management Report (ESMR) that was part of the loan proposal approved by the Bank’s Board of Executive Directors on September 29, 2010.
05. Following the approval of the project loan, as part of the support actions financed by the PROPEF, and with more detailed information about the project, the LOGIT-CIA-GSD Plus consortium conducted an Environmental and Social Impact Assessment (ESIA) that included a Resettlement and Compensation Plan based on the criteria of the Resettlement Plan previously drafted as part of the Bank’s analysis of the project. The preparation of the ESIA began in late 2010, and in May 2011 it was disclosed to the public and it was announced to the local press that public hearings would be held in the municipalities of Asunción, Fernando de la Mora, and San Lorenzo, as well as at the office of the Governor of the Central Department. On July 18, 2011, the Ministry of the Environment (SEAM) issued the environmental license for the project. Based on the feedback received, the reports and the final version of the ESIA were fine-tuned. The Consortium submitted the Resettlement and Compensation Plan to the MOPC on November 18 2011.
06. The project took effect on December 27, 2013, and was granted eligibility by the Bank on April 15, 2014. Since that time, the Bank has supported the executing unit by hiring various consultants, which has made it possible, among other things, to move forward with the activities summarized below. For further details, Annex I presents a complete timeline of all of the relevant program actions.
 - Preparation of the response and clarifications document presented by the School of Engineering of the National University of Asunción and the Spanish consulting firm TAINER, hired by the MOPC under the current government (October 2014).

- Review of the public transportation operating scheme (November 2014).
- Review of demand, alignment, and alternatives for entry into Asunción and San Lorenzo (December 2014).
- Study of Alternatives for the Implementation of Electric Buses in Asunción (February 2015).
- Updating of topographical and underground infrastructure information on sections 2 and 3. Preparation of plans for competitive bidding (March 2015).
- Preparation and review of bid documents for sections 2 and 3 (April 2015).
- Comprehensive advising of the executing unit's social team (October 2015).
- Review of agreements and renewal of agreements with the municipalities. Review of the institutional structure of the MOPC in order to identify options for the establishment of a managing entity in charge of public transportation (March 2015).
- Renewal of the environmental license for sections 2 and 3 (the project license had expired) (February 2015).
- Updating of the Resettlement and Compensation Framework and preparation of the Master Resettlement and Compensation Plan (PDRI) (June 2016).

III. Execution of the Operation

07. Since completion of the Metrobus design, the project has been subject to ongoing disclosure and consultation activities. These activities were intensified in 2015 and 2016 once the project was ratified, and included house-to-house interviews, public hearings, and specific meetings with different stakeholders. More than 20 consultation meetings have been held to date throughout the corridor to be awarded (see Annex II).
08. With the results from the previously identified consultancy services (¶06), the Government of Paraguay decided to divide the Metrobus works into four sections to be executed in two stages (Annex III presents the corridor plan identifying the four sections). The initial stage is for the construction of sections 2 and 3, approximately 11 km long, and the second stage is for sections 1 and 4 of the corridor. The prequalification process for the construction of the works for stage one began on March 27, 2015, the list of companies was compiled and invited to submit proposals on September 30, 2015, and the bids were opened on December 16, 2015. The project was awarded to the Portuguese firm Mota Engil Ingeniería & Construcciones S.A. in late March 2016, through a contract for the update of the final design and construction.
09. Sections 1 and 4, which include “Mercado 4” in Asunción and the San Lorenzo Market, are not part of the bid that was awarded. The competitive bidding process for the engineering design of those sections is currently being initiated, and the construction works are not expected to begin until early 2018.
10. With the results of the aforementioned consultancy studies and with the objective of providing guidelines and criteria for drafting and implementing the specific

resettlement plans for each section/phase of the project, their update was finalized on June 10, 2016. A PDRI was defined for the two components of the project, which was originally developed within the scope of the design consultancy work with the LOGIT, CIA, GSD+ consortium (Volume 6 of the study). The PDRI takes account of the guidelines established in the Policy on Involuntary Resettlement (OP-710) and national regulations.

11. It bears mentioning that the development of the BRT will affect two houses, but these effects do not require the displacement of their residents; rather, they will require compensation for damages that do not prevent them from continuing to be used as residences. In addition, the effects of the BRT in the area will not, for the most part, prevent the development of business activities in either the construction phase or the operational phase of the project. The PDRI identifies actions to minimize and/or offset the socioeconomic effects on the individuals located at the sites where the construction works and publicly owned strip of land will be developed, including property owners, small business owners, informal vendors, and others.
12. The principal actions included in the PDRI include: (i) optimal management of progress on construction fronts; (ii) traffic diversion plan; (iii) monetary compensation for the loss of land and/or improvements; (iv) alternative parking plan; (v) relocation of fixed vendor stalls located in public areas; (vi) support for technical training and professionalization; (vii) support for business development; (viii) Labor Retraining Plan for Drivers and Transportation Service Suppliers; and (ix) Worksites Communication Plan.

IV. Examination of the Request

13. Section F.14 of the MICI Policy establishes the content and format of a request, and section G.22 states the criteria for a request to be declared eligible. In view of these sections, Management summarizes the following considerations with respect to the request filed:

- a. A clear explanation of the alleged harm and its relation to the noncompliance of the Relevant Operational Policy (sections 14.f and 22.c).

Having examined the formal case request and supplemental testimonial videos, it is not clear to Management that there is a relationship between the description of the alleged harm and noncompliance with the Bank's Relevant Operational Policies. Specifically, the requirements contained in paragraphs 14.f of section F and 22.c of section G of the MICI Policy are as follows: (i) Paragraph 14.f requires "A clear explanation of the alleged harm and its relation to the noncompliance of the Relevant Operational Policy in a Bank-Financed Operation, if known"; and (ii) Paragraph 22.c considers the case eligible if "The Request describes the harm that could result from potential noncompliance with one or more Relevant Operational Policies."

- b. A description of the efforts made by or on behalf of the Requesters to address the issues in the Request with Management, and the results of those efforts; (Sections 14.g and 22.d).

The Request states that on April 14, 2016, the property owners affected by the Metrobus project presented a note to the Bank’s office in Asunción addressed to Eduardo Almeida, the Bank’s Representative in Paraguay, to which they have not received an answer. However, the note was in fact answered.

On the aforementioned date, the Bank did indeed receive a note from attorney Guillermo González on behalf of the Association of Property Owners, Merchants, Workers, and Users of Eusebio Ayala and Mariscal Estigarribia Avenues.

Management additionally notes that on April 19, 2016, the Bank’s Country Office in Paraguay did in fact respond to the April 14, 2016 note, inviting attorney Guillermo González to contact the Program’s Coordinating Unit and expressing the Bank’s intent to cooperate and support the dialogue, in clear evidence of its willingness to address the issues raised. To date, Management has not received any communication suggesting a place or requesting the joint meeting.

We further observe that the aforementioned note was presented to Management not by the Requesters but rather by an attorney, supposedly on behalf of an interested entity—the Association of Property Owners, Merchants, Workers, and Users of Eusebio Ayala and Mariscal Estigarribia Avenues (APCTU)—which is inconsistent with the identity of the Requesters in this case.

V. Management’s Comments on the Requesters’ Allegations

- A. Efforts made by the Requesters to address the issues with Management.
 - 14. Attorney Guillermo González sent a written communication on behalf of the APCTU of the Eusebio Ayala to the Bank’s Representative on April 14, 2016, presenting a list of alleged violations of the loan contract and national law, and requesting that the Bank intervene to remedy the situation. The letter also requested a meeting. The Bank replied to attorney Guillermo González on April 19, 2016, inviting him to contact the Project’s Executing Unit, and offering to hold a joint meeting with the MOPC. Subsequent to Management’s reply, there has been no communication suggesting a place or requesting the joint meeting.
 - 15. Later, on April 20, 2016, the Bank’s Country Office in Paraguay received a communication signed by more than 300 companies located along the corridor asking for the government to take actions, such as replacing the BRT’s technical coordinator, and expressing their disagreement with the project, among other points. Because there was no representative or address to which to reply, Management informed the MOPC of the matter but did not send a reply.
- B. Request MICI-BID-PR-2016-0101. Responses to the allegations.
 - 16. On May 17, 2016, the MICI received a Request signed by a group of individuals who reside, as evidenced in the request, in the municipality of Fernando de la Mora (section 3), with the exception of [REDACTED], the owner of a business in downtown Asunción (section 1). Presented below are the allegations included in the Request, each one of which is followed by an answer:

Allegations	Remarks
“The Bank has failed to	Management has not found in the Request the relationship between the

Allegations	Remarks
properly apply various Relevant Operational Policies.”	description of the alleged harm that this situation may have caused to the claimants in accordance with the provisions of the MICI Policy (Paragraphs 14.f of section F and 22.c of section G).
“The Bank has failed to apply [...] [Section]5.133 of the IDB loan contract Law establishes that prior to announcing the call for bids the parties affected by the metrobus project must have full relocation; it expressly states: Clause 3.03 SPECIAL CONDITIONS OF EXECUTION (f) Prior to announcing the call for bids for works related to the BRT Component, agreements must have been made between the Executing Agency and the Municipalities of Asunción, Fernando de la Mora, and San Lorenzo to render that component ‘viable in its entirety””	The Bank has observed the provisions of the Loan Contract. Specifically, in compliance with special execution condition 3.03 (f), the MOPC signed the pertinent agreements with the three municipalities in which the project will be developed, as follows: -Municipality of Asunción: Original agreement: June 23, 2009, valid for three years. Extension of the agreement: December 16, 2009, valid until the end of the project. -Municipality of San Lorenzo: Original agreement: November 10, 2010, valid for five years. Extension of the agreement: June 1, 2016, valid until the end of the project. -Municipality of Fernando de la Mora: Original agreement: November 16, 2010, valid for five years. Extension of the agreement: April 6, 2016, valid until the end of the project. <u>The three agreements were valid at the time of the prequalification and call for bids for the first section of worksites of the BRT component, in compliance with clause 3.03(f) of the Special Stipulations of the Loan Contract.</u>
“...and specifically make reference to the active participation of those parties in the design, implementation, and support of the communication,	The three agreements refer specifically to the active participation of the municipalities in the Metrobus communication plans. The program has been subject to ongoing disclosure and consultation activities. These activities were intensified in 2015 and 2016 once the project was ratified, and included house-to-house interviews, public hearings, and specific meetings with different stakeholders. More than 20 consultation meetings have been held to date throughout the corridor to be awarded. For the disclosure and consultation actions, teams have been set up to participate in different meetings in order to address any concerns the public may have, present information about the project, and raise issues that should be clarified in the future. The consultations were reinitiated in 2015, and more than 20 consultation meetings have been held to date throughout the corridor to be awarded. The details of those meetings are presented in Annex II.
“...relocation, resettlement, and economic redevelopment plans for the different parties affected, to ensure the financial, environmental, and social operation and sustainability of the works.”	The three agreements refer specifically to the relocation, resettlement, and economic transitioning of the different parties affected in a way that ensures the operation and sustainability of the worksites in financial, environmental, and social terms. The MOPC has spearheaded the design, preparation, and finalization of several plans and programs that aim to mitigate the impacts of resettlement and land use conversion, including: (i) optimal management of progress on construction fronts; (ii) traffic diversion plan; (iii) monetary compensation for the loss of land and/or improvements; (iv) alternative parking plan; (v) relocation of fixed vendor stalls located in public areas; (vi) support for technical training and professionalization; (vii) support for business development; (viii) Labor Retraining Plan for Drivers and Transportation Service Suppliers; and (ix) Worksites Communication Plan.
“Absolutely nothing of what is established in the loan contract exists...”	This is not correct. The Bank’s project team complies with its fiduciary mandate; the executing body also complies with the provisions of the Loan Contract. That contract and the associated agreements are currently in force and support the implementation of plans and programs for

Allegations	Remarks
	purposes of properly executing the project.
“...the work supposedly begins next month...”	The work on sections 2 and 3 is expected to begin in August 2016.
“...the work was already awarded, and was subcontracted to another company without the Bank’s authorization.”	The bid documents, to which the Bank has given its No Objection, included a clause expressly authorizing the contractor to select a principal subcontractor without additional authorization.
“...the note dated April 14 of this year and submitted by the property owners affected by the metrobus project to the Bank’s office in Asunción, addressed to the Bank’s Representative in Paraguay, Mr. Eduardo Marques Almedia, and received by Katherine Enriquez, has not been answered, and therefore we consider that avenue to have been exhausted.”	The Bank replied to attorney Guillermo González on April 19, inviting him to communicate with the Project’s Executing Unit and offering to hold a joint meeting with the MOPC, since the MOPC is the project’s executing agency. Subsequent to this reply, there has been no communication suggesting a place or requesting the joint meeting.

VI. Conclusions

17. Based on the foregoing arguments, Management is of the opinion that the Bank has been complying, both in the preparation and in the execution of the project, with the Relevant Operational Policies and the conditions established in the Loan Contract that was signed.
18. In addition, and having examined the Request, Management finds that the Requesters have failed to establish a direct relationship between the description of the alleged harm and noncompliance with the Bank’s Relevant Operational Policies, as required under the MICI Policy. Moreover, it bears noting that Management replied in a timely manner, expressly stating its willingness to address the issues raised by the Requesters, but received no response to its communication.

Annex I. Timeline of Preparation and Execution Actions Related to the Case

YEAR	DATES		EVENT	REMARKS	SCOPE - SECTIONS			
	Start	End			1	2	3	4
2009	26-Jun		Agreement	Signature of the MOPC - Municipality of Asunción framework agreement				
	26-Oct	29-Oct	Identification Mission	Project Identification Mission				
	16-Dec		Agreement	Addendum 1 to the framework agreement between MOPC and the Municipality of Asunción including UR and BRT				
2010	11-Feb			ESG presents the social and environmental review of the project				
	19-Feb			Approval of the Project Profile by ERM at a face-to-face meeting				
	16-Apr			Bank approves the Request of the Government of Paraguay to use the PROPEF line of credit (PPF-004-PR) in the amount of US\$4,900,000 and local matching funds of US\$1,100,000				
	27-Jun	3-Jul	Orientation Mission	Orientation Mission PR-L1044				
	13-Jul			Initial execution of the PROPEF				
	30-Aug	3-Sept	Special Mission/Analysis	Special Mission/Analysis PR-L1044				
	3-Sept			Consultant submits the BRT Relocation Framework Plan				
	8-Sept		Negotiation	Loan negotiation document is signed				
	10-Sept		Resettlement Plans	Consolidated version of the Resettlement Plans is finalized				
	16-Sept		Resettlement Plan	Transport Division sends Resettlement Plan - Asunción BRT and UR Program to ESRNET				
	29-Sept		Registration of Approval	Approval of the Loan by the Board of Executive Directors				
	9-Oct		Signature	Loan Contract between the Bank and Paraguay PR-L1044				
	10-Nov	10-Nov	Agreement	Signature of MOPC - Municipality of San Lorenzo agreement				
	10-Nov	10-Nov	Agreement	Signature of MOPC - Municipality of Fernando de la Mora agreement				

YEAR	DATES		EVENT	REMARKS	SCOPE - SECTIONS			
	Start	End			1	2	3	4
	23-Nov		Signature of project design contract, EIA, and resettlement plans	Project design contract with funds from the PROPEF PR-L1056				
2011	2-Feb	24-Oct	Consultations	Informational Meetings and Public Consultations in Asunción, Fernando de la Mora, and San Lorenzo				
	1-Apr		Communication	SEAM defines terms for the EIA and the need to submit the Environmental Impact Report to the three municipalities for consideration				
	1-May		Presentation	Executive Branch introduces bill to Congress for approval of the loan contract				
	1-May	4-May	Publication of EIA	Publication of EIA in local press (ABC Color, La Nación)				
	18-Jul		Licensing	SEAM grants environmental license for the project				
		1-Nov	Social/Compensation Study	Finalization of diagnostic study of informal vendors, mitigation measures, and Resettlement Plan for the entire Asunción, Fernando de la Mora, and San Lorenzo section				
	18-Nov		Final Report	LOGIT-CIA-GSD Plus consortium submits final version of its design, environmental studies, etc.				
2012	1-May	22-Jun	Informational Meetings	Various meetings in municipalities, schools, and universities, to publicize the project and the results of the environmental and social studies				
	May		Rejection	House of Representatives rejects the bill				
	Jul		Introduction	To Senate for the second time				
	Sept		Rejection	House of Representatives rejects the bill for the second time				
4-Dec	May		Approval	Senate ratification of the loan				
	Aug		Amendment	House of Representatives amends the loan				
	Oct		Approval	Senate approval				
	4-Dec		Approval	House of Representatives approves the loan				
	23-Dec		MOPC contract	MOPC hires Spanish firm TAINER to review the project (audit)				
	27-Dec		Entry into force	Loan takes effect, enactment				
2014	15-Apr		Eligibility	Bank grants eligibility to the loan				

YEAR	DATES		EVENT	REMARKS	SCOPE - SECTIONS				
	Start	End			1	2	3	4	
	June		External Review	FIUNA (School of Engineering of the National University of Asunción) presents study with some observations regarding the project					
	July		Clarifications	LOGIT clarifies all questions					
	August	1-Dec	IDB Contracts	Juan Manuel Cano and José Tomás Rivarola (temporary contract) are hired with Bank funds					
	27-Nov		IDB Contracts	Bank hires the Mexican firm Transconsult to provide technical advice to the PEU in all aspects of the BRT project					
	December		MOPC Contract	MOPC hires Juan Manuel Cano as Manager and José Tomás Rivarola as BRT Technical Coordinator					
	December		MOPC Contract	MOPC hires LOGIT to review demand and identify alternative routes of entry to Asunción and San Lorenzo					
	2015	February		IDB Contracts	Bank hires LOGIT for alternative technology analysis				
		27-Feb	1-Jul	IDB Contracts	Bank hires consultant Teresa de Mariño to update the EIA for the section of the project to be awarded				
1-Mar		30-Mar	House-to-house visits	Visits to all of the property owners in sections 2 and 3 (to be awarded) to inform them of the project in Asunción and Fernando de la Mora					
16-Mar			Political decision	MOPC decides to divide the project into sections and proceed with the call for bids for sections 2 and 3					
23-Mar			IDB Contracts	Bank hires attorney Enrique Sosa to review agreements with municipalities and public utility companies, the organizational structure of the transport system and companies, transport service provider contracts, and other institutional issues for the operation of the system.					
24-Mar			IDB Contracts	Bank hires CIA to review and update the technical plans for the call for bids for sections 2 and 3					
20-Mar		10-Apr	Meetings and consultation visits	MOPC's Social Group conducts house-to-house visits to affected persons throughout the corridor to be awarded					
4-Apr				The project manager is appointed Vice Minister and the project is left without a leader					

YEAR	DATES		EVENT	REMARKS	SCOPE - SECTIONS			
	Start	End			1	2	3	4
	10-Apr		IDB Contract	Bank hires consultant Alcides Moreno to support the executing unit in the preparation of the bid documents for sections 2 and 3				
	20-May	4-Aug	Public Hearings	Public Hearings in Asunción and San Lorenzo (attended by vendors from Mercado 4 and the San Lorenzo Market)				
	30-Jun		IDB Contracts	Bank hires Ángel Recalde as project manager				
	15-Apr	1-Jul	Prequalification	MOPC initiates prequalification and puts out call for bids for sections 2 and 3				
	26-Aug		Licensing	SEAM grants the environmental license for sections 2 and 3 of the project				
	26-Oct		IDB Contracts	Bank hires Helena Correa to support social management				
	5-Oct	26-Nov	Meetings with property owners' groups	Meetings by sectors throughout the corridor (2 and 3)				
	2016	15-Jan			Project manager is named director of Yacyretá, once again leaving the project without a leader			
15-Feb			IDB Contracts	Bank hires current project manager (temporary) Santiago De Filippis				
16-Feb		18-Feb	Meetings with informal vendors and participatory workshops	Meetings with merchants who have fixed sidewalk stalls and participatory workshops				
8-Mar		31-Mar	Meetings with property owners' groups	Meetings by sectors throughout the corridor (2 and 3)				
6-Apr			Agreement with municipality	Renewal of agreement with Fernando de la Mora				
8-Apr			IDB Contracts	Bank hires Caren Kremer to develop the Master Resettlement and Compensation Plan (PDRI) governing appropriate compensation				
11-Apr		9-May	Meetings with specific groups	Meetings with municipal councils, House of Representatives, and others				
25-Apr			IDB Contracts	Bank hires Caren Kremer to support review and update of the Involuntary Resettlement Plan and preparation of the PDRI				

YEAR	DATES		EVENT	REMARKS	SCOPE - SECTIONS			
	Start	End			1	2	3	4
	1-May	1-Jul	MOPC contract	MOPC hires GEAM – Social Management Plan for Informal Vendors				
	1-May		IDB Contracts	BID hires CAPYME to design the compensation plan for businesses along the corridor				
	1-Jun		Agreement with municipality	Renewal of agreement with San Lorenzo				
	10-Jun		MOPC contract	MOPC hires IVICSA for the Updated Environmental Management Plan				
	13-Jun		Resettlement Plan	Conclusion of the PDRI				

	Approval procedures
	Public consultations on environmental and social issues
	Loan conditions
	IDB Support Contracts
	Activities related to the Resettlement Plan

Annex II. Summary of Meetings and Public Consultations Held Since 2011

Summary of Meetings and Public Consultations						
EVENT / YEAR	MUNI	2011	2012	2015	2016	TOTAL
Informational meetings	AS		16			28
	FM		1			
	SL	3	7			
	CD				1	
Public consultations	AS	1		1	1	7
	FM	1				
	SL	1		1	1	
House-to-house visits (# informed)	AS			578		962
	FM			284		
	SL			100		
Public hearings	AS			7		18
	FM			3	3	
	SL			1	4	
Meetings with informal merchants with fixed vendor stalls	AS				1	3
	FM				1	
	SL				1	
Participatory workshops	AS				1	3
	SL				2	

Key	
Asunción	AS
Fernando de la Mora	FM
San Lorenzo	SL
House of Representatives	CD

Annex III. BRT Corridor Plan - Identification of Sections

