

# Eol Reviews by TRC

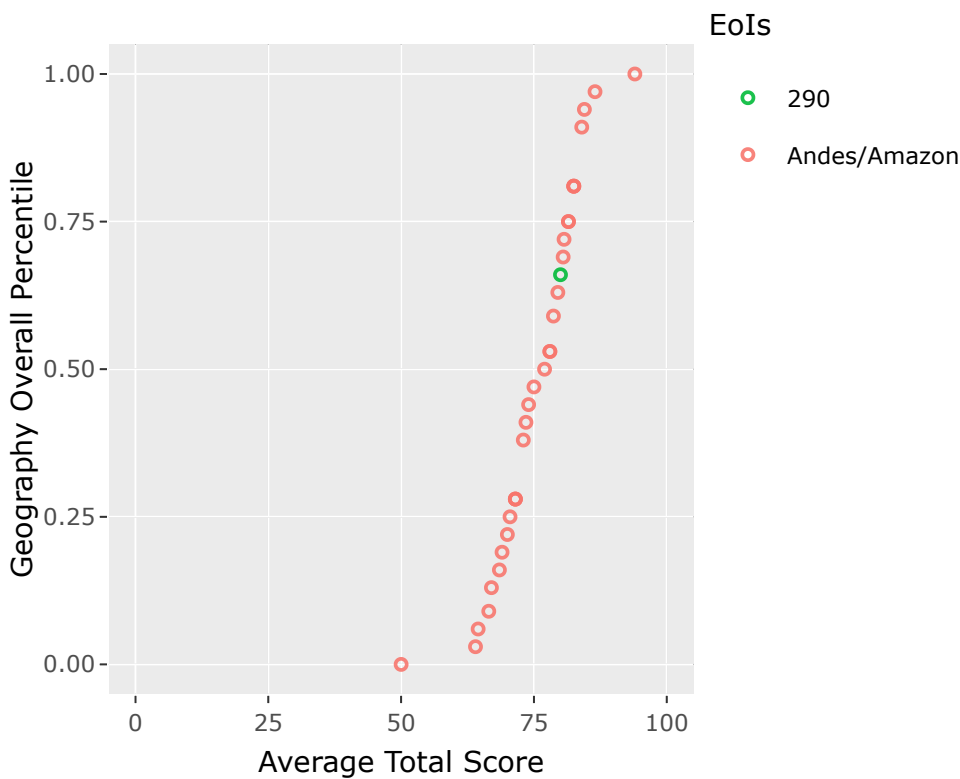
## Assessment of Eol: 290

Organization: Amerindian Peoples Association

### Eol Metadata

Eol	Geography	state	Section 1	Section 2	Section 3	Total
290	Andes/Amazon	Guyana	26	23	28	77
290	Andes/Amazon	Guyana	23	33	27	83

Performance of Eol 290 in Andes/Amazon - Percentile by Average Score



## Section 1 - Experience & strengths relevant to the proposed Indigenous territory, landscape/seascape (Total Points: 30)

### A) Importance of the landscape/seascape/indigenous territory for biodiversity, with additional consideration to climate benefits.

1. Is the proposed territory/landscape/seascape a globally important area for biodiversity?

Scoring:

- Not significant;
- Low Significance;
- Moderate Significance;
- Medium-high Significance;
- High Significance;
- Exceptional Significance

*Reviewer A: 5/5 Reviewer B: 5/5*

**Average: 5/5**

*Evidence A:* high levels of biodiversity, importance to climate in the region

*Evidence B:* The areas proposed in the Eol are part of a globally significant High Biodiversity Wilderness Area (HBWA) with high species rarity and endemism. Areas are primarily highly intact forest and also include grassland, savannah, bush forest and significant river flows.

2. Is the area important for climate mitigation?

Scoring:

- >50 t/ha - Low;
- 50 - 100 t/ha - Moderate;
- >100 t/ha - High

*Reviewer A: 2/2 Reviewer B: 2/2*

**Average: 2/2**

*Evidence A:* as determined from map. The region is reported to be critical to climate stability in the region.

*Evidence B:* Proposed Areas contain high levels of irrecoverable carbon. Highly intact forests coupled with extensive river flows contribute to the climate influence of the Amazon Region.

### B) Geographical focus in an area under IPLC governance.

3. Is the area held and managed by IPLC under community-based governance systems?

Scoring:

- IPLC governance (rights and institutions) not evident;
- Project areas are marginally under IPLC governance (spatially or politically);
- Project areas are partially under IPLC systems of governance (spatially or politically);
- Project areas are largely under IPLC governance, but IPLC rights and/or institutions face significant constraints;
- Project areas are held and managed under IPLC governance systems, with some limitations;
- Project areas are held and managed under strong and active IPLC governance systems

*Reviewer A: 4/5 Reviewer B: 3/5*

**Average: 3.5/5**

*Evidence A:* Some of the areas are under IPLC systems of governance and others in form of agreement. the organizations seem to be very active in bringing the lands under community governance. However there

*Evidence B:* Proposed areas are not part of formally titled Amerindian lands. Most Amerindian communities hold collective title to the lands surrounding their communities. However, many communities have applied for extensions of their title. The proposed areas are considered by IPLCs to be part of their ancestral lands and are effectively governed by the communities, but without formal title. Traditional livelihood activities, as well as conservation activities are conducted by the IPLC communities. The government recognizes traditional use rights, but controls sub-surface rights on all lands, including those formally titled. A major focus of this EoI includes expanding recognition of lands and IPLC rights.

#### 4. Does the proposal explain the unique cultural significance of the area to IPLCs?

*Scoring:*

- No explanation given of unique significance to IPLCs;
- Significance of site(s) vaguely described;
- Unique significance of project site(s) clearly explained

*Reviewer A: 2/2 Reviewer B: 1/2*

**Average: 1.5/2**

*Evidence A:* The significance to the 21 mainly Wapichan villages and communities in the South 18 Patamona and Macushi villages across the North Pakaraimas as is their efforts to protect land and community

*Evidence B:* The cultural significance is briefly described, with more detail on myths and legends for the North Pakaraimas areas. A more in-depth discussion of the traditional cultural and livelihood uses of the areas would strengthen a future proposal.

#### C) Vulnerability of the proposed IPLCs as well as their lands/waters/natural resources to threats.

#### 5. Is the area vulnerable to threats/current risk of negative impacts to IPLC and biodiversity without action?

*Scoring:*

- No evident threats;
- Low threats;
- Moderate threats;

- Medium-high threats;
- High threats;
- Requires urgent action

*Reviewer A: 4/5 Reviewer B: 3/5*

**Average: 3.5/5**

*Evidence A:* Mining seems to be the main threat and seems to be on the increase

*Evidence B:* Mining (both legal and illegal) and infrastructure development pose significant threats to forests and biodiversity as well as to traditional lifestyles of IPLC communities. The recent discovery of oil in Guyana's off-shore waters increases the threat level due to significant revenues expected from the exploitation of this resource. If environmental issues and conservation priorities, as well as impacts on traditional lifestyles are not effectively taken into account in new infrastructure investment, increased access to now remote areas would pose an even higher threat.

D) Opportunities for ICI results - including enabling policy conditions, positive government support and presence of successful IPLC-led conservation initiatives that could be scaled up.

6. Are enabling policy conditions in place for IPLC-led conservation in the proposed area?

*Scoring:*

- Legal and policy frameworks in project areas undermine IPLC governance (either actively or through absence);
- Legal and policy frameworks recognize limited rights for IPLCs over their lands and/or resources;
- Legal and policy frameworks recognize rights over lands and resources but with constraints (e.g., lack implementing regulations);
- Legal and policy frameworks actively promote the recognition of IPLC governance

*Reviewer A: 2/3 Reviewer B: 2/3*

**Average: 2/3**

*Evidence A:* There seems to be a policy framework that recognizes the importance of biodiversity protection and the role of IPLC as reflected in agreements and projects with the state. There the recognition of land rights is limited the organizations are very actively pursuing this.

*Evidence B:* • Legal and policy frameworks actively promote the recognition of IPLC governance Guyana has pledged to place 17% of its total land area under protection as an Aichi 11 commitment. The government of Guyana (GoG) has recognized 3.8MHa as Amerindian Land, which equals 19% of the country's total land area. The GoG has also recognized that a significant portion of species and ecosystems are not adequately represented in the existing PA System. There seems to be a high political will for conservation and IPLC rights, and there is a high correlation between areas of high conservation value and IPLC lands. Expanded action on protected areas or expanded mechanisms for indigenous lands to be included in PS systems or governed by IPLCs as conservation areas would contribute to achieving Guyana's commitments

7. Is there active government support for IPLC-led conservation in the proposed country/area?

*Scoring:*

- National or sub-national governments are actively opposed to IPLC-led conservation;
- National or sub-national governments have recognized the importance of IPLC-led conservation;
- National or sub-national governments have implemented some support for IPLC-led conservation;

- National or sub-national governments are actively engaged in the promotion of IPLC rights and IPLC-led conservation

*Reviewer A: 2/3 Reviewer B: 2/3*

**Average: 2/3**

*Evidence A:* Agreements with communities suggest some support

*Evidence B:* The GoG granted absolute title to their ancestral lands to the Wai Wai people of southern Guyana. The Wai Wai declared the entire areas to be a Community Conserved Area and in 2017 Kanoshen was accepted into the National System of Protected Areas. The Kanuku Mountains Protected Area is co-managed by the indigenous communities that surround the area, who retain traditional use rights. The SRDC has been legally gazetted by the GoG and the NPDC is in the application process.

## 8. Are there successful IPLC-led conservation initiatives in the proposed area that provide a foundation for scaling up?

*Scoring:*

- No IPLC-led conservation initiatives have been implemented;
- Few IPLC-led conservation projects have been implemented in pilot stages only;
- Some IPLC-led conservation projects have been implemented beyond pilot stages;
- Relevant IPLC-led conservation projects have been well established for many years

*Reviewer A: 3/3 Reviewer B: 3/3*

**Average: 3/3**

*Evidence A:* Several projects and policy initiatives are listed. The organizations seem to be very active.

*Evidence B:* The APA and the SRDC have proposed and led conservation initiatives for nearly 30 years, including extensive mapping activities and community monitoring programs. The APA has also been active in policy advocacy for indigenous rights. Leadership has been active in national, regional and international policy processes. The SRDC was awarded the Equator Prize in 2015 for its Community Monitoring Program. The Scaling up of this program is one of the goals of this EoI

## E) Synergies with existing investments.

## 9. Are there other initiatives (relevant projects) that provide complementary support for IPLC-led conservation in the geography?

*Scoring:*

- Few to no complementary projects/investment;
- Complementary projects/investments are small, or are tangentially related to project goals;
- Complementary Projects/investments align strongly with project goals and investments are substantial

*Reviewer A: 2/2 Reviewer B: 2/3*

**Average: 2/2**

*Evidence A:* several relevant projects are listed

*Evidence B:* The co-financing landscape of Guyana includes USD 467M over 180 projects related to the environment, biodiversity, and climate change. The APA is currently managing 2 major grants totaling approximately USD 4M focusing on forest conservation and tenure. A 5-year grant from NORAD is in its final year, but application for an additional 5 year grant is indicated.

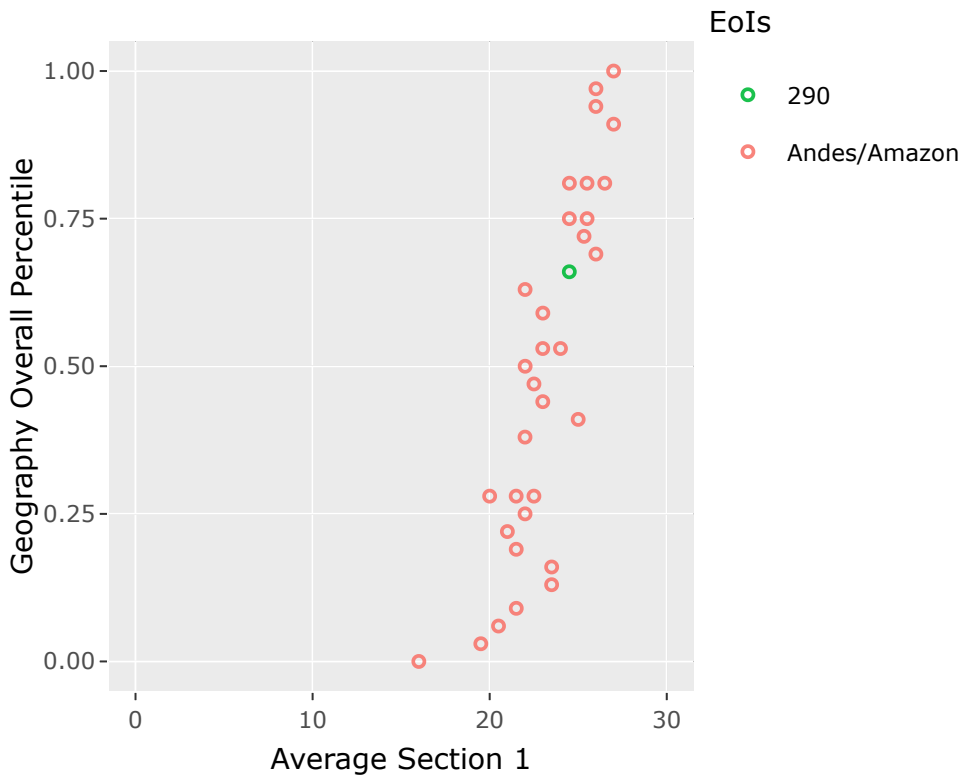
Section 1:

Reviewer A Total Score: 26/30

Reviewer B Total Score: 23/30

Average Total Score: 24.5/30

Performance of Eol 290 in Andes/Amazon - Percentile by Average Score (Section 1)



## Section 2 - Quality and ability of the proposed approach and interventions to achieve transformational impact that generate the global environmental benefits (Total Points: 40)

### A) Quality of proposed approach and ability to support traditional structures, knowledge and community practices in the delivery of global environmental benefits.

1. Is the proposed approach well aligned with the overall objective of the ICI to: Enhance Indigenous Peoples' and Local Communities' (IPLCs) efforts to steward land, waters and natural resources to deliver global environmental benefits?

Scoring:

- Weakly aligned;
- Partially aligned;
- Well aligned;
- Exceptionally well aligned

*Reviewer A: 1/3 Reviewer B: 3/3*

**Average: 2/3**

*Evidence A:* The project focuses on developing conservation plans and conservation team to do monitoring. Not entirely sure how much the monitoring contributes to mitigating the main threat which comes from mining . There is indication that advocacy will happen to secur recognition of IPCL conservation. and financing from the state, but it does not come across as a central element. Very little emphasis on culture and livelihoods.

*Evidence B:* The EoI indicates that the project will contribute to the overall objective of the ICI at multiple levels: on the ground action to plan, implement and monitor conservation activities to protect the ability of IP ancestral lands to deliver GEBs; strengthening local IPLC governance institutions to manage IPLC lands and territories; policy advocacy at the national level to increase formal government recognition of IPLC rights; and, increasing support and financing for IPLC led conservation.

2. Does the EoI present a clear and convincing set of activities and results?

Scoring:

- The objectives and approach for this project lack clarity and cohesion, and/or do not appear to be realistic for the context;
- Activities & results defined but logic (Theory of Change) is incomplete;
- Activities and results are well-defined and cohesive but some aspects require clarification;
- The project has clear objectives and a cohesive approach with relevant activities for the context and timeline

*Reviewer A: 2/6 Reviewer B: 4/6*

**Average: 3/6**

*Evidence A:* The project focuses on developing conservation plans and conservation team to do monitoring. Not entirely sure how the main threat which comes from mining is being addressed however. There is indication that advocacy will happen to secur recognition of IPCL conservation. and financing from the state, but it does not come across as a central element. Not clear how the mining threat is being addressed.



*Evidence B:* Outcomes and outputs/results and activities are defined by not clearly separated. The overall outcome of protecting 2.7 MHa of territory under indigenous ownership and management is clearly stated but output of results and activities need work to create a clear Theory of Change. Key results such as legal recognition of proposed project areas as IP owned and managed and ongoing co-financing of activities from government-controlled oil revenues are combined with community monitoring activity descriptions. Specific activities to achieve these two key results/enabling conditions are not included. The concepts are included but need work to lay out a clearly defined path from activities to outputs/results to outcome.

### 3. Will the project (objectives and activities) contribute to overcoming identified threats and putting in place necessary enabling opportunities for IPLC-led conservation?

*Scoring:*

- Objectives and activities do not clearly address identified threats and opportunities;
- Contributions to addressing the threats and opportunities are low;
- Contributions to addressing threats and enabling conditions are slightly over-ambitious;
- The impact on threats and enabling conditions can be realistically accomplished and are sufficiently ambitious for the projects' context

*Reviewer A: 2/3 Reviewer B: 3/3*

**Average: 2.5/3**

*Evidence A:* The main threat comes from mining. The main proposed strategy to mitigate it is monitoring. The advocacy part needs more emphasis perhaps.

*Evidence B:* The outcomes/outputs/activities are realistic. However, per comments on Q.3 activities to achieve key enabling conditions should be further clarified in a full proposal.

### 4. Are the activities achievable within a \$500,000 to \$2,000,000 USD budget range in a period of 5 years of project execution?

*Scoring:*

- Activities/results not aligned with Eol range of investment;
- Activities/results Partially aligned with Eol range of investment ;
- Activities/results Well aligned with Eol range of investment ;
- Activities/results Exceptionally well aligned with Eol range of investment

*Reviewer A: 2/3 Reviewer B: 2/3*

**Average: 2/3**

*Evidence A:* NA

*Evidence B:* This would be further clarified in a project proposal.

### 5. Does the Eol include significant and concrete sources of co-financing?

*Scoring:*

- None;
- Small;
- Moderate;
- Significant

*Reviewer A: 3/3 Reviewer B: 2/3*

**Average: 2.5/3**

*Evidence A:* Several current projects with high relevance are listed

*Evidence B:* Potential for co-financing of proposed outcomes and activities is high. However, currently, the APA is in the final 6 months of a 5 year USD 2.3M grant under NORADs NICFI Program-a proposal has been submitted for an additional 5 years. If approved this funding would provide concrete co-financing for the term of ICI investment. Other co-financing is indicated for another year. The most significant and ongoing source of finance would be achieved if the project is successful in lobbying for oil revenues to be dedicated to conservation activities and to the APA and partners specifically.

B) Potential of the proposed activities to achieve IPLC-led transformational impact that generate global environmental benefits.

6. Are the estimated Global Environmental Benefits (GEF core indicators) substantial and realistic?

*Scoring:*

- Not provided;
- Very Low (below 10,000 Ha);
- Moderate (between 100,000 - 500,000 Ha);
- High (between 500,000 - 1,000,000 Ha);
- Very high above 1,000,000 Ha

*Reviewer A: 4/5 Reviewer B: 5/5*

**Average: 4.5/5**

*Evidence A:* the propose area to be impacted is very high

*Evidence B:* A total of 4.7 MHa is indicated I GEF7 Indicators 1 and 3 as areas under improved management and or practice in the EoI. Indicator 11 indicates 20,000 beneficiaries. GEF7 Indicator 1 includes the 2.7MHa represents the two proposed areas under the EoI. The current land under protection within Guyana's National PA System is 8.5% of Guyana's land area-approximately 1.8 MHa. I proposed areas were to be included within the PA system, it would mor than double the area under protection and enable Guyana to meet its commitments under Aichi 11 and its NBSAP. Precedent for inclusion of titled IP lands in the NPAS includes the 625Kha Kanoshen Community Conserved area, so potential is significant for achieving contributions to GEF7 Core Indicators.

7. Are the additional cultural and livelihoods results contributing to project objectives?

*Scoring:*

- No provided cultural or livelihood indicators for the project;
- Indicators proposed but are not clearly aligned with project goals;

- Indicators proposed and are moderately aligned with project goals;
- Additional cultural and/or livelihood indicators clearly derive from project goals

*Reviewer A: NA/3 Reviewer B: NA/3*

**Average: NaN/3**

*Evidence A:* No livelihood or cultural indicators offered

*Evidence B:* Cultural importance is briefly described, but specific indicators for culture and livelihoods are not included. The indicators section along with Theory of Change Results Framework should be strengthened as part of a full project proposal.

## 8. Does the EoI provide a clear and robust vision for long-term sustainability?

*Scoring:*

- Vision for long-term sustainability not provided;
- This project does not seem to have a clear long-term impact;
- This project will create medium-term benefits for biodiversity and IPLC governance, which future funding will hopefully build upon;
- This project will ensure long-term benefits to biodiversity and IPLC systems of governance

*Reviewer A: 2/3 Reviewer B: 3/3*

**Average: 2.5/3**

*Evidence A:* The main outputs will be management plans and monitoring teams, these will require funding and support which may come from the proposed state partnerships. This means the advocacy component is critical.

*Evidence B:* Legal recognition of indigenous lands, continued IPLC governing commitments to conservation and sustainable use and ongoing financing commitments from oil revenues and potential inclusion in the NPAS Trust of new CCAs would mean a more sustainable structure for IPLC led contributions to GEBs and less reliance on support from multilateral/bi-lateral and foundation resources

## C) IPLC-led conservation that advances national and global environmental priorities.

### 9. Does the EoI build on and contribute to national priorities as defined in NBSAPs and/or NDCs?

*Scoring:*

- Contributions not provided;
- The project is weakly related to either national priorities;
- The project appears to be tangentially related to national priorities;
- The proposal reflects an understanding of the national policy priorities and clearly positions the project in relation to those priorities

*Reviewer A: 3/3 Reviewer B: 3/3*

**Average: 3/3**

*Evidence A:* Guyana is committed to increase its area under protection and mitigate its emissions coming from mining by this increase. This project is well aligned with that goal

*Evidence B:* See Question B.6 A total of 4.7 MHa is indicated in GEF7 Indicators 1 and 3 as areas under improved management and or practice in the EoI. Indicator 11 indicates 20,000 beneficiaries. GEF7 Indicator 1 includes the 2.7MHa represents the two proposed areas under the EoI. The current land under protection within Guyana's National PA System is 8.5% of Guyana's land area-approximately 1.8 MHa. If proposed areas were to be included within the PA system, it would more than double the area under protection and enable Guyana to meet its commitments under Aichi 11 and its NBSAP. Precedent for inclusion of titled IP lands in the NPAS includes the 625Kha Kanoshen Community Conserved area, so potential is significant for achieving contributions to GEF7 Core Indicators.

#### D) Demonstrated gender mainstreaming in all activities.

10. Does the EoI provide a clear and robust approach to gender mainstreaming?

*Scoring:*

- Gender mainstreaming approach is absent;
- Gender mainstreaming approach is weak;
- Gender mainstreaming approach is moderately thought through (if there are a few activities as 'add ons');
- Significant and well-thought through approach to gender mainstreaming

*Reviewer A: 2/3 Reviewer B: 3/3*

**Average: 2.5/3**

*Evidence A:* the organisation seems to have experience with gender mainstreaming but probably needs further thought.

*Evidence B:* Gender mainstreaming practice in current governance and activities is clearly defined and evidences an understanding of issues. This should be specifically defined for project activities within a full proposal.

#### E) Innovation and potential to scale up.

11. Do the proposed activities and results demonstrate innovation and potential for transformative results at scale?

*Scoring:*

- None demonstrated;
- Low demonstrated potential;
- Moderate demonstrated potential;
- Medium-high demonstrated potential;
- High demonstrated potential;
- Exceptional demonstrated potential

*Reviewer A: 2/5 Reviewer B: 5/5*

**Average: 3.5/5**

*Evidence A:* The innovative nature of the project seems to be limited in its focus on conservation management plans and monitoring teams.

*Evidence B:* There is strong potential for replicability of model to other regions in Guyana. APA has strong national reach and connections to regional and national IPOs. See also question 2.B.6

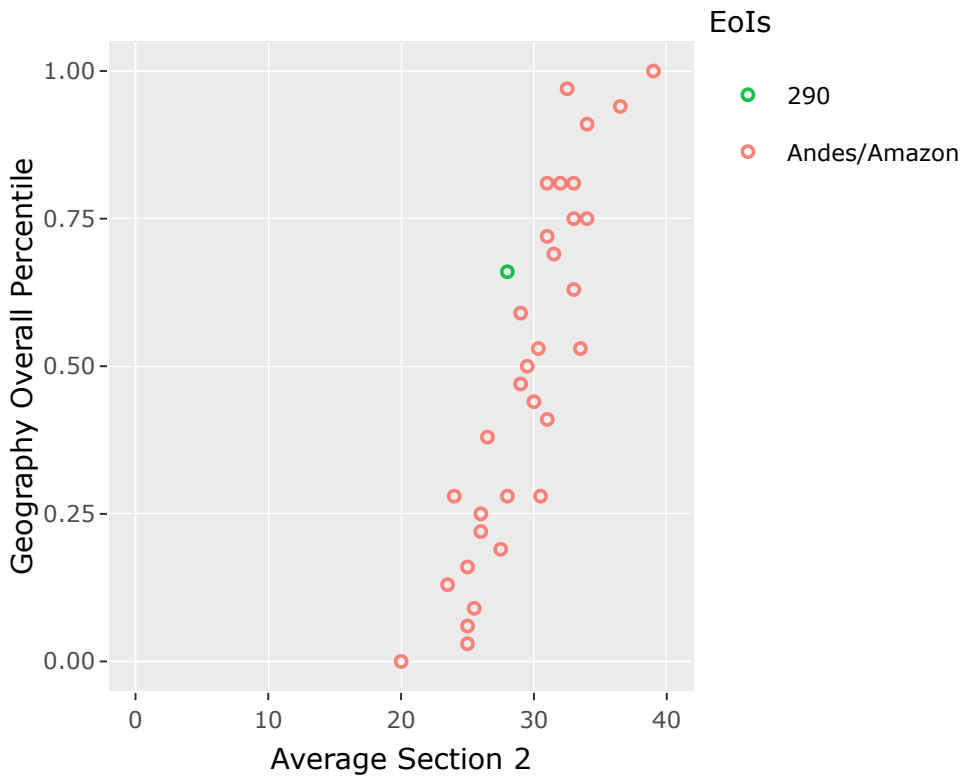
Section 2:

Reviewer A Total Score: 23/40

Reviewer B Total Score: 33/40

Average Total Score: 28/40

Performance of Eol 290 in Andes/Amazon - Percentile by Average Score (Section 2)



## Section 3 - Qualifications and experience of the Organization (Total Points: 30)

### A) Indigenous Peoples or Local Community organization legally recognized under national laws.

#### 1. Is the EoI led by an IPLC organization?

Scoring:

- IPLC appear to be beneficiaries only;
- Combination/partnership of IPLC organizations and NGOs, and plans to build IPLC capacity over the project term are clear;
- IPLC-led approach, NGOs in more limited, defined roles (such as fiduciary);
- Fully IPLC composed and led approach

*Reviewer A: 6/6 Reviewer B: 4/6*

**Average: 5/6**

*Evidence A:* All the organisations and IPLC.

*Evidence B:* The EoI is led by the Amerindian Peoples Association, an IP organization with an extensive track record of working with national IPOs and with experience in project design and implementation. The two main partners in the design of the EoI are the South Rupununi and the North Pakaraimas District Councils. The SRDC and NPDC include 39 member communities. Per the EoI Part 3, Q.21: "District Councils are provided for in the Amerindian Act as an intermediate form of indigenous government that exists in parallel to the Regional Democratic Councils in each of Guyana's administrative regions. They operate at an ideal scale: they are representative, they are big enough to deal with issues that impact multiple villages, big enough to maintain and support professional resource personnel (GIS managers, coordinators, finance staff) but small enough to act quickly on emerging threats or opportunities. Strengthening these institutions is key to not only improved forest governance, but to controlling and guiding sustainable development efforts over the long term."

### B) Demonstrated on the ground leadership related to Indigenous Peoples and/or Local Community Conservation.

#### 2. Does the lead proponent demonstrate on-ground leadership relevant to the proposed work?

Scoring:

- None demonstrated;
- Limited demonstration of relevant on-ground leadership;
- Demonstrated on-ground leadership relevant to the proposed work;
- Exceptional and long-standing on-ground leadership relevant to the proposed work

*Reviewer A: 6/6 Reviewer B: 6/6*

**Average: 6/6**

*Evidence A:* A long trajectory is described.

*Evidence B:* The EoI is led by the Amerindian Peoples Association, an IP organization established for 27 years with an extensive track record of working with national IPOs, Regional and International IPOs and INGOs, and with experience in project design and implementation related to advocacy for IPLC rights and conservation. The two implementing partner organizations are local IPOs. The SRDC is gazetted by the GoG and composed of 18 member communities and has designed and implemented numerous projects. The newer NPDC is applying for legal status as a district council (some information on the NPDC was omitted in Q.20).

C) Proven relevant experience in working with IPLC networks, alliances and organizations/ strength of partnerships on the ground.

3. Does EoI demonstrate that the lead proponent has strong partnerships, particularly with other IPLC organizations, to carry out the work?

Scoring:

- No partners defined;
- No IPLC partners identified;
- IPLC organizations are listed as implementing partners but without clear scope (roles in project design or governance);
- IPLC organizations are listed as implementing partners with clear roles (in project design or governance);
- Strong IPLC partnerships that play a central role in design, governance, and implementation of the project;
- Strong IPLC partnerships have a central role in design, governance and implementation of the project and linkages with national or regional IPO networks

*Reviewer A: 5/5 Reviewer B: 5/5*

**Average: 5/5**

*Evidence A:* Long history of working with other IPLCs

*Evidence B:* See Sec.3.A.1 and B.2. The APA has strong linkages to IPOs at national, regional and international levels.

D) Technical expertise and capacity to address environmental problems, root causes and barriers.

4. Does EoI demonstrate technical capacity of lead proponent and partners to deliver the proposed results?

Scoring:

- No skills demonstrated;
- The skills and experiences outlined have little or no relation to the project activities;
- There is some lack of clarity or some gaps in the capacities necessary to implement the project;
- The activities clearly show how they plan to fill capacity gaps over the course of the project;
- They seem to have adequate skills and capacity for the project but do not have experience with GEF projects;
- The lead organization and project partners clearly communicate that they have all the skills and experience necessary to implement the project activities. Also, have past experience with GEF funded projects.

*Reviewer A: 5/5 Reviewer B: 4/5*

**Average: 4.5/5**

*Evidence A:* Long history of experience with similar projects

*Evidence B:* While the lead IPO has no experience with GEF project, they do have experience with Bilateral (NORAD) IUCN funding and private foundations, with multi year commitments. They also have extensive experience in conservation action. The Rainforest Foundation US will serve as technical support partner for management planning, mapping, organizational strengthening and advocacy strategy. Response would be stronger with specific details on expertise within APA.



## E) Project Management capacity.

5. Does the EoI demonstrate project & financial management capacity needed for scale of proposed effort?

*Scoring:*

- Very limited (no criteria met);
- Some capacity but would require support (1/3 criteria);
- Moderate capacity (2/3 criteria met);
- Very strong (all criteria met) with demonstrated past performance

*Reviewer A: 6/6 Reviewer B: 6/6*

**Average: 6/6**

*Evidence A:* Long history of experience with similar projects

*Evidence B:* Partnership with Rainforest US provides technical and financial management support.

6. Does lead organization have experience with safeguards and other standards required by GEF?

*Scoring:*

- Answered no;
- Answered yes but with weak or lacking explanation to the extent;
- Answered yes with clear explanation of the extent

*Reviewer A: NA/2 Reviewer B: 2/2*

**Average: 2/2**

*Evidence A:* yes with clear explanation provided

*Evidence B:* Additional detail may be required for a full proposal.

Section 3:

Reviewer A Total Score: 28/30

Reviewer B Total Score: 27/30

Average Total Score: 27.5/30

Performance of Eol 290 in Andes/Amazon - Percentile by Average Score (Section 3)

