ANNEX F: UNDP SOCIAL AND ENVIRONMENTAL AND SOCIAL SCREENING

The completed template, which constitutes the Social and Environmental Screening Report, must be included as an annex to the Project Document. Please refer to the <u>Social and Environmental Screening Procedure</u> and <u>Toolkit</u> for guidance on how to answer the 6 questions.

Project Information

Pro	oject Information	
1.	Project Title	Integrated Environmental Management of the Río Motagua Watershed
2.	Project Number	PIMS 5714
3.	Location (Global/Region/Country)	Guatemala and Honduras

Part A. Integrating Overarching Principles to Strengthen Social and Environmental Sustainability

QUESTION 1: How Does the Project Integrate the Overarching Principles in order to Strengthen Social and Environmental Sustainability?

Briefly describe in the space below how the Project mainstreams the human-rights based approach

The project will improve the integrated management of surface and groundwater resources of the Río Motagua and reduce land-based sources of contamination and unintentional emissions of persistent organic pollutants (U-POPs), to mitigate impacts to marine-coastal ecosystems and the livelihoods of the local populations. The proposed project's objective is to adopt a human-rights-based approach in its implementation of field activities necessary for protecting human life and the environment; in doing so the project will assist the governments of Guatemala and Honduras to realize civil, economic, social and cultural rights of all project participants and beneficiaries. In addition, the project will promote nondiscrimination and equality, including women, indigenous people, economically disadvantaged communities, and other vulnerable groups. The project will support meaningful participation and the inclusion of all stakeholders in both countries; to this end the final project design includes a Stakeholder Participation Plan with the objectives of: a) clearly identifying the basic roles and responsibilities of the main participants in the project; b) ensuring full knowledge of those involved concerning the progress and obstacles of project development and taking advantage of the experience and skills of the participants to enhance project activities; and c) identifying key instances in the project cycle where stakeholder involvement will occur. The project also promotes accountability and the rule of law and identifies mechanisms to address grievances through the Access to Information and Complaints Offices in both countries and through UNDP's mechanism for addressing complaints, grievances, and suggestions. The project will respect the human rights of all project participants regardless of their race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status.

Briefly describe in the space below how the Project is likely to improve gender equality and women's empowerment

The project improves gender equality and women's empowerment by promoting their equal representation and by making them active participants in decision-making processes and in the implementation of actions to address land-based sources of contamination and unintentional emissions of persistent organic pollutants (U-POPs) in the Motagua River watershed, thereby contributing to their well-being and the well-being of their families. The project will support pilot initiatives for the integrated management of the Motagua River watershed, including management of wastewater and solid wastes, which will offer opportunities for women's participation in solving the problem of contamination at the local level; women will be involved in these interventions as they play a determining role in the management of domestic solid waste. Women will also benefit from training and capacity building, especially regarding IRBM methodologies. Thus women will be part the proposed solutions to the contamination caused by domestic solid waste and wastewater and the excessive use of agrochemicals that impact local water resources. The project will incorporate gender considerations into all phases of its life cycle, and includes a Gender Strategy and Action Plan designed specifically to ensure that the concerns and experiences of women (as well as men) are an integral part of the development, implementation,

and M&E of the project. The Gender Strategy and Action Plan outlines activities and specific indicators to ensure gender participation and gender equality. In addition, the Stakeholder Participation Plan identifies women and women's groups in both countries that will be directly involved in project implementation. Women will be regularly informed about the progress of the project and how it impacts them. The project is classified as Gender Responsive: the results address the different needs of men and women, there is equitable distribution of benefits, resources, status, and rights; however, the project does not address the root causes of inequality in their lives.

Briefly describe in the space below how the Project mainstreams environmental sustainability

The project's objective is to improve the integrated management of surface and groundwater resources of the Río Motagua and reduce sources of land-based pollution (solid wastes, U-POPs, nutrients, and wastewater) to mitigate the impacts to river and marine-coastal ecosystems, as well as the well-being of the populations who depend on these healthy ecosystems. As such, the project will integrate environmental sustainability into the watershed and the management of solid wastes through improving the capacities of the principal institutions and key stakeholders, and by strengthening and consolidating the institutional, policy, and legal frameworks for planning the integrated management of water resources and the sound management of chemicals and solid waste. In addition, the project will implement innovative pilot initiatives in the Río Motagua watershed that will contribute to reduce land-based pollution of water resources in the upper, mid, and lower/coastal parts of the Río Motagua watershed including the recovery and conservation of the water recharge areas of aquifers, improving water quality and enhancing the health of aquatic ecosystems through wastewater treatment, control of surface and groundwater contamination through the reduction of soil erosion and reforestation, and the sustainable management municipal solid wastes (reduction o U-POPs emission and plastic waste).

Part B. Identifying and Managing Social and Environmental Risks

QUESTION 2: What are the Potential Social and Environmental Risks? Note: Describe briefly potential social and environmental risks identified in Attachment 1 – Risk Screening Checklist (based on any "Yes" responses). If no risks have been identified in Attachment 1 then note "No Risks Identified" and skip to Question 4 and Select "Low Risk". Questions 5 and 6 not required for Low Risk Projects.	social and en	vironmental risk	el of significance of the potential s? I and 5 below before proceeding to	QUESTION 6: What social and environmental assessment and management measures have been conducted and/or are required to address potential risks (for Risks with Moderate and High Significance)?
Risk Description	Impact and Probability (1-5)	Significance (Low, Moderate, High)	Comments	Description of assessment and management measures as reflected in the Project design. If ESIA or SESA is required note that the assessment should consider all potential impacts and risks.
Risk 1: Is there a likelihood that the proposed Project would have adverse impacts on gender equality and/or the situation of women and girls? Risk 2: Would the Project potentially reproduce discriminations against women	I = 3 P = 1	Low	The project will include the active participation of women and will address their different needs related to the reduction of land-based sources of pollution in the Río Motagua watershed. In	

based on gender, especially regarding participation in design and implementation or access to opportunities and benefits? Risk 3: Would the Project potentially limit women's ability to use, develop and protect natural resources, taking into account different roles and positions of women and men in accessing environmental goods and services?			addition, the project will promote the equitable distribution of benefits for women as for men. The project design includes a Gender Action Plan in which activities and specific indicators are outlined to ensure gender participation and gender equality.	
Risk 4: Are any Project activities proposed within or adjacent to critical habitats and/or environmentally sensitive areas, including legally protected areas (e.g. nature reserve, national park), areas proposed for protection, or recognized as such by authoritative sources and/or indigenous peoples or local communities?	I = 1 P = 5	Low	As part of the planned activities to implement pilot projects with low-cost technology to reduce land-based pollution of water resources, the project will implement actions within or adjacent to legally protected areas (e.g., Cerro San Gil Water Spring Protected Reserve in Guatemala). Activities will contribute towards sustainable land and water use and management in these areas.	
Risk 5: Does the Project involve harvesting of natural forests, plantation development, or reforestation?	I = 1 P = 5	Low	The project seeks to promote pilot initiatives for the integrated management of the water resources of the Río Motagua, which include activities to rehabilitate the watershed through actions around conservation, protection, reforestation, regeneration, and remediation. Reforestation actions will contribute to the rehabilitation of riparian and coastal ecosystems in the Río Motagua watershed. Reforestation actions will take place using native species, only. The team implementing the project will b made aware about this as part of orientation	

			activities to be conducted during the hiring process, including knowledge about the GEF Policy: SD/PL/03 (updated on February 19, 2015) - Agency Minimum Standards on Environmental and Social Safeguards, which among the Key Principles for GEF Operations states that "The GEF shall not finance the introduction or use of potentially invasive, non-indigenous species."	
	I = 4 P = 2	Moderate	The occurrence and intensity of climate change may affect the pilot interventions for the management of water resources and solid wastes. Guatemala and Honduras are prone to the impact of tropical storms and torrential rains that may affect project outcomes.	The land investments planned for the project apply a focus of integrated management that seeks to make the riparian and coastal ecosystems become more resilient to the impacts of climate change. Climate change considerations were incorporated into the final project design, including assessing the threat of climate change to the Río Motagua as part of the Watershed Diagnostic Analysis (WDA); the development of the Binational Strategic Action Program (SAP); and building institutional capacity (training and monitoring) for integrated river basin management and reduced land-based pollution. Climate change risks were also assessed in the development of pilot projects.
Risk 7: Would the Project pose potential risks to community health and safety due to the transport, storage, and use and/or disposal of hazardous or dangerous materials (e.g. explosives, fuel and other chemicals during construction and operation)?	I = 3 P = 1	Low	The project will implement low-cost, small-scale technology options to reduce land-based pollution of water resources at the local level, including biodigesters and wastewater treatment plants. The potential risk to occupational health and safety may come from the exposure to bacteria and the principal pathway of exposure may be inhalation. The project will foster the adoption of international hazard guidelines regarding the operation of WWTP such as those of the	

			International Labour Organization of the Untied National to reduce this risk.	
Risk 8: Does the Project involve large-scale infrastructure development (e.g. dams, roads, buildings)?	I = 3 P = 1	Low	The project also includes the development of eight (8) pre-investment studies for the implementation of large-scale infrastructure and equipment for the handling and disposal of land-based pollutants affecting hydrological resources. This will include technical and operational pre-feasibility studies for each pre-investment, including as environmental and social safeguard assessments (including EIA requirements). Actual construction of large infrastructure will not happen during the life of the project.	
Risk 9: Does the Project pose potential risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during Project construction, operation, or decommissioning?	I = 3 P = 3	Moderate	At present, the COVID-19 pandemic poses a risk to all the society of getting infected. However, the project has developed a biosafety protocol for the office and to carry field activities	The project is monitoring the evolution of the pandemic and following all the instructions and recommendations from the national government about how to engage with other people, travel and work during this period of lockdown and the reopening of the economy, which is taking place gradually in Honduras.
Risk 10: Would the Project possibly result in economic displacement (e.g. loss of assets or access to resources due to land acquisition or access restrictions – even in the absence of physical relocation)?	I = 3 P = 1	Low	The project will implement actions for the rehabilitation (conservation and protection, reforestation, natural regeneration, remediation) of riparian ecosystems in the Río Motagua watershed in Honduras.	
Risk 11: Are indigenous peoples present in the Project area (including Project area of influence)?	I = 1 P = 5	Low	The project looks to support, among others, the populations dwelling along the Río Motagua, which in some cases pertain to	

			indigenous peoples, partic in Guatemala (e.g., Kaqo K'iché, Kekchi, and gar groups) in the adoption of integrated management water resources.	hikel, rifuna of the	
Risk 12: Has there been an absence of culturally appropriate consultations carried out with the objective of achieving FPIC on matters that may affect the rights and interests, lands, resources, territories and traditional livelihoods of the indigenous peoples concerned?	I = 3 P = 3	Moderate	consultations were carrie during the final project des inform them about the p and ensure their participat	in the nolder initial d out ign to roject ion.	The project will be implemented with consideration given to the rights of indigenous peoples for their effective participation in environmental and development projects as established under Guatemalan law. An Indigenous Peoples Participation Plan will be developed during the first year of project implementation to satisfy FPIC requirements. Also, as part of the mitigation measures, the project's Advisory Technical Committee (TAC) will include the participation of the Indigenous Group for Climate Change in Guatemala (Mesa Indigenas de Cambio Climático de Guatemala), of which the Asociación Sotzil is a member and has experience in social and environmental safeguards; the Asociación Sotzil is also a project co-financier. The project will also make use of the Access to Information and Complaints Office in Guatemala, of which the Ministry of Natural Resources and Environment (MARN) of Guatemala is member. The project will also include UNDP's mechanism for addressing complaints, grievances, and suggestions; through this mechanism the project will receive useful information that will serve to continuously improve and prevent conflicts that the project's actions may generate regarding indigenous participation. Finally, the indigenous communities will be fully consulted during project implementation and will actively participate in the project's execution to ensure that their rights and concerns are taken into account. In the case of Honduras there is no presence of indigenous communities or indigenous lands in the area where the project will be implemented.
	QUESTION 4:	What is the ove	rall Project risk categorization	1?	
		Select one (se	e <u>SESP</u> for guidance) <i>Low Risk</i>		Comments
			Moderate Risk	X	Given that an Indigenous Peoples Participation Plan will need to be developed during the first year of project implementation

		and climate change risk to the project, the overall project risk categorization is moderate. Final consultations with indigenous peoples in Guatemala will be conducted during project implementation. All project activities in Guatemala for Outcomes 1 and 2 of the project should not proceed until final consultations with indigenous peoples are conducted; the pilot projects (Outcome 3) may proceed as indigenous populations in the prioritized municipalities are very low or are not present and consultations were carried out through meetings with the Municipal Councils, which represent indigenous peoples' interests at the local level. Climate change management will be addressed as part of the development of the Río Motagua WDA and its strategic action plan (SAP). No other risk mitigation measures are necessary because of the nature of the WDA and SAP, which include specific actions to address climate change impacts. The risk mitigation and risk evaluation measures will be fully incorporated into the UNDP Risk Log, which will be updated in the ATLAS system throughout the life of the project, as necessary. The impacts of COVID-19 on the project's implementation will be address with adaptive management. The evolution of the pandemic is continuously being monitored to ensure the project carries out activities safely and in compliance with biosafety protocols (for the case in Honduras).
High Risk		
QUESTION 5: Based on the identified risks and risk categoriz what requirements of the SES are relevant?	ation,	
Check all that apply		Comments
Principle 1: Human Rights		
Principle 2: Gender Equality and Women's Empowerment		
Biodiversity Conservation and Natural Resource Management		
2. Climate Change Mitigation and Adaptation	Х	

3. Community Health, Safety and Working Conditions	X
4. Cultural Heritage	
5. Displacement and Resettlement	
6. Indigenous Peoples	X
7. Pollution Prevention and Resource Efficiency	

Final Sign Off

Signature	Date	Description
QA Assessor		UNDP staff member responsible for the Project, typically a UNDP Programme Officer. Final signature confirms they
Astrid Mejia	27 August 2020	have "checked" to ensure that the SESP is adequately conducted.
Especialista de Programa		
QA Approver		UNDP senior manager, typically the UNDP Deputy Country Director (DCD), Country Director (CD), Deputy Resident Representative (DRR), or Resident Representative (RR). The QA Approver cannot also be the QA Assessor. Final signature confirms they have "cleared" the SESP prior to submittal to the PAC.
Rose Diegues		
Representante Residente Adjunto		
PAC Chair		UNDP chair of the PAC. In some cases PAC Chair may also be the QA Approver. Final signature confirms that the SESP was considered as part of the project appraisal and considered in recommendations of the PAC.
Rose Diegues		
Representante Residente Adjunto		

SESP Attachment 1. Social and Environmental Risk Screening Checklist

Chec	klist Potential Social and Environmental Risks	
Princ	iples 1: Human Rights	Answer (Yes/No)
1.	Could the Project lead to adverse impacts on enjoyment of the human rights (civil, political, economic, social or cultural) of the affected population and particularly of marginalized groups?	NO
2.	Is there a likelihood that the Project would have inequitable or discriminatory adverse impacts on affected populations, particularly people living in poverty or marginalized or excluded individuals or groups? 1	NO
3.	Could the Project potentially restrict availability, quality of and access to resources or basic services, in particular to marginalized individuals or groups?	NO
4.	Is there likelihood that the Project would exclude any potentially affected stakeholders, in particular marginalized groups, from fully participating in decisions that may affect them?	NO
5.	Is there a risk that duty-bearers do not have the capacity to meet their obligations in the Project?	NO
6.	Is there a risk that rights-holders do not have the capacity to claim their rights?	NO
7.	Have local communities or individuals, given the opportunity, raised human rights concerns regarding the Project during the stakeholder engagement process?	NO
8.	Is there a risk that the Project would exacerbate conflicts among and/or the risk of violence to project-affected communities and individuals?	NO
Princ	iple 2: Gender Equality and Women's Empowerment	
1.	Is there a likelihood that the proposed Project would have adverse impacts on gender equality and/or the situation of women and girls?	YES
2.	Would the Project potentially reproduce discriminations against women based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?	YES
3.	Have women's groups/leaders raised gender equality concerns regarding the Project during the stakeholder engagement process and has this been included in the overall Project proposal and in the risk assessment?	NO
4.	Would the Project potentially limit women's ability to use, develop and protect natural resources, taking into account different roles and positions of women and men in accessing environmental goods and services? For example, activities that could lead to natural resources degradation or depletion in communities who depend on these resources for their livelihoods and well being	YES
	ciple 3: Environmental Sustainability: Screening questions regarding environmental risks are encompassed by the fic Standard-related questions below	
Stan	dard 1: Biodiversity Conservation and Sustainable Natural Resource Management	
1.1	Would the Project potentially cause adverse impacts to habitats (e.g. modified, natural, and critical habitats) and/or ecosystems and ecosystem services?	NO
For e	xample, through habitat loss, conversion or degradation, fragmentation, hydrological changes	

¹ Prohibited grounds of discrimination include race, ethnicity, gender, age, language, disability, sexual orientation, religion, political or other opinion, national or social or geographical origin, property, birth or other status including as an indigenous person or as a member of a minority. References to "women and men" or similar is understood to include women and men, boys and girls, and other groups discriminated against based on their gender identities, such as transgender people and transsexuals.

1.2	Are any Project activities proposed within or adjacent to critical habitats and/or environmentally sensitive	YES
	areas, including legally protected areas (e.g. nature reserve, national park), areas proposed for protection, or recognized as such by authoritative sources and/or indigenous peoples or local communities?	
1.3	Does the Project involve changes to the use of lands and resources that may have adverse impacts on habitats, ecosystems, and/or livelihoods? (Note: if restrictions and/or limitations of access to lands would apply, refer to Standard 5)	NO
1.4	Would Project activities pose risks to endangered species?	NO
1.5	Would the Project pose a risk of introducing invasive alien species?	NO
1.6	Does the Project involve harvesting of natural forests, plantation development, or reforestation?	YES
1.7	Does the Project involve the production and/or harvesting of fish populations or other aquatic species?	NO
1.8	Does the Project involve significant extraction, diversion or containment of surface or ground water?	NO
	For example, construction of dams, reservoirs, river basin developments, groundwater extraction	
1.9	Does the Project involve utilization of genetic resources? (e.g. collection and/or harvesting, commercial development)	NO
1.10	Would the Project generate potential adverse transboundary or global environmental concerns?	NO
1.11	Would the Project result in secondary or consequential development activities which could lead to adverse social and environmental effects, or would it generate cumulative impacts with other known existing or planned activities in the area?	NO
	For example, a new road through forested lands will generate direct environmental and social impacts (e.g. felling of trees, earthworks, potential relocation of inhabitants). The new road may also facilitate encroachment on lands by illegal settlers or generate unplanned commercial development along the route, potentially in sensitive areas. These are indirect, secondary, or induced impacts that need to be considered. Also, if similar developments in the same forested area are planned, then cumulative impacts of multiple activities (even if not part of the same Project) need to be considered.	
Standa	ard 2: Climate Change Mitigation and Adaptation	
2.1	Will the proposed Project result in significant ² greenhouse gas emissions or may exacerbate climate change?	NO
2.2	Would the potential outcomes of the Project be sensitive or vulnerable to potential impacts of climate change?	YES
2.3	Is the proposed Project likely to directly or indirectly increase social and environmental vulnerability to climate change now or in the future (also known as maladaptive practices)?	NO
	For example, changes to land use planning may encourage further development of floodplains, potentially increasing the population's vulnerability to climate change, specifically flooding	
Standa	ard 3: Community Health, Safety and Working Conditions	
3.1	Would elements of Project construction, operation, or decommissioning pose potential safety risks to local communities?	NO
3.2	Would the Project pose potential risks to community health and safety due to the transport, storage, and use and/or disposal of hazardous or dangerous materials (e.g. explosives, fuel and other chemicals during construction and operation)?	YES
3.3	Does the Project involve large-scale infrastructure development (e.g. dams, roads, buildings)?	YES
3.4	Would failure of structural elements of the Project pose risks to communities? (e.g. collapse of buildings or infrastructure)	NO

² In regards to CO₂, 'significant emissions' corresponds generally to more than 25,000 tons per year (from both direct and indirect sources). [The Guidance Note on Climate Change Mitigation and Adaptation provides additional information on GHG emissions.]

3.5	Would the proposed Project be susceptible to or lead to increased vulnerability to earthquakes, subsidence, landslides, erosion, flooding or extreme climatic conditions?	NO
3.6	Would the Project result in potential increased health risks (e.g. from water-borne or other vector-borne diseases or communicable infections such as HIV/AIDS)?	NO
3.7	Does the Project pose potential risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during Project construction, operation, or decommissioning?	YES
3.8	Does the Project involve support for employment or livelihoods that may fail to comply with national and international labor standards (i.e. principles and standards of ILO fundamental conventions)?	NO
3.9	Does the Project engage security personnel that may pose a potential risk to health and safety of communities and/or individuals (e.g. due to a lack of adequate training or accountability)?	NO
Stand	ard 4: Cultural Heritage	
4.1	Will the proposed Project result in interventions that would potentially adversely impact sites, structures, or objects with historical, cultural, artistic, traditional or religious values or intangible forms of culture (e.g. knowledge, innovations, practices)? (Note: Projects intended to protect and conserve Cultural Heritage may also have inadvertent adverse impacts)	NO
4.2	Does the Project propose utilizing tangible and/or intangible forms of cultural heritage for commercial or other purposes?	NO
Stand	ard 5: Displacement and Resettlement	
5.1	Would the Project potentially involve temporary or permanent and full or partial physical displacement?	NO
5.2	Would the Project possibly result in economic displacement (e.g. loss of assets or access to resources due to land acquisition or access restrictions – even in the absence of physical relocation)?	YES
5.3	Is there a risk that the Project would lead to forced evictions? ³	NO
5.4	Would the proposed Project possibly affect land tenure arrangements and/or community based property rights/customary rights to land, territories and/or resources?	NO
Stand	ard 6: Indigenous Peoples	
6.1	Are indigenous peoples present in the Project area (including Project area of influence)?	YES
6.2	Is it likely that the Project or portions of the Project will be located on lands and territories claimed by indigenous peoples?	NO
6.3	Would the proposed Project potentially affect the human rights, lands, natural resources, territories, and traditional livelihoods of indigenous peoples (regardless of whether indigenous peoples possess the legal titles to such areas, whether the Project is located within or outside of the lands and territories inhabited by the affected peoples, or whether the indigenous peoples are recognized as indigenous peoples by the country in question)? If the answer to the screening question 6.3 is "yes" the potential risk impacts are considered potentially severe	NO
6.4	and/or critical and the Project would be categorized as either Moderate or High Risk. Has there been an absence of culturally appropriate consultations carried out with the objective of achieving FPIC on matters that may affect the rights and interests, lands, resources, territories and traditional livelihoods of the indigenous peoples concerned?	YES

³ Forced evictions include acts and/or omissions involving the coerced or involuntary displacement of individuals, groups, or communities from homes and/or lands and common property resources that were occupied or depended upon, thus eliminating the ability of an individual, group, or community to reside or work in a particular dwelling, residence, or location without the provision of, and access to, appropriate forms of legal or other protections.

6.5	Does the proposed Project involve the utilization and/or commercial development of natural resources on lands and territories claimed by indigenous peoples?	NO
6.6	Is there a potential for forced eviction or the whole or partial physical or economic displacement of indigenous peoples, including through access restrictions to lands, territories, and resources?	NO
6.7	Would the Project adversely affect the development priorities of indigenous peoples as defined by them?	NO
6.8	Would the Project potentially affect the physical and cultural survival of indigenous peoples?	NO
6.9	Would the Project potentially affect the Cultural Heritage of indigenous peoples, including through the commercialization or use of their traditional knowledge and practices?	NO
Standard 7: Pollution Prevention and Resource Efficiency		
7.1	Would the Project potentially result in the release of pollutants to the environment due to routine or non-routine circumstances with the potential for adverse local, regional, and/or transboundary impacts?	NO
7.2	Would the proposed Project potentially result in the generation of waste (both hazardous and non-hazardous)?	NO
7.3	Will the proposed Project potentially involve the manufacture, trade, release, and/or use of hazardous chemicals and/or materials? Does the Project propose use of chemicals or materials subject to international bans or phase-outs?	NO
	For example, DDT, PCBs and other chemicals listed in international conventions such as the Stockholm Conventions on Persistent Organic Pollutants or the Montreal Protocol	
7.4	Will the proposed Project involve the application of pesticides that may have a negative effect on the environment or human health?	NO
7.5	Does the Project include activities that require significant consumption of raw materials, energy, and/or water?	NO