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AND INVESTIGATION MECHANISM

**MICI-BID-PR-2016-0101
ELIGIBILITY DETERMINATION MEMORANDUM**

**DOWNTOWN REDEVELOPMENT, MODERNIZATION METROPOLITAN PUBLIC TRANSPORT
GOVERNMENT OFFICES**

**(PR-L1044)
(2419/OC-PR)**

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ELECTRONIC LINKS

1. Original Request <http://www.iadb.org/document.cfm?id=40316044>
2. Testimonial video #1 <http://www.iadb.org/document.cfm?id=40316013>
3. Testimonial video #2 <http://www.iadb.org/document.cfm?id=40316110>
4. Testimonial video #3 <http://www.iadb.org/document.cfm?id=40316111>
5. Testimonial video #4 <http://www.iadb.org/document.cfm?id=40316112>
6. Testimonial video #5 <http://www.iadb.org/document.cfm?id=40316114>
7. Testimonial video #6 <http://www.iadb.org/document.cfm?id=40316117>
8. Testimonial video #7 <http://www.iadb.org/document.cfm?id=40316121>
9. Testimonial video #8 <http://www.iadb.org/document.cfm?id=40316123>
10. Testimonial video #9 <http://www.iadb.org/document.cfm?id=40316124>
11. Summary of Testimonies provided by the Requesters
<http://www.iadb.org/document.cfm?id=40317033>
12. Management's Response <http://www.iadb.org/es/mici/detalle-de-la-request,19172.html>
13. Project Profile, "DOWNTOWN REDEVELOPMENT, MODERNIZATION OF METROPOLITAN PUBLIC TRANSPORT, AND GOVERNMENT OFFICES"
<http://www.iadb.org/Document.cfm?id=35109799>
14. Loan Proposal, "DOWNTOWN REDEVELOPMENT, MODERNIZATION OF METROPOLITAN PUBLIC TRANSPORT, AND GOVERNMENT OFFICES"
<http://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=35382314>
15. Preliminary Environmental Impact Assessment (pEIA) Section II: Avda. Eusebio Ayala and Gral. Aquino (Asunción) – Ruta Mariscal Estigarribia (Campus of the National University of Asunción, San Lorenzo) July 2015 <http://www.iadb.org/Document.cfm?id=40342552>
16. Letter of Agreement Part I – Individual Operation - PROPEF, "DOWNTOWN REDEVELOPMENT, MODERNIZATION OF METROPOLITAN PUBLIC TRANSPORT, AND GOVERNMENT OFFICES." <http://www.iadb.org/Document.cfm?id=35086853>
17. Letter of Agreement Part II– Individual Operation - PROPEF, "DOWNTOWN REDEVELOPMENT, MODERNIZATION OF METROPOLITAN PUBLIC TRANSPORT, AND GOVERNMENT OFFICES." <http://www.iadb.org/Document.cfm?id=35086856>
18. Letter of Agreement Part III – Individual Operation - PROPEF, "DOWNTOWN REDEVELOPMENT, MODERNIZATION OF METROPOLITAN PUBLIC TRANSPORT, AND GOVERNMENT OFFICES." <http://www.iadb.org/Document.cfm?id=35086855>
19. Support for the Preparation of Project Studies PR-L1084 and PR-L1044
<http://www.iadb.org/Document.cfm?id=39165951>

EXECUTIVE SUMMARY

On May 17, 2016, a group of 11 formal and informal merchants from the city of Asunción, Paraguay filed a Request with the Independent Consultation and Investigation Mechanism (MICI), accompanied by a total of 9 testimonial videos, which was registered in the Public Registry as [MICI-BID-PR-2016-0101](#).

In the Request, the Requesters allege that the “First Metropolitan Public Transportation Corridor” component of the “Downtown Redevelopment, Modernization of Metropolitan Public Transport, and Government Offices” project (PR-L1044) could cause economic harm to them at both the execution and operation stages, with negative impacts on their household incomes. Also, they informed of the contact they had with Bank Management on April 14, 2016, and that they claimed for their Request to be processed at both of the MICI's Phases (Consultation and Compliance Review Phases).

The “Downtown Redevelopment, Modernization of Metropolitan Public Transport, and Government Offices” project (PR-L1044) includes a component that provides for the design, structuring, and implementation of an integrated Metrobus public passenger transportation system, which is the subject of the Requesters' complaint. The project is a sovereign-guaranteed loan operation approved by the Bank's Board of Executive Directors on September 29, 2010 in which the borrower is the Republic of Paraguay and the executing agency is the Ministry of Public Works and Communications (MOPC).

The Director of the MICI, as per section G of the MICI Policy (MI-47-3), and having analyzed the pertinent documentation, concludes that this Request MICI-BID-PR-2016-0101 meets the eligibility requirements set forth in the Policy.

The eligibility of the Request is not an assessment of its merits, nor a determination of the Bank's compliance or noncompliance with its Relevant Operational Policies; and in no case it leads the suspension of the project or the disbursements made by the Bank.

Notice of this decision is provided directly to the Requesters, Management, and the Executive Board of Directors by means of this Memorandum, and to interested third parties through the Public Registry. Following this notification, processing will be initiated at the Consultation Phase.

I. THE PROJECT¹

- 1.1 The “Downtown Redevelopment, Modernization of Metropolitan Public Transport, and Government Offices” project (PR-L1044) is a US \$125 million sovereign guaranteed operation, approved by the Bank’s Board of Executive Directors on September 29, 2010. The borrower is the Republic of Paraguay. The executing agency is the Ministry of Public Works and Communications (MOPC).
- 1.2 The program seeks to improve the quality of life of the population in the intervention area through the rehabilitation and upgrading of urban and transportation infrastructure. The principal objectives of the operation are: i) revitalizing downtown Asunción by improving the urban infrastructure in Barrio San Jerónimo, renewing and establishing open spaces for public use, establishing pedestrian walkways and bicycle paths, building government offices and citizen service centers, and restoring historic buildings; and ii) gradually establishing an integrated and efficient transport system for the orderly, rapid, and mass transport of the population between downtown San Lorenzo and downtown Asunción.
- 1.3 Component 2 of the project, the **“First Metropolitan Public Transportation Corridor” (US \$115.9 million)**, will finance the design, structuring, and implementation of an integrated public passenger transport system, giving priority to high-capacity bus transit in dedicated lanes (Bus Rapid Transit, BRT). The first stage will be built in the San Lorenzo–downtown Asunción corridor, along Avenida Eusebio Ayala, the main route which carries the largest volume of passengers.
- 1.4 In accordance with Paraguayan law, the project was submitted by the Executive Branch to Congress for ratification on two occasions (May 2011 and July 2012), and was rejected both times by the House of Representatives based on considerations regarding the technology to be used.² The project was finally approved by Congress on December 27, 2013, and was granted eligibility by the Bank on April 15, 2014.
- 1.5 In order to assist with the preparation of the project and conduct the necessary technical studies, on April 16, 2010 the Bank approved an operation in the amount of US \$4.9 million from the Project Preparation and Execution Facility (FAPEP) (PR-L1056); and more recently, on December 3, 2014, a non-reimbursable technical cooperation (PR-T1174) in the amount of US \$366,000 to support the preparation of studies.
- 1.6 The program has been classified as Category “B” according to the Environment and Safeguards Compliance Policy (OP-703), and based on the project documentation, the Operational Policies identified for the program are the Environment and Safeguards Compliance Policy (OP-703); the Access to Information Policy (OP-102); the Disaster Risk Management Policy (OP-704); the Operational Policy on Involuntary Resettlement (OP-710), and the Operational Policy on Indigenous Peoples (OP-765).

¹ The information in this section has been extracted from Project documents and from Management’s Response to the Request, available in the “Electronic Links” section.

² Management’s Response to the Request filed with the MICI, June 29, 2016, para. 2.

II. THE REQUEST³

- 2.1 On May 17, 2016, the MICI received a Request from a group of 11 formal and informal merchants from the city of Asunción who allege that they are being adversely affected by the installation of the Metrobus system financed by the Bank through operation PR-L1044. The merchants allege that they have never been consulted on the project, and that no alternative location or compensation has been offered for those who will need to leave the area. They also assert the lack of studies of environmental impact and the impact over the historical heritage sites.
- 2.2 With regard to the harm alleged, the Requesters argue the project will negatively affect their livelihoods in two aspects: first, they believe that sales will drop during the project's execution due to a lack of access, which will in turn lead to reduced revenue, personnel cuts, and the ensuing impact on household incomes; second, those who have been informed they have to leave the area and relocate somewhere else have not been offered any relocation plans or compensation.
- 2.3 The Requesters state that they notified Bank Management on April 14, 2016 in a communication addressed to the Bank's Representative in Paraguay, and that as of the filing date of their Request they have not received a reply.
- 2.4 They also state in their Request that are interested in MICI processing the case to the Consultation and Compliance Review Phases.
- 2.5 In addition to the information contained in the Request, MICI gathered information directly during its mission to Asunción, Paraguay from July 11 to 13, 2016. During that mission, the MICI team held meetings with each one of the Requesters in order to clarify their allegations and supplement the initial information presented. Table 1 below summarizes the allegations and concerns expressed by some of the Requesters. They are representative of the sentiments of the group of Requesters and of other groups the team encountered during the mission.

³ The Request includes 9 testimonial videos from the Requesters in which they describe the anticipated negative impacts of the Project. It is available in the "Electronic Links" section of this document.

Table 1
Summary of interviews with some Requesters during the eligibility mission

<p>Dr. Benicio Ayala Ortellado, Owner of an optician's clinic and store</p> <p>Dr. Benicio Ayala has operated the business for 30 years and currently employs 6 people.</p> <p>He has attended public hearings but has not received information about the mitigating actions to mitigate the financial harm he anticipates. His main concern is the loss of parking, since his patients—most of whom are elderly—would have trouble accessing the clinic during both the construction phase and the operation of the Metrobus.</p>
<p>Norma García, Owner of Electricidad Continental, S.A.</p> <p>Ms. García has run the business for more than 20 years. She is the head of her household and supports two minor children as well as her mother.</p> <p>She stated that the first meeting about the Metrobus was last November [2015], but that the information provided there was insufficient: "There was no information about where the project would be and what it would be like. They just showed a photograph of the bus but not of the sections." She indicated that they were visited one week prior to the MICI's mission, at which time they were given a leaflet or brochure and made to sign a sheet verifying that they had been visited. At the beginning of 2016, after knowing the project, she was forced to lay off 2 of her 5 employees and to reduce inventory in anticipation of the beginning of the construction period, during which she expects sales to drop.</p> <p>One of her main concerns is that she is going to lose her parking area; however, she does not know "how many meters, or when—they haven't told me anything, it is not clear what they are going to take, and there are no alternatives." She noted that "every time they start construction projects here in Asunción you never know when they are going to end."</p>
<p>Mr. Edgar Javier Gill and Mrs. Gladys Mancuello de Gill, Owners of the El Bar Restaurant</p> <p>The Gills, a married couple, have operated the restaurant for 20 years. It is their only source of income, and they employ several people. They have 5 children who are in school.</p> <p>They confirm that they took part in the Nov-Oct [2015] informational meetings "to find out about the project rather than to engage in consultation." They recalled that during these meetings they were told, "If things go badly for you, move."</p> <p>They are concerned about diminished sales due to the construction project and the lack of parking. They also questioned how employees will get around and how much fares will cost during the construction phase: "It will be a mess with the construction, with employees spending 2-3 fare tickets, and no guarantee of when it will end." "We live day to day—not to the same extreme as those from Mercado 4—but if they close the streets on us there is no way to enter. A day you don't work is a day you don't eat..." The worst of it all, they say, is "If I am left without work, my children's lives will be frustrated."</p> <p>They reported that a census with leaflets only began on Monday, July 11, [2016], "a very inopportune time" in their opinion, since "the MOPC says that the construction work will begin at the end of the month, and they just now informed the business owners."</p> <p>Another issue has to do with the registry of real property. Gladys asserted that the government "calls you and asks for your property deed in order to get a commitment that you will accept the expropriations. They tell you that they are going to take it from you but they don't say how much they are going to pay you." She stated that the Ministry just issued a form to expropriate but that there is no document with the municipalities, which have to give their consent.</p>

José Cirilo Rivas, Owner of the Rivas Brothers Glass Company

José is the owner of the Rivas Brothers Glass Company and has 8 employees who depend directly on the business.

He stated that his main problem is parking: "I sell window glass, and there is no other way to transport it than by parking in front of my business and mounting the glass... if they take that from me, I can't transport anything... you can't just carry a sheet of glass on the Metrobus." He stressed the fact that customers need to be able to be out front so "we can sell to them." He also stated that this problem affects his suppliers in the same way.

In his particular case, the passing lane takes up all or most of his parking.

Aida Liz Maciel, Permit holder at Mercado 4, where she has a clothing stall

Aida Liz Maciel has been the owner of a clothing business/stall in Mercado 4 for the past 17 years, and works there 6 days a week. She is a single mother of 4 children.

Her main concern is the potential displacement of her business by the construction works, since "given the size of the bus, they are going to have to move all of us... and in this place, a day you take off work is a day you don't get any money." Another concern of hers revolves around the transportation of personnel and merchandise during and after the construction work. She stated that it is very likely that with the Metrobus construction project she will be forced to spend more on fares to be able to get to work.

Regarding the information received, she stated that a large part of what she knows about the project is from what she reads in the paper or sees on television. She said that in the two years since the project began, "no one has come to talk to us or show us anything."

She commented on the building that was "promised" to them for relocation in 2013, reporting that it has been impossible to use thus far because of its poor condition. She asserts that the abandonment of the project for relocation to the building has created "serious mistrust" in other government projects.

She specified that she, like several of her companions, are not looking to receive money in exchange for vacating their current spaces; rather, they want to be given options to continue working, as they are their families' breadwinners.

Feliciano Almeida, flower vendor, Mercado 4

Feliciano and his wife have had a flower business/stall in Mercado 4 for 25 years.

He commented on his serious mistrust of government projects, saying that "they have always lied to us, they don't keep their word to us at all." From his point of view, "this project never considered the social part."

Like Aída, he stated that he was not interested in any compensation, but rather in having a place to work, since currently "the Market is saturated." He similarly shared his concern over the new building, as it lacks the most basic safety and services for its use.

He expressed his distress over not knowing how the final project is being envisaged. He remarked that the meeting he attended was merely informational, since "they did not let us ask anything, they did not answer our questions about what the project is going to be like, about the toll charges per trip...nothing."

- 2.6 The Requesters are divided into three groups, based on the harm alleged and the geographic location of the businesses:
- Formal merchants called “*frentistas*,” whose businesses are located on Ruta Mariscal Estigarribia.
 - Requesters located in the downtown area of the city of Asunción.
 - Formal and informal merchants located in Mercado 4 and on the sidewalks surrounding that market.
- 2.7 For the business owners located on **Ruta Mariscal Estigarribia** (6 Requesters), which is the area where the Metrobus construction work is anticipated to begin, the main concerns revolve around the loss of income during the construction phase because of the street closures and construction work, and during the operational phase due to the elimination of parking. They allege that even though they have received information about the benefits of the project, they have not received information on the negative impacts and mitigation measures, in spite of the fact that—according to the information received—construction is set to begin imminently.
- 2.8 The group of **Requesters from the downtown area of Asunción** (2 Requesters) includes one property owner who believes that his property value will go down due to the lack of access caused by the Metrobus construction. The other Requester in this group is the owner of “Casa Paraná,” which, according to information received from the Requester, employs some 300 individuals. Her business is on the route planned for Section 1 of the Metrobus. She has two main concerns: 1) the expansion of the very narrow street on which Casa Paraná is located, which she fears could take away part of her business (the street is only 9 meters wide), and 2) the loss of her three parking spaces that are also located where the Metrobus passes through at the narrowest point; in her opinion, “no other vehicles will be able to get through” to access those spaces. She also states that the building in which Casa Paraná is located is classified as historic, and therefore subject to the respective legal protections.
- 2.9 In terms of information about impacts and mitigation measures, the Requester states that she has taken part in the public hearings and that no answer was given at those meetings with respect to the potential adverse effects on merchants in the area. She also went to the Municipality of Asunción where she was told that they did not have any information on the project either, and that all such matters had to be taken up with the MOPC directly.
- 2.10 Finally, with regard to the **formal and informal merchants of Mercado 4** (3 Requesters) share the concerns of a much larger group of merchants from that market that they will be removed, since most of them operate their businesses on the sidewalks of calle Silvio Pettirossi. To date, they have received no information with respect to compensation and/or relocation. They have heard that the construction work will start soon, and a few days prior to the MICI’s mission they were called to an initial informational meeting.

2.11 To a lesser degree than the business owners known as “*frentistas*,” they also cited the negative impacts of the lack of customer parking on their business.

III. MANAGEMENT'S RESPONSE⁴

- 3.1 In accordance to paragraph 21 of the MICI Policy, Bank Management was notified on May 26, 2016 of the registration of Request MICI-BID-PR-2016-0101, and the submission of the documentation related to the Request was finalized on June 1, 2016. Within the period of 21 business days established in the Policy, the MICI received Management's response on June 29, 2016, which included Management's perspective on the issues raised in the Request. A brief summary of the Response is presented below, and it can also be accessed through the "Electronic Links" section of this memorandum.
- 3.2 Management states that "The Government of Paraguay decided to divide the Metrobus works into four sections to be executed in two stages. 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."⁵
- 3.3 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 construction work is not expected to begin until early 2018.
- 3.4 Management also underscores that since the eligibility date, April 2014, the Bank has supported the executing agency with a number of consultancies and studies, including the June 10, 2016 Master Resettlement and Compensation Plan, which is intended to serve as a guide for the specific involuntary resettlement plans of each section. They state that the adverse effects in the area of influence of the BRT will not, by and large, prevent the development of commercial activities in both the construction and operation phases of the project. The PDRI identifies actions to minimize and/or mitigate 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, the small business owners known as *frentistas*, informal vendors, and others.
- 3.5 With regard to the Request, it is Management's opinion that the Requesters have failed to establish a clear relationship between the alleged harm and noncompliance with the Bank's Operational Policies.

⁴ Management's Response is available in the "Electronic Links" section.

⁵ Management's Response, para. 8

- 3.6 With regard to certain specific allegations, Management notes that work on sections 2 and 3 is slated to begin in August 2016, and that the executing agency has conducted ongoing disclosure and consultation actions that have been intensified since 2015 with the formation of teams “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.”⁶
- 3.7 Finally, Management states that it received a communication on April 14, 2016 from an attorney on behalf of the “*frentista*” merchants, to which it replied by offering to hold a joint meeting with the MOPC; it did not receive a response. Management also states that it received a communication on April 20, 2016, signed by more than 300 businesses located along the corridor, expressing their dissatisfaction with the project and other points. No reply was issued, as the communication failed to specify a representative or return address.

IV. MICI ACTIONS

- 4.1 Pursuant to section G of the Policy of the MICI and in accordance with the eligibility criteria set forth in paragraph 22, the eligibility determination process followed the timeline outlined below:

Table 2
Timeline of MICI Actions

Date	Actions
May 17, 2016	Receipt of Request
May 25, 2015	Notice of Registration
June 29, 2016	Management’s Response
July 11 - 13, 2016	Mission to the city of Asunción, Paraguay
July 26, 2016	Issuance of Eligibility Determination Memorandum

- 4.2 As part of the eligibility determination process, the MICI considered the information presented in the Request, the supplemental information submitted by the Requesters, and the information received during the mission to Asunción, as well as Management’s Response and the Bank documents pertinent to this analysis.⁷
- 4.3 In this process, the MICI found particular relevance in the information received during the mission to Asunción, where it held meetings with the Bank’s project team, the members of the team responsible for the project at the executing agency, ministerial authorities, the Requesters, and other persons affected by the project.
- 4.4 The project’s social and environmental framework was carefully reviewed during the meetings with the executing agency, and valuable information was received about the planning of the construction work and the communications plan, which made it possible

⁶ Management’s Response, para.16.

⁷ The public documents examined are available in the “Electronic Links” section of this document.

to learn firsthand about the scale of the project and its importance for the Asunción metropolitan area.

- 4.5 In addition, in meetings with Requesters and other groups, valid concerns were found to exist with respect to the negative impacts that the project will have on each one of the activities of the residents of the direct area of influence, at both the construction stage and during the operation of the Metrobus. All of them acknowledged having received information about the benefits of the project, and also were united in expressing that the information available had not addressed their concerns with regard to the socioeconomic impacts and the respective mitigating actions.
- 4.6 The MICI also conducted a detailed review of the printed materials distributed, the testimonial videos of public hearings, and the websites of the Bank and the executing agency in order to determine what content was being disclosed. No information about impacts and mitigating measures was found in the materials reviewed.

V. DETERMINATION OF ELIGIBILITY

- 5.1 Under paragraph 22 of the Policy, a Request will be deemed eligible by the MICI if it is found to meet all of the following criteria:
- a) The Request is filed by two or more persons who believe that they have been or may be affected and who reside in the country where the Bank-financed Operation is implemented. If the Request is filed by a representative, the identity of the Requesters on whose behalf the Request is filed will be indicated and written proof of representation will be attached.
 - b) The Request clearly identifies a Bank-financed Operation that has been approved by the Board, the President, or the Donors Committee.
 - c) The Request describes the harm that could result from potential noncompliance with one or more Relevant Operational Policies.
 - d) The Request describes the efforts that the Requesters have made to address the issues in the Request with Management and includes a description of the results of those efforts, or an explanation of why contacting Management was not possible.
 - e) None of the exclusions set forth in paragraph 19 of the MICI Policy apply.
- 5.2 Request MICI-BID-PR-2016-0101:
- a) Was filed by 11 Requesters who are formal and informal merchants whose businesses are located on certain sections of the Metrobus route. Six of them are located on sections 2 and 3, where the construction work will begin; five are located on section 1—three in Mercado 4, and two more in the downtown area.

- b) identifies the operation “Downtown Redevelopment, Modernization of Metropolitan Public Transport, and Government Offices” (PR-L1044), which was approved by the Bank’s Board of Executive Directors on September 29, 2010.
- c) describes the economic harm that the Requesters, including female heads of households, anticipate as a result of the construction and installation of the Metrobus, one of the components of operation PR-L1044. The business owners known as “*frentistas*” cite the economic harm resulting initially from the limited access that the construction may cause during the building phase, and later from the urban changes brought about by the implementation of the Metrobus system, the elimination of parking spaces, and the reduction in vehicular traffic in the area. In addition, the Request describes the economic harm feared by those vendors located on the sidewalks of the Mercado 4 area in view of their potential involuntary resettlement and the increased transportation costs they believe they cannot afford.

The MICI Policy does not require the Requesters to establish the connection between the project and the Relevant Operational Policies. Upon its analysis, the MICI finds that the harm alleged could be related to a potential omission and/or failure to observe the policies on Involuntary Resettlement (OP-710) and Gender Equality in Development (OP-761). In this regard, it is important to stress that the purpose of the eligibility process is not to determine whether the Bank complied with its Relevant Operational Policies.

- d) describes the efforts the Requesters made to contact Management and reports that they did not receive a reply within a reasonable period of time.
- e) None of the exclusions provided for in paragraph 19 apply.

5.3 Upon conducting the appropriate analysis, the Director of the MICI has determined that Request MICI-BID-PR-2016-0101 **is eligible**, as it meets the eligibility criteria established in paragraph 22 of the MICI Policy.

VI. CONCLUSION

- 6.1 In accordance with section G of the MICI Policy (MI-47-3), the Director of the MICI concludes that this Request MICI-BID-PR-2016-0101 is **eligible**, as it meets the requisite eligibility criteria set forth in the Policy.
- 6.2 This determination of eligibility is not an assessment of the merits of the Request and the issues raised therein. Nor is it a determination of the Bank's compliance or noncompliance with its Relevant Operational Policies.
- 6.3 Finally, this decision in no way entails suspending the project or the Bank's disbursements, as the MICI does not have the authority to do so.
- 6.4 Notification of this decision is provided directly to the Requesters, Management, and the Executive Board of Directors by means of this Memorandum, and to interested third parties through the Public Registry once it has been distributed to the Executive Board of Directors.
- 6.5 Once the Executive Board of Directors has been notified, the Director of the MICI will transfer the case to the Consultation Phase in accordance with the Requesters' petition.