

MEMORANDUM

File classification: MICI-BID-AR-2019-0148

Date: 13 June 2019

To: Victoria Márquez-Mees, MICI Director

From: Sergio G. Campos, Water and Sanitation Division Chief (INE/WSA)

CC: Executive Vice President, Vice President for Countries, Vice President for Sectors and Knowledge, Infrastructure and Energy Sector Manager, Southern Cone Manager, Representative in Argentina, Environmental and Social Safeguards Unit Chief, and Chief of the Sovereign Guaranteed Operations Division of the Legal Department

Re: Management Response to the Notice of Request Registration and Request for Management Response, Request MICI-BID-AR-2019-0148 in reference to the “Reconquista River Basin Environmental Sanitation Program” (AR-L1121) – Request III.

I. Introduction

The purpose of this memorandum is to present the Response of the Management (“Management”) of the Inter-American Development Bank (“Bank”) to the “Notice of Request Registration and Request for Management Response” sent by the Bank’s Independent Consultation and Investigation Mechanism (“MICI”) to Management via email on 14 May 2019, in relation to case MICI-BID-AR-2019-0148 on the “Reconquista River Basin Environmental Sanitation Program” (AR-L1121) (“Program”).

II. Background

On 23 July 2014, the Bank’s Board of Executive Directors approved the financing of the program through a multiple-works investment loan to the Province of Buenos Aires (“Borrower”) in the amount of up to US\$ 230,000,000, with local matching funds of US\$ 57,500,000. The program’s executing agency (EA) is the Province of Buenos Aires, through the Undersecretariat for Coordination with States and International Financial Organizations of the Ministry of the Economy (“SCEOCI” or “executing agency”).

The respective Loan Contract No. 3256/OC-AR (“Loan Contract”) was signed on 10 December 2014. To date, the Bank has disbursed 22.19% of the loan proceeds.

This Program was designed as a continuation of loan 797/OC-AR (Reconquista River Sanitation), approved on 8 December 1993 for US\$150 million and co-financed with US\$75 million from the Government of Japan, with the understanding that the solution to the environmental and social problems in the Reconquista River Basin (“basin” or “CRR”) requires a sustained effort that goes beyond the scope of this operation (Agua y Saneamientos Argentinos S.A. (AySA) estimates that meeting the challenges of access to water, drinking water, and sewage services alone in the basin will cost some US\$ 2.5 billion).

The general objective of the program is to restore the basin’s environmental quality by implementing a comprehensive management plan that prioritizes leveraging actions to that end. To help achieve this objective, this operation’s strategy prioritized: (i) formulating and designing the Reconquista River Basin Comprehensive Management Plan (PGICRR); (ii) making a number of investments aimed at those living in health risk areas; (iii) addressing the priorities identified by the Province of Buenos Aires (PBA) for the basin; and (iv) complementing and expanding the actions that were not carried out with Loan 797/OC-AR, in a number of the basin’s problem areas.

To define the long-term roadmap, the formulation and design of a PGICRR was proposed as an integral part of the program, using the Shared Vision Planning (SVP) methodology, which provides for the broad participation of the basin’s stakeholders in all stages of its preparation (diagnosis, selection of alternatives, and final approval of the PGICRR). In its final form, the PGICRR will set out prioritized actions for the basin, aligned with the objective of restoring its environmental quality, adopting criteria discussed and approved by the various stakeholders, including non-governmental organizations (NGOs) and civil society, for a period of at least 15 years. It is important to note that before the PGICRR was prepared, priority was given to actions to be financed with resources from the present operation for projects prioritized by the PBA, which were part of the sample of projects. These prioritized projects would be implemented parallel to the preparation of the PGICRR and would, in addition to helping to solve specific problems for the beneficiary population, demonstrate the PBA’s commitment to environmental restoration and attention to the needs of the most disadvantaged sectors of the population. Following this approach, the program also provides support to the Reconquista River Basin Committee (“COMIREC”)¹ to consolidate its institutional structure and provide the necessary tools for the comprehensive management of the basin. In addition, there are plans to support COMIREC with a water resource information system, environmental monitoring plan, communications strategy, and training, in line with the lessons learned. The Bank’s long-term objective is to support the implementation of the entire PGICRR.

This operation thus consists of four components, the original scope of which was defined in Loan Contract No. 3256/OC-AR as follows:

Component I. Water and Sanitation. Construction and rehabilitation of water supply networks and the construction of sanitary sewer systems, including wastewater collection, transport, and treatment. The works will benefit approximately 162,000 low-income individuals (some 40,500

¹ COMIREC is a self-governing entity whose purpose is to provide services and carry out actions conducive to the comprehensive management and preservation of the water resources of the Reconquista River Basin. It has the legal capacity to plan, coordinate, execute, and control the comprehensive administration of the basin. COMIREC is governed by the legal framework of the Province of Buenos Aires: Law 12.653 and Decree 3.002/06.

households) residing in the outlying areas of the municipios of San Martín, 3 de Febrero, San Isidro, Merlo and Morón.

Component II. Solid Waste. Development of integrated urban solid waste management plans for the basin's municipios and the closing and remediation of three open air dumps. Based on these plans, the component may also finance education and public awareness raising, collection, transport, transfer, recovery, recycling, and final disposal actions and initiatives aimed at promoting integrated management of urban solid waste. The component's activities will benefit approximately 19,200 low-income individuals (some 4,800 households) living within one kilometer of the three open air dumps to be closed.

Component III. Roadways, Access, and Drainage. Road infrastructure and supplementary works, including road construction, engineering works (bridges and culverts), lighting, signage, multipurpose path, paving, repaving of intra-urban streets, and waterworks for storm drainage. The works financed by this component will benefit the population (approximately 418,000 inhabitants), reducing travel time thanks to connectivity works in isolated outlying neighborhoods located in the municipios of San Martín, Tres de Febrero, and San Isidro, benefitting approximately 12,800 households, and eliminating the risk of floods in some 4,800 dwellings in the municipios of Merlo and San Fernando.

Component IV. Environmental and Social Management. This component will finance the program's environmental and social management actions, which include: (i) 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; (ii) resettlement of approximately 750 households, of which 315 will be affected by the works of Component I and 435 live in areas susceptible to floods or other risks, in accordance with the PBA's urban redevelopment criteria; (iii) the rehabilitation and upgrade of some 400 residences partially affected by the works, thus making resettlement unnecessary in these cases; and (iv) training for municipal staff to implement the integrated urban solid waste management plans. Preparation of the PGICRR will benefit the entire population of the CRR, estimated at 3,148,013 inhabitants.

The parties agreed on certain adjustments to the activities of Component IV. These adjustments consisted of a reduction in the number of families to be affected by the planned works, as well as additional actions such as social management actions and the community equipment that are documented in the current version of the program's Operating Regulations (OR) (updated 9 October 2017), which establish the following:

Component IV. Environmental and Social Management. The objective of the component is to propose and execute the Reconquista River Basin Comprehensive Management Plan and to implement the resettlement activities associated with the program. The program's environmental and social management actions will be financed, including: 1) consulting assignment for preparing the PGICRR and industrial and urban pollution abatement actions to be given priority during the plan's preparation; 2) the implementation of water, sediment, and air quality monitoring and early warning systems; 3) the resettlement of approximately 400 families affected by the works of Component 1, living in areas susceptible to floods or other risks, in accordance with the PBA's urban redevelopment criteria; 4) the rehabilitation and upgrade of 200 homes partially affected

by the works, thus making resettlement unnecessary in these cases; 5) social management actions; 6) community equipment if possible; and 7) approximately 3,148,013 people in the CRR will benefit.

It is important to stress that the basin presents enormous socio-environmental challenges. This is affected by several factors, including accelerated and disorganized urbanization resulting in problems such as low coverage of drinking water and sanitary sewage services and poor storm drainage, as well as the presence of landfills and polluting industries upstream. These factors create a pollutant load that empties into the basin, exceeding the intake and self-purification capacity of the waterways that receive organic and inorganic discharges such as heavy metals and other pollutants such as organochlorines. As described in the above paragraphs, the different components of this operation focus on limited, one-time actions (see details in section III) that will not resolve the identified challenges at the macro level.

Based on the Bank's Environment and Safeguards Compliance Policy (OP-703), the program was classified under category A due primarily to the size of the family resettlement program identified during the preparation of the operation.

III. Program Execution

The program includes a set of projects to comprehensively address some basic infrastructure needs in the middle basin of the Reconquista River, in order to improve sanitary and environmental conditions in the region in areas that the Province of Buenos Aires considers critical, using social and sanitary risk criteria as a reference. More specifically, there are currently some 16 subprojects underway aimed at solving priority problems related to the lack of access to drinking water, sewerage, storm drainage, road connectivity, environmental education, and the oversight and rehabilitation of industries. In addition, contracting processes are moving forward for some 10 primary and secondary sewer network projects, mainly, and a storm drainage project.

For each work tendered and under construction, the respective Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), and Public Consultation Plan and/or Report was prepared.

In addition, there are a number of works at the preliminary preparation stage that are intended to resolve issues of access to sewer services, urban containment in flooded areas or natural reserves, riverbank roads, solid waste management, and the cleanup of riverbanks and waterways.

The program envisaged, from its conception, the execution of the works currently being carried out (in preparation and execution to date), selected on the basis of health and social vulnerability criteria of the basin's municipios; this would be done in parallel with the formulation and design of the PGICRR.² It should be emphasized and reiterated that this Program was originally intended to be a first phase with a limited contribution to addressing the challenges of the basin identified in section II, but is now serving to test interventions in different areas and sectors.

The PGICRR is being prepared simultaneously with the identified infrastructure works, to support the prioritization of future projects for the improvement of the middle basin of the Reconquista

² See sections 1.8, 1.9, and 3.3 of the loan proposal available on the operation's website: <https://www.iadb.org/en/project/AR-L1121>.

River. In March 2019 the contract for the preparation of the PGICRR was awarded and signed by the executing agency. The preparation of the study will take 18 months and will result in sectoral diagnoses, a hydrodynamic model of the basin, a geographic information system, a study of alternatives, the formulation of the PGICRR, an information and management system, a control panel, the participation and communication plan, and the preparation of three detailed designs for priority works. The Terms of Reference for the preparation of the PGICRR require that it be prepared under the above-described SVP methodology. As part of this methodology, workshops with the community and the basin's main stakeholders are set to be held for the preparation of the plan. The Bank expects these meetings to be held during the second half of 2019, in accordance with its Relevant Operational Policies and applicable Argentine regulations, in order to prepare a Strategic Environmental Assessment within the PGICRR.

From November 2018 to date, more than 50 meetings have been held with national and provincial bodies, municipios, universities, non-governmental organizations (NGOs), and chambers of industry, explaining the preparation process of the PGICRR and requesting the necessary information for the sectoral diagnoses that will later be included in an integrated diagnosis of the basin, the first milestone in the process. In particular, three meetings were held with municipios to present the scope of the PGICRR and the participation expected of municipal bodies in order to arrive at a consensus-based public policy plan. From the compilation of secondary information generated by this dialogue with the basin's stakeholders, the consulting firm has already delivered two reports in keeping with the delivery schedule stipulated in the terms of reference:

- An initial Perception Report, intended mainly to present the Work Plan to be executed, a methodological description of the tasks required for the formulation of the PGICRR under the SVP methodology, and an outline of the Participation and Communication Plan that will guide the development of the participatory process. COMIREC specialists analyzed the Perception Report and provided individual inputs that were integrated into a feedback report: Consolidated Report on the Perception Report.
- Progress Report 1 includes a section with comments on COMIREC's feedback regarding the Perception Report and in the second section, there is a description of Progress on Sectoral Diagnoses. The COMIREC team generated feedback from the individual inputs from each area. Considerable progress was noted between the two reports, with better adaptation to COMIREC's requirements and the identification of areas for improvement and completion for the next delivery (scheduled for mid-June).

These first two reports are part of a process whose initial consolidated output will be the production of the sectoral diagnoses, scheduled for mid-July 2019, together with the definition of the water quality, hydraulic, and GIS models.

IV. Request to MICI

On 14 May 2019, MICI sent Management the Notice of Request Registration and Request for Management Response ("Notification") related to Request MICI-BID-AR-2019-0148, which refers to the program ("Request"). The Request was filed by residents of the basin ("Requesters") who allege that they will be adversely affected by environmental harm as a result of the Bank's failure to comply with its Relevant Operational Policies within the scope of the program.

The Requesters allege that the construction works began in scattered form at various points in the basin without taking account of the basin as a territorial unit and without considering the river's capacity as a receiving body. The Requesters stated that "There is no Master Plan or

Comprehensive Management Plan; consequently, no PRIOR EIA was carried out in a timely manner.” They further allege noncompliance with citizen participation mechanisms, as well as a failure to comply with the Bank’s relevant operational policies and local laws.

V. Actions taken by Management

In order to comply with the Bank’s requirements and address concerns received from the Requesters, the following actions were taken:

- (i) Publication of the Loan Proposal. Management published the Loan Proposal on 2 July 2014 on the IDB’s external website.³ This document includes, as an electronic link, the Environmental and Social Management Report (ESMR), which was initially published on the IDB website on 7 October 2013 and updated in February 2014.⁴
- (ii) Publication of environmental and social documents (by the Bank). During the preparation of the program, different socio-environmental studies were produced and published by Management on the IDB’s external website:⁵ (i) two versions of a Master Resettlement Plan released on 27 May 2011⁶ and 15 May 2014;⁷ (ii) a comprehensive Environmental and Social Impact Assessment–ESIA (version subject to change) released on 7 May 2013;⁸ and (iii) an Environmental and Social Impact Assessment for the Riverbank Road Pilot Area released on 19 March 2018.⁹
- (iii) Updating of environmental and social documents (by the executing agency with the support of the Bank). In 2018, the original studies produced during the program’s preparation were completed in order to provide appropriate updates on the program’s overarching environmental and social issues. Specifically, the EA prepared the following with support from the Bank:
 - An updated version of the ESIA (including a Consultation Plan, Resettlement Plan, and Complaint Mechanism) for the entire program (approved by the EA in July 2018).
 - An Environmental and Social Management Framework (“Manual of Procedures for Compliance with Environmental and Social Safeguards”) for the entire program (approved by the EA in November 2018 and formally incorporated into the program through the new version of the OR).

These documents are available on the COMIREC website:
www.gba.gov.ar/comirec/saneamiento.

- (iv) Consultations. During the operation’s preparation, Management ensured that the EA carried out the following consultations: (i) In October 2010, the program was presented to several stakeholders (mayors and public works secretaries of the municipios of the basin); (ii) In May 2011, public consultation processes were carried

³ See: <http://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=EZSHARE-899088300-21>

⁴ See: <https://www.iadb.org/Document.cfm?id=38151058>

⁵ All these documents are available on the operation’s website: <https://www.iadb.org/en/project/AR-L1121>.

⁶ Available at: <https://www.iadb.org/Document.cfm?id=36201840>

⁷ The second version was released as an electronic link in the loan proposal (<https://www.iadb.org/Document.cfm?id=38797837>).

⁸ Available at: <https://www.iadb.org/Document.cfm?id=37758148>

⁹ Available at: <https://www.iadb.org/Document.cfm?id=EZSHARE-735565658-73>

out, particularly in reference to the Resettlement Plan, through two participatory neighborhood workshops in meetings with 15 environmental organizations from the basin, as well as meetings with public and private institutions and residents; (iii) In November 2011, a workshop was held in Barrio Independencia (District of San Martín) to promote citizen participation in the definition of public works to be carried out in the area; (iv) the ESIA was placed on the website of the Reconquista River Basin Committee on 10 June 2013 and three consultation meetings were held on 25 June 2013, one in each part of the basin: upper, middle, and lower.

During the program's execution, Bank Management also ensured that the EA held the following consultations: i) Consultations for the Waterworks Nexus project, 27 March 2018; ii) Water Supply Branch/Water Primary Network, 18 December 2017; iii) Sewage Collector and Impellers, 18 December 2017; iv) Secondary Sewer Network Catonas IV North and South, Lots 1 and 2, 12 April 2018, v) Storm Drain Zanjón Miguel Cané Tres Horquetas, 8 February 2018; vi) Storm Drain Zanjón Fate, 8 February 2018; vii) Riverbank Road, 18 December 2017; viii) Barrio Libertador Sewer Network, 25 July 2018; ix) Barrio Vengochea Wastewater Drainage, 21 November 2017; x) Wastewater Drainage Morón Sur Resto 1, 2, 3, 4 and sub-stage I to II, 27 March 2018; xi) Barrio Barrufaldi and Obligado Sewers, 26 April 2018; xii) José Ingenieros Canal Contention Work, 18 October 2018; xiii) El Corredor Urban Nature Reserve, 26 April 2018; xiv) San Martín Secondary Sewer Networks (Suarez Oeste, Independencia, Suarez Este 2 A, La Carcova, Suarez Oeste Resto, 8 de Mayo, and Costa Esperanza), 17 July 2018.

- (v) Response to letters, documents, concerns received, and meetings. Management maintained direct contact with the Requesters through emails sent by the IDB team leader on 16 February 2018 and 19 February 2018, and provided a formal response to letters received on a number of occasions: 9 October 2017, 11 December 2017, 9 February 2018, and 16 April 2018 (see Annex 1). Management was also active in forwarding the concerns received to the EA for the proper attention. Similarly, Management met with the Requesters in February 2017 and February 2018, showing full willingness to address the concerns raised about the operation. Finally, Management replied to a letter received by some of the Requesters in April 2018.

VI. Comments from Management

Management is of the opinion that the specific works currently being carried out are in line with the strategy designed in the program's preparation. These works will help improve the quality of life of the people living in health risk areas, mainly through the provision of basic water, sanitation, and drainage services, as well as improved road access, which once completed will contribute to the restoration of the environmental quality of the Reconquista River Basin.

Although significant environmental challenges persist in the basin, some of which are described in the Request and detailed in this document, to date no environmental harm is believed to have occurred as a result of the program's interventions. In addition, Management has taken the necessary measures pursuant to the Bank's policies to ensure the proper execution of the program as detailed in the above sections, specifically section V. It is important to emphasize that

the program's original design was to execute certain works already prioritized by the Province of Buenos Aires, to be carried out in parallel to the development of the PGICRR, which will examine the entire basin (as a unit).

As stated in section V, there have been multiple public consultations to ensure that the community has been duly consulted and that its concerns have been taken into consideration in the development of the operation (both in its preparation, including the ESIA that was released by COMIREC and the Bank, and in its execution).

Finally, information relating to two legal proceedings has also been identified. The first case was brought before the Federal Criminal Court of San Isidro I (FSM 65812/2014). The second, case number I-72832, was filed with the Supreme Court of the Province of Buenos Aires.

Management is at MICI's disposal to assist with any information or documentation on the program that is the subject of the Request registration.

Annex 1

Communication of April 2018



Buenos Aires, 16 de abril de 2018

CSC/CAR 988/2018

Señora
Adriana Córdoba
Asociación Civil COEPSA
El Tirador 901, Parque Leloir - Ituzaingó
Presente

Ref.: Programa AR-L1121 – Préstamo 3256/OC-
AR: Programa de Saneamiento Ambiental
de la Cuenca del Río Reconquista.

Estimada señora:

Acusamos recibo de su nota de fecha 5 de abril de 2018 dirigida al equipo de proyecto del BID, así como de la información enviada a nuestras colegas de Salvaguardias Ambientales y Sociales mediante mensaje de fecha 9 de abril, con relación al Programa de la referencia. Al respecto quisiéramos comentarles lo siguiente:

- Efectivamente, la cuenca del río Reconquista aún no cuenta con un Plan de Gestión Integral y su elaboración e implementación es consustancial al objetivo del Programa. Debido a que su inicio se ha visto demorado, sumado a que su elaboración requiere de un tiempo considerable, el Programa ya preveía desde su concepción, la ejecución de las obras que actualmente se están llevando a cabo. Estas obras fueron seleccionadas mediante un estudio de pre-inversión, que fue también financiado por el Banco, con fundamento en criterios de vulnerabilidad sanitaria y social de los municipios de la cuenca. Éstas y otras obras y acciones serán contempladas y evaluadas en el futuro Plan de Gestión Integral de la Cuenca del Río Reconquista (PGICRR).
- Con relación a la elaboración del PGICRR, ponemos en su conocimiento que actualmente se están revisando las propuestas técnicas de las firmas consultoras que se presentaron en el proceso de licitación pública internacional convocado para su elaboración. Los Términos de Referencia para la elaboración del PGICRR requieren que éste se elabore bajo la metodología de "Plan con Visión Compartida". Como parte de esta metodología, para la preparación del Plan se prevén talleres de trabajo con la comunidad y los actores principales de la cuenca. Se espera que estas reuniones se lleven a cabo durante la segunda mitad del año y le estaremos informando oportunamente de las mismas, en el caso de que COEPSA, ECOSUR y las demás organizaciones que usted representa quisieran participar con el fin de contribuir en el proceso de elaboración del PGICRR.

CSC/CAR 988/2018

- El equipo de proyecto del BID continúa dando seguimiento a la publicación de los Estudios de Impacto Ambiental y Social del Programa en la página web del COMIREC. Las versiones finales de dichos estudios aprobadas por el Banco se encuentran disponibles en dicha página y se pueden visualizar en: http://www.gba.gob.ar/comirec/obras_infraestructura

Sin otro particular, saludamos a usted atentamente,



Gustavo Gonnelli
Jefe de Proyecto

C.C.:

- Teresa Malalán, ecosur@fundacionecosur.org.ar;
- martindelaisla@gmail.com



Buenos Aires, 9 de febrero de 2018

CSC/CAR 418/2018

Señora
Adriana Córdoba
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El Tirador 901, Parque Leloir, tuzaiingó

Señora
Teresa Malalán
Fundación ECOSUR
Av. Directorio 141 Dto. 3 C.A.B.A

Presente

Ref.: **Préstamo 3256/OC-AR Programa de Saneamiento Ambiental de la Cuenca del Río Reconquista.**
Invitación a reunión.

De nuestra consideración:

Nos dirigimos a ustedes nuevamente en relación con nuestra nota CSC/CAR 3449/2017 de fecha 11 de diciembre de 2017, mediante la cual les informábamos que el equipo de proyecto del Banco expresaba su disposición para reunirse y que se encontraba coordinando una misión de monitoreo para inicios del 2018.

En el marco de la mencionada misión, queríamos extenderles a ustedes una invitación para reunimos en las oficinas del Banco, ubicadas en Esmeralda 130, Piso 19, CABA el día jueves 22 de febrero de 2018 a las 10hs. Les agradeceríamos si nos pudieran por favor confirmar su asistencia y la de cualquier otra persona que pudiera acompañarlas.

Sin otro particular, nos despedimos de ustedes muy atentamente.

A handwritten signature in black ink, appearing to read 'G. Gonnelli', is placed above the name and title of the signatory.

Gustavo Gonnelli
Jefe de Proyecto



Buenos Aires, 11 de diciembre de 2017

CSC/CAR 3449/2017

Señora
Adriana Córdoba
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El Tirador 901, Parque Leloir, Ituzaingó

Señora
Teresa Malalán
Fundación ECOSUR
Av. Directorio 141 Dto. 3 C.A.B.A.

Presente

Ref.: Préstamo 3256/OC-AR Programa de
Saneamiento Ambiental de la Cuenca del
Río Reconquista.

De nuestra consideración:

Nos dirigimos a ustedes nuevamente con relación a su carta del 18 de septiembre de 2017, sobre la que acusamos recibo mediante nota CSC/CAR 2930/2017 del 9 de octubre de 2017. Tal como lo previmos en esa oportunidad, hemos realizado las consultas correspondientes con la Unidad de Coordinación y Ejecución de Proyectos de Obras (UCEPO), responsable por la ejecución de las obras de este programa, con base en lo cual les informamos lo siguiente:

A la fecha el programa cuenta con cuatro obras básicas y prioritarias en construcción y cinco obras que estarán iniciando trabajos próximamente. Todas estas obras cuentan con Estudios de Impacto Ambiental y Social (EIAyS), Declaraciones de Aptitud Ambiental (expedidas por el Organismo Provincial de Desarrollo Sostenible, autoridad competente en la Provincia de Buenos Aires para esta función) y se han realizado audiencias públicas. Asimismo, durante 2017, el Banco se ha interesado porque la UCEPO mejore la calidad de los EIAyS de cada proyecto y fortalezca los procesos de consulta pública, en línea con los requerimientos del Banco.

La mayoría de estas obras fueron identificadas como prioritarias en las áreas de mayor riesgo sanitario mediante una operación de Cooperación Técnica financiada por el Banco (ATN/OC-12571-AR) realizada durante el diseño del programa, siendo uno de los parámetros considerados en la selección de dichas obras la vulnerabilidad social y sanitaria de la población beneficiaria.

Tanto las obras iniciadas como las que se iniciarán próximamente comprenden los siguientes tipos de obra: (i) cuatro redes de alcantarillado sanitario, (ii) dos drenajes pluviales (zanjones), actualmente colmatados de residuos sólidos, (iii) un camino de borde cuyo objetivo es contener el avance de poblaciones que se ubican en áreas inundables y contaminadas por residuos y

proveer conectividad con la trama urbana formal, y (iv) dos acueductos de agua potable. No hay planes de reasentamiento en ejecución financiados por el programa.

Por otro lado, el Plan de Gestión Integral de la Cuenca del Río Reconquista (PGICRR) permitirá la priorización y planificación de las demás obras a realizarse bajo el Programa. El PGICRR va a ser elaborado mediante la metodología de Participación con Visión Compartida (PVC) juntamente con todos los actores de la cuenca. Dicha metodología está diseñada para analizar los recursos hídricos existentes desde diferentes perspectivas y apoyar el diálogo según los objetivos de todas las partes interesadas. El PGICRR está actualmente en proceso de licitación, luego del correspondiente llamado a Expresión de Interés. Dentro del PGICRR se desarrollará el Plan de Ordenamiento Territorial de la Cuenca del Río Reconquista (POTCRR) que integrará los planes de cada Municipio.

Para la preparación e implementación del PGICRR, el Comité de Cuenca del Río Reconquista (COMIREC) debe coordinar sus acciones tanto con la Autoridad del Agua (ADA) como con el OPDS. Con respecto a la Coordinación Ecológica Área Metropolitana Sociedad del Estado (CEAMSE) desde el diseño del Programa fue reconocida como entidad con responsabilidad en la disposición final de residuos domiciliarios recolectados en 22 distritos municipales del Conurbano Bonaerense.

Finalmente, el Programa prevé el fortalecimiento del COMIREC y la preparación de una estrategia de comunicación para facilitar la relación del mismo con otras instituciones y con la comunidad, con la visión de conformar una Autoridad de Cuenca autárquica y sustentable a largo plazo. En ese sentido, haremos seguimiento para que el COMIREC, en coordinación con la UCEPO, pongan a disposición del público más información sobre el Programa, incluyendo los avances en el PGICRR, el POTCRR, las obras en ejecución y las que se incorporen al Programa. Los nueve EIAyS del Programa estarán siendo publicados, una vez sean actualizados de manera consistente con los requisitos ambientales y sociales del Banco, en el siguiente enlace: http://www.gba.gob.ar/comirec/obras_infraestructura

Esperamos que la información brindada en esta carta responda a las inquietudes presentadas por sus organizaciones. Sin perjuicio de los contactos que entendemos ustedes han mantenido o puedan seguir manteniendo con COMIREC y/o la UCEPO, como entidades responsables por la ejecución del Programa, quisiéramos expresar nuestra disposición para reunimos con ustedes para escuchar cualquier inquietud adicional que puedan tener sobre lo referido en esta carta o cualquier otro asunto relativo al Programa. A estos efectos, les informamos que el equipo de proyecto del Banco se encuentra coordinando una misión de monitoreo para inicios de 2018. De ser de su interés, para contactar al equipo de proyecto del Banco y coordinar una reunión durante dicha misión, pueden escribir al Jefe de Equipo, Sr. Gustavo Gonnelli ggonnelli@iadb.org

Sin otro particular, saludamos a usted atentamente.



José Luis Lupo
Gerente General de Departamento de
Países del Cono Sur y Representante
del BID en Argentina

Communication of October 2017



Buenos Aires, 9 de octubre de 2017

CSC/CAR 2930/2017

Señoras
Adriana Córdoba - Teresa Malalán
Asociación Civil COEPSA - Fundación ECOSUR
Presente

Ref.: Préstamo 3256/OC-AR Programa de Saneamiento
Ambiental de la Cuenca del Río Reconquista.
Avances del proyecto AR-L1121 - COEPSA y ECOSUR.

De nuestra consideración:

Acusamos recibo de su nota de fecha 18 de septiembre de 2017, con relación al Programa de Saneamiento Ambiental de la Cuenca del Río Reconquista, Provincia de Buenos Aires, República Argentina.

Sobre el particular, ponemos en su conocimiento que el Banco realizará las consultas correspondientes a la unidad ejecutora del proyecto en la provincia de Buenos Aires, responsable por la ejecución de este programa, para brindarles una respuesta adecuada con sus preocupaciones.

Sin otro particular, saludamos a usted atentamente.

A handwritten signature in black ink, appearing to read "Jose Luis Lupo", is positioned above the printed name and title.

Jose Luis Lupo
Representante del BID
en Argentina