



ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

Third Regional Development Project

February 10, 2015

1. Preface

The present Environmental and Social Management Framework (ESMF) is an integral part of the Operations Manual of the Municipal Development Fund of Georgia (MDF) prepared for the purposes of implementing the World Bank-supported Third Regional Development Project (RDP III). The ESMF identifies a range of required environmental and social management measures that need to be taken during the planning, design, and construction and operation phases of RDP III, in order to ensure compliance with the national legislation and the World Bank's safeguard policies.

This ESMF provides general policies, guidelines, codes of practice and procedures to be integrated into the implementation of the Project. It lays out steps-by-step instructions for environmental screening, classifying, appraising, approving and monitoring individual subprojects under RDP III. The ESMF also overviews environmental and social policies and legal framework of Georgia and safeguard policies of the World Bank; includes institutional and capacity assessment related to environmental and social risk management; and describes the principles, objectives and approach to be followed while designing site-specific environmental mitigation measures.

2. Project Context

Following four years (2008-2012) of rapid growth, backed by far-reaching reforms and strong financial investment inflows, Georgia experienced a sharp economic downturn resulting from the August 2008 conflict and the global financial crisis. The authorities responded to the downturn with a countercyclical fiscal stimulus coupled with a marked reallocation of public expenditures toward social and infrastructure investments. As economic recovery takes hold, driven by higher exports and private investment, the authorities are winding down the stimulus and implementing fiscal adjustment to safeguard sustainability.

As part of its economic recovery efforts, the Government has launched several initiatives to attract private investors in selected regions (Tbilisi, Adjara, Imereti, Kakheti). Tourism has been identified as a source of growth, and Georgia has not yet fully tapped its potential to promote sustainable tourism in promising regions, such as Mtskheta-Mtianeti and Samtskhe-Javakheti, or transform the economy through investment in tourism and agriculture supply chains for both export and import substitution. There is also a need for skills development in order to provide the skilled labor needed for a growing economy and increased productivity.

The Government of Georgia has asked the World Bank to support regional development by applying a vertical programmatic approach. The proposed program of interventions will emphasize tourism and agro-processing as two key pillars and drivers of economic growth. Two similar projects are currently being led by the MDF in Imereti and Kakheti regions.

3. Development Objective, Expected Results, and Design of the Regional Development Project III

A. Proposed Development Objective

The Project Development Objective is to improve infrastructure services and institutional capacity to support the development of tourism-based economy and cultural heritage circuits in the Samtskhe-Javakheti and Mtskheta-Mtianeti regions.

Result indicators include:

Infrastructure Services:

- Increased hours per day of piped water delivery in project areas
- Improved access roads to selected tourism attraction sites.

Tourism Economy:

- Increased volume of private sector investments in targeted areas.
- Increased hotel beds in circuit areas

Institutional Capacity:

- Increased tourism points of sales (tourism related enterprises, e.g., total number of museums, sites improved, hotels, family and guest houses, restaurants, site ticket offices, etc.)
- Establishment of two regional destination management offices for sustainability

The proposed sites/subprojects considered for financing under the Project can be grouped into two categories:

- Urban regeneration in the cities of Dusheti, Kazbegi and Abastumani as well as small-scale incremental investments in Mtskheta, Gudauri, Bakuriani, Borjomi and Akhalsekhi. Additional investments in Akhalkalaki, Ninosminda and Khevsureti may also be financed.
- Improved site management and construction of tourism facilities and access roads for nine cultural heritage sites: Saphara Monastery, Saro Church and Darbazi houses, Zarzma Monastery, Vani Caves, Khertvisi Fortress, Akhalkalaki Castle, Ananuri Fortress, Gergeti Trinity Church and Shatili.

B. Project Design

RDP III comprises of two components:

Component 1: Infrastructure Investment (US\$55 million, IBM)

Component 1.1: Urban Regeneration and Circuit Development (US\$45 million). This component will finance: urban regeneration, including old towns and villages (under screening and selection), restoration of building facades, public spaces, museums, roads and water, and enhancement of cultural and natural heritage sites, including access and presentation. Based on product development and marketing potential, infrastructure needs, and employment levels, the Project will focus on sites along the circuit connecting the selected heritage, nature and ski sites.

Component 1.2: Provision of Public Infrastructure to Attract Private Investments (US\$10 million). To encourage private sector investments in the region, this component is to support a selected number of private sector entities in project areas which show interest and capacity to

invest in tourism or agribusiness, seeking complementary public infrastructure necessary to make their investments viable (e.g., public facilities within vicinity of the investments, road/sidewalk, water/sanitation, communications, connection to main circuit route etc.).

Component 2: Institutional Development (US\$5 million, IBRD)

Institutional capacity and performance of the Georgia National Tourism Administration (GNTA), Agency for Culture Heritage Preservation of Georgia (ACHP), National Museum, MDF and other local and regional entities to carry out the following activities: destination management and promotion, including local outreach campaign; marketing and promotion; skilled workforce development and capacity building; feasibility studies, design, construction supervision and sustainable site management of cultural heritage; and performance monitoring & evaluation activities.

Total Project Cost

The Government of Georgia has requested the financing of \$60 million from the World Bank for implementing RDP III. The total Project cost is \$ 75 million and includes \$15 million funding from the Government of Georgia. The Project will be implemented by the MDF.

4. Institutional and Legal Framework

4.1 Institutional Framework

This section outlines the implementation arrangements of RDP III. Section provides guiding principles for implementers and partners.

Municipal Development Fund of Georgia

The MDF is the Implementing Agency for the Project and will be responsible for all aspects of its day-to-day management, including its adherence to the present ESMF. Environmental and social governance under RDP III will be exercised by the MDF through its Environment and Resettlement Safeguards Unit.

The Environmental and Resettlement Safeguards Unit comprises the following staff units: Head of the Unit, three (3) Environmental Specialists, two (2) Resettlement Specialists, one (1) Social&Gender Specialist and one (1) Safety Specialist.

The responsibilities of the Head of Safeguards Unit are the following:

- Lead the implementation of environmental policies and practices;
- Ensure compliance with IFIs' environmental policies and the national environmental legislation;
- Control quality and adequacy of environmental and social screening reports to ensure that no subproject is accepted for further processing if it falls under environmental category A and/or if it may adversely change the quality or quantity of water in the international waterways, or be affected by the other riparians' possible water use;
- Participate in the screening of public-private investment proposals to ensure that selected ones fully meet environmental and social eligibility criteria;
- Review and ensure quality of Subproject Appraisal Reports (SARs), Environmental and Social Review (ESR) reports, Environmental Management Plans (EMPs), and Resettlement Action Plans (RAPs) produced by the MDF staff;

- Ensure due involvement of the Safeguards Unit staff into all operations of MDF that require inputs related to safeguard policy application;
- Evaluate environmental performance under the MDF-implemented activities and ensuring quality of reporting on the application of safeguard policies to internal and external clients and regulatory bodies;
- Alert the MDF management on significant issues revealed through monitoring of safeguards performance of contractors and recommending remedial action;
- Ensure disclosure of safeguards documents according to the guiding principles set forth in ESMF and Resettlement Policy Framework (RPF); coordinate consultation with stakeholders on ESRs, EMPs, RAPs, and any environmental and social aspects of the MDF's activities that affected people may be interested in; and take decision on the incorporation of public feedback into safeguards documents.

One environmental specialist is fully involved in the process of preparation, implementation and monitoring of all subprojects under RDP III with the following responsibilities:

- Undertake environmental screening and classification of proposed subprojects and defining their eligibility for funding under RDP III from environmental and social standpoints;
- Draft EMPs and submitting to the Head of Safeguards Unit for review and submission to the World Bank;
- Provide safeguards-related write-ups for the inclusion into SARs;
- Prepare draft EMPs for disclosure and drafting public announcements on the conduct of stakeholder consultation meetings in cooperation with the Resettlement Specialist;
- Participate in stakeholder consultation meetings on EMPs, drafting minutes of consultations, taking photos, and obtaining contact information and signatures of participants;
- Conduct environmental monitoring of subprojects and documenting outcomes of monitoring by filling out field monitoring checklists and creating photo documentation;
- Provide write-ups with the analysis of environmental performance to the Head of Safeguards Unit for the purpose of including into the general progress reporting.

One Resettlement Specialist is fully involved in the process of preparation, implementation and monitoring of all subprojects under RDP III with the following responsibilities:

- Design and supervise the execution of needed impacts assessments, affected persons (AP) censuses and socio-economic surveys;
- Supervise the impacts valuation survey;
- Establish a public information and consultation program and supervise its execution;
- Establish a Complaints and Grievances mechanism and monitor its activities;
- Work with the relevant government institutions to assess the legal status of the properties affected, legalize legalizable APs and prepare compensation protocols and contracts;
- Write the needed RAPs and communicate with World Bank during the RAP review process and attend the reviews process;
- Communicate with the World Bank in the process of submission and Bank/Government approval of RAPs for each subproject;
- Monitor the redress progress with eventual complaint and grievances cases and if required, provide inputs for their final resolution;

- Monitor the execution of rehabilitation tasks, the delivery of compensation, temporary or permanent relocation process and ensure that civil works do not start before rehabilitation/compensation is delivered to the APs;
- Plan and monitor the preparation of compliance reports by an independent monitoring agency. Communicate with WB and assist during the report review and revision process;
- Monitor the pending complaints, litigation or other matters in respect of post-RAP implementation, if any.

One Gender specialist will be involved in the process of preparation, implementation and monitoring of all subprojects under RDP III with the following responsibilities:

- Ensure that adequate attention is paid to gender in conducting all surveys and collection and analysis of demographic, physical, economic, and financial data to attain this objective;
- Ensure that gender-disaggregated analysis is conducted on all of the following aspects in preparing the sector plans;
- Conduct on-the-job site inspections and furnish periodic progress reports about implementation;
- Report on the participation of men and women and recommend opportunities for them to participate in the planning and implementation phases of subprojects.

Supervision Consultants

The MDF may amplify in-house institutional capacity for environmental and social governance of its activities by hiring safeguards supervision consultants or including safeguards monitoring function into the contracts of construction supervision consultants hired with a broader mandate. Such consultants may perform their functions during entire lifetime of RDP III or during specific time periods of its implementation. Responsibilities of safeguards supervision consultants would include, but may not limited to the following:

- Provide field environmental and social monitoring of works under active subprojects of RDP III;
- Fill out field environmental and social monitoring checklists and creating photo documentation;
- Urgently flag cases of significant non-compliance with EMP to the employer and suggest remedial actions;
- Provide monthly reports on environmental performance of contractors to the employer containing analytical write-up on the encountered issues, recommended actions, and status of addressing previously revealed non-compliances;
- Lead professional dialogue with the Environmental Specialist of the MDF and the Head of Safeguards Unit to share information from the field, discuss issues and recommended remedial actions, as well as notify the employer on any safeguards-related issues that are not addressed through EMPs but have emerged in the process of subproject implementation.
- Monitor that activities recommended by the Land Acquisition and Resettlement Unit (LAR) are addressed during sub-project implementation.

Construction Contractor

Construction Contractor will be responsible for full adherence to EMPs which will be attached to works contracts and be binding for them. Contractor's responsibilities include liaison with subproject-affected local communities that includes, but may not be confined to:

- Ensure work site safety for staff and preventing external access to work site in order to ensure public safety and prevent accidents;
- Post construction company's name and contact information near the work sites notifying local communities about duration and general type of works to be undertaken
- Alert local communities ahead of time about cut-offs of utility services caused by subproject works, indicating timing and duration of such cut-offs;
- Inform employer on issues raised by local communities if they cannot be resolved on-site by Contractor.

Also, Construction Contractor will be responsible for immediate suspension of all activities on site in case of encountering chance finds and prompt notification of the employer on such finds. Contractor will be forbidden to take any further action until receipt of written communication from the employer.

Other Central Government Agencies

Ministry of Environment and Natural Resources Protection of Georgia (MoENRP). MoENRP has the overall responsibility for protection of environment in Georgia. The Department of Permits of MoENRP will review Environmental Impact Assessment reports for those activities under RDP III which may require environmental permitting according to the Georgian legislation and will issue such permits as part of construction permits for the planned works. MoENRP is mandated to undertake control over the compliance of construction works with the terms and conditions of the issued permits.

The **Ministry of Economic Development** will review design documentation of subprojects that may require construction permitting and issue such permits. Having environmental permits from MoENRP is mandatory for the issuance of a construction permit.

The **Ministry of Culture and Monument Protection of Georgia** will provide its formal consent to the issuance of a construction permit for subprojects requiring it in case construction is to be carried out in historic sites or zones of cultural heritage. If Construction Contractor encounters chance finds on a subproject site, MDF must notify the Ministry of Culture and Monument Protection and receive its instructions on the further course of action. MDF may not authorize resumption of work until obtaining consent of the Ministry of Culture and Monument Protection confirming that all urgent measures are taken for the preservation of archaeological heritage.

4.2 Regulatory Framework

Georgian Legislation

RDP III must be implemented in full compliance with the national legislation, including laws, regulations, and standards governing environmental management, social protection, and preservation of cultural heritage of the country. The legal, legislative and institutional framework for health and environment in Georgia is founded on the Constitution of Georgia, which

stipulates the right to a healthy environment and the duty of all, in line with the law, to protect and enhance the environment. Health and environment is also supported by many governmental strategies and international agreements.

The following national legal acts are relevant for RDP III:

- Soil Protection; Law of Georgia on Soil Protection (1994);
- System of Protected Areas (1996);
- Minerals (1996)
- Environmental Protection (1996);
- 1996 – Wildlife (1996)
- Tourism and Resorts (1997);
- Water Protection (1997);
- Transit and Import of Hazardous Waste within and into the Territory of Georgia; (1995)
- Resorts and Sanitary Protection of the Resort Zones (1998);
- Pesticides and Agrochemicals (1998);
- Atmospheric Air Protection (1999);
- Forest Code (1999);
- Red List and Red Book of Georgia (2003);
- Licensing and Permitting (2005);
- Environmental Impact Permit (2007);
- Ecological Expertise (2007);
- Cultural Heritage (2007).
- Waste Management Code (2014)

Environmental permitting procedure in Georgia is set out in three laws: (i) The Law on Licenses and Permits (2005); (ii) The Law on Environmental Impact Permits, and (iii) The Law on Ecological Examination 2008. In line with the mentioned laws, a provision “On the environmental Impact Assessment” is provided by Decree No. 31 of May 15, 2013 of the Minister of Environment and Natural Resources Protection and regulates the legal relations associated with the assessment of environmental impacts. The Law on Licenses and Permits is relevant for the purposes of implementing RDP III not only because some of the Project-financed activities may require environmental permitting, but also because borrowing for the construction material that is likely to be required for implementing works under RDP III is subject to issuance of a resource user license.

World Bank Safeguard Policies

As far as the World Bank provides core financing for a project implementation, the safeguard policies of the World Bank apply. RDP III is classified as environmental Category B, which means that only category B or C activities may be financed from its proceeds. Category A subprojects are not eligible. It is expected that category B subprojects may carry relatively higher or lower risks, and in order to optimize environmental due diligence to be applied to subprojects, MDF will mark subprojects as “high” B (B+) or “low” B (B-).

RDP III triggers the following safeguard policies of the World Bank:

1. **OP/BP 4.01 Environmental Assessment.** The Bank requires Environmental Assessment (EA) of projects proposed for Bank support to ensure that they do not have, or mitigate potential negative environmental impacts. The EA is a process whose breadth, depth, and type

of analysis depend on the nature, scale, and potential environmental impact of the proposed project. The EA evaluates a project's potential environmental risks and impacts in its area of influence; examines project alternatives; identifies ways of improving project selection, siting, planning, design, and implementation by preventing, minimizing, mitigating, or compensating for adverse environmental impacts and enhancing positive impacts; and includes the process of mitigating and managing adverse environmental impacts throughout project implementation. The EA takes into account the natural environment (air, water and land); human health and safety; social aspects; and transboundary and global environmental aspects. The Borrower is responsible for carrying out the EA and the Bank advises the Borrower on the Bank's EA requirements.

2. **OP/BP 4.11 Physical Cultural Resources.** Physical cultural resources are defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Their cultural value may be of the local, provincial or national level, or be recognized by the international community. Physical cultural resources are important as sources of valuable scientific and historical information, as assets for economic and social development, and as integral parts of a people's cultural identity and practices. The Bank assists countries to avoid or mitigate adverse impacts on physical cultural resources from development projects that it finances. The borrower addresses impacts on physical cultural resources in projects proposed for Bank financing, as an integral part of the environmental assessment (EA) process. When the project is likely to have adverse impacts on physical cultural resources, the borrower identifies appropriate measures for avoiding or mitigating these impacts as part of the EA process. These measures may range from full site protection to selective mitigation, including salvage and documentation, in cases where a portion or all of the physical cultural resources may be lost.
3. **OP/BP 4.12 Involuntary Resettlement.** This Policy is based on assisting the displaced persons in their efforts to improve or at least restore their standards of living. The impetus of this Policy is that development undertakings should not cause the impoverishment of the people who are within the area of influence of the undertakings. In cases where resettlement of people is inevitable, or in cases where loss of assets and impacts on the livelihood of the project affected people is experienced, a proper action plan should be undertaken to at least restore, as stated above, their standard of life prior to the undertakings. RPF developed for RDP III as a stand-alone document and it provides all required instructions for the MDF on the application of the OP/BP 4.12.separate document
4. **OP/BP 4.20 Gender and Development.** The objective of the Bank's gender and development policy is to assist member countries to reduce poverty and enhance economic growth, human well-being, and development effectiveness by addressing the gender disparities and inequalities that are barriers to development, and by assisting member countries in formulating and implementing their gender and development goals.
5. **OP/BP 7.50 Projects on International Waterways.** International waterways are defined as any river, canal, lake, or similar body of water that forms a boundary between, or any river of body of surface water that flows through, two or more states; any tributary or other body of surface water that is a component of any waterway described above; and any bay, gulf, strait, or channel bounded by two or more states, or if within one state, recognized as a necessary channel of communication between the open sea and other states, and any river flowing into such waters. This policy applies to projects that involve the use or potential pollution of international waterways and requires that riparian states are notified about the project. This

requirement may be lifted on exceptional basis if according to the World Bank's judgement a project will not (i) adversely change the quality or quantity of water flows to the other riparians, and be adversely affected by the other riparians' possible water use.

The World Bank operational policies also require that all investment designs reflect results of public participation and integrate governmental interests along with those of private businesses and civil society. In this spirit, the MDF will ensure that the preparation of ESR report and/or EMPs for subprojects includes consultation with affected parties and public disclosure of the associated documents.

Gaps between Georgian legislation and the World Bank requirements

The following gaps/differences between the World Bank guidelines and the Georgian national environmental and social legislation are relevant to the proposed RDP III:

- Screening and Classification: The World Bank's guidelines provide detailed description of procedures for screening, scoping and conducting of environmental assessment, while screening and scoping stages are not envisaged under the Georgian national legislation.
- Considering ecological risk, cultural heritage, resettlement and other factors, the World Bank classifies projects supported by them under categories A, B and C. According to the Georgian legislation, EIA is carried out only if a developer seeks to implement projects listed in the Law on Environmental Permit. This list is close to types of activities which fall under environmental Category A as defined by the World Bank's OP/BP 4.01. According to the Georgian legislation, EIA is not required for any other types of activities, including plenty of those that pass under environmental Category B according to the World Bank policy.
- The Georgian legislation does not specify format of EMPs and stage of their provision for the projects subject to EIA, and does not request EMPs for the projects not requiring EIA. The World Bank guidelines require EMPs for Category A and B projects and provide detailed instructions on the content.
- Overall, the legislation of Georgia adequately reflects the major provisions of the World Bank resettlement safeguard (WB OP 4.12), but a few differences are to be noted. The most significant of these differences is that under Georgian legislation/regulation, emphasis is put on the definition of formal property rights and on how the acquisition of properties for public purposes is to be implemented and compensated while in the case of OP 4.12 emphasis is put both on the compensation of rightfully owned affected assets and on the general rehabilitation of the livelihood of Affected People (AP) and Affected Households (AH). Because of this, World Bank safeguard policy on Involuntary Resettlement complements the Georgian legislation/regulation with additional requirements related to (i) the economic rehabilitation of all AP/AF (including those who do not have legal/formal rights on assets acquired by a project); (ii) the provision of indemnities for loss of business and income, (iii) and the provision of special allowances covering AP/AH expenses during the resettlement process or covering the special needs of severely affected or vulnerable AP/AHs. Also, in addition, the legislation of Georgia does not require any specific measure regarding the need to prepare RAPs based on extensive public consultations.

- While according to the World Bank policy, the Borrower has overall responsibility to ensure that due disclosure and public consultation on safeguard documents takes place the national legislation defers this responsibility to a project proponent.

Due to these gaps and differences, implementation of RDP III must comply with both – the national legislation and the World Bank policies. If the two differ on a particular aspect, the more stringent requirement must be applied.

5. Summary of the bio-physical environment and socio-economic baseline of project-affected people in the project area

Samtskhe-Javakheti

Samtskhe-Javakheti region stretches over 6413 km² and has a population of 208,000. The region includes six large municipalities and its administrative center is Akhaltsikhe. Main urban areas are Akhalkalaki, Akhaltsikhe, Borjomi, Vale, and Ninotsminda. 69% of the population is rural. There are around 2300 IDPs, vast majority of those are from 1992-93 conflict. Ethnicity is an important consideration in Samtskhe-Javakheti. Ethnic minorities comprise 57% (population census, 2002) of the population of Samtskhe-Javakheti, with vast majority - 54% - of ethnic Armenians. Many females do not know Georgian, which makes it difficult for them to communicate with those outside their ethnic community, to provide feedback to local institutions, participate in meetings, or to access the labor market.

Samtskhe-Javakheti is a strictly agrarian region where the share of agriculture in total value added is largest (32%). Most of the human resources are employed in agriculture. The share of agriculture in the region's total value added in 2006-2011 was approximately 33%, higher than the same figure in other industries of the region and other regions of Georgia.

The region's agriculture is made up of family farms and commercial farms. 73% of family farms produce agricultural products for own use, while for others - agriculture is a source of income. The level of commercialization of agriculture in the Samtskhe-Javakheti region is higher than in any other regional of the country. More than half of agricultural land is used for pastures. Second largest area used for agriculture is arable land. Productivity in both – animal farming and crop growing is pretty low. There are no major industrial facilities in the region. Mining for construction materials and timber extraction are significant branches of economic activity. Construction of a new 500/400/200 kWh electric substation and high voltage transmission lines have been completed recently that will facilitate Georgia's power exports to Turkey. Baku-Tbilisi-Ceyhan oil pipeline passes through Samtskhe-Javakheti since 2006. A gas pipeline connecting the same destinations lies in the same transport corridor.

Samtskhe-Javakheti is home to several cultural heritage sites and nature attractions. The most significant sites are: Akhaltsikhe and Borjomi historical cities, Abastumani wellness resort town with its vernacular wooden architecture houses, and observatory Vardzia cave monastery and Vanis Kvabebi, Akhaltsikhe Fortress Rabati, Romanov palace in Likani, Sapara monastery, Zarzma monastery, Khertvisi fortress, Phoka monastery, and Atskuri temple ruins and fortress. The main nature attractions are: Bakuriani ski resort city, Borjomi-Kharagauli National Park, Javakheti National Park, six lakes and protected areas around them, and a world known bird-watching area with preserved plains and wildlife.

Mtskheta-Mtianeti

Mtskheta-Mtianeti region has an extension of 6.785 km² and a population of 125,000. The region includes four large municipalities and its administrative center is Mtskheta. The main urban areas are Mtskheta and Dusheti. Approximately 75% of the population resides in rural areas. Vast majority of population is ethnically Georgian. There are around 10,900 IDPs in the region most of which were displaced in the 2008 conflict.

Cattle and sheep farming and dairy production are the main branches of agriculture. Potato is a dominant crop cultivated. There are no large commercial farms in the region. Subsistence farming prevails. Mtskheta-Mtianeti is a major transport corridor, as an international automobile road passing through this region connects Armenia and Georgia with Russia and significant volumes of cargo are transported through this road. However landslides and avalanches block the road several times a year. A major North-South gas pipeline passes through this region too and is used for natural gas import from Russia to Georgia and Armenia.

Mtskheta-Mtianeti region is a major tourism destination with the UNESCO World Heritage Site of Mtskheta town and an exceptional portfolio of cultural heritage and natural products with a year round appeal for foreign and domestic visitors. The most significant sites are: Dusheti and Kazbegi historical towns with their vernacular architectural style, Svetitskhoveli church, Jvari temple, Shiomghvime monastery, archaeological sites of Bagineti-Armazi and Samtavro-Dzalisi; Zedazeni church, Bochorna church, Ananuri fortress, Gergeti Trinity church, Shatili and Mutso historic fortified cultural heritage villages, and Sno fortress. The main nature attractions are Gudauri ski resort and Tbilisi National Park.

6. Subproject Screening and Scoping

Design Consultant, Environmental Specialist, and Social Specialist jointly perform environmental and social screening of subproject proposals (*Attachments 1 and 2*). Screening reports provide information on the main risks and types of mitigation measures to be applied. Environmental screening report concludes by confirmation or denial of subproject eligibility from environmental standpoint and assigning of an environmental category to a sub-project. It also defines tools if environmental review and environmental management planning required for a subproject. Social screening report defines whether a subproject implies any form of involuntary resettlement, identifies a need for developing RAPs, points out main social benefits and losses of subproject and identifies measures for social mitigation.

Screening of subprojects suggested for financing under subcomponent 1.2 includes review of the investment initiatives from the private sector for which provision of public infrastructure is required under RDP III. Investment initiatives are screened by several criteria on the pass-or-fail basis (*Attachment 3*). The following type of investments are prohibited: investments in the designated protected areas; protection zones in general or individual protection zones of cultural heritage monuments; activities impacting fragile ecosystems, important habitats, and green-fields of outstanding aesthetic value; activities requiring conversion of forests, wetlands, and alpine/sub-alpine meadows; and heavily polluting industries. Also, subprojects under subcomponent 1.2 are not eligible for the support from RDP III if the private investment requires use of land which is being owned or used formally or informally by anybody other than the investor.

Eligible private investment proposals will be prioritized based on their expected economic prospects, positive social externalities, and environment-friendliness. Once an investment

proposal is selected for the provision of support in the form of financing matching public infrastructural elements from RDP III proceeds, environmental and social assessment and management planning for the required public works follows general rules as outlined below.

7. Environmental and Social Assessment and Management Planning

Based on the outcomes of environmental and social screening of subprojects, ESR will be undertaken for Category B+ subprojects with the purpose of identifying all technical details associated with general types of risks identified at the screening stage, adjusting generic set of mitigation measures suggested at the screening stage to the specific needs of a subproject implementation and producing environmental and social monitoring plans. Environmental and social management matrix, comprised of mitigation and monitoring tables, should identify estimated costs of key types of mitigation measures, parties responsible for application mitigation measures and for undertaking monitoring of EMP's implementation. It is essential that the table of mitigation measures names specific types of activities requiring mitigation, prescribes specific measures for mitigating risks associated with individual types of activities, and provides concrete measurable indicators against which the success of mitigation will be measured. EMPs must cover both – construction and operation phases of a subproject.

Environmental Management Checklist for Small Construction and Rehabilitation Activities (*Attachment 4*) is a tool for environmental management planning for Category B- subprojects. It is a template to be filled in with short information about the location of a subproject site, physical and natural environment around it, land ownership, legislation pertaining subproject implementation, and the specific types of activities required for a subproject implementation. The Checklist provides readily available generic set of mitigation measures applicable to various types of activities. Environmental monitoring plan has to be developed by MDF according to the above instructions.

8. Public Consultation and citizen engagement in social and environmental risk management

Participatory approach to framing environmental and social governance under RDP III as well as for planning of environmental and social impact mitigation is essential for ensuring quality and realism of safeguard documents. Present draft ESMF will be disclosed through MDF's web page and made available in print version at the two regional administrations in Georgian and English languages and a consultation on it will be undertaken with relevant government and non-government institutions, as well as with the professionals representing academia. Site-specific EMPs will also be disclosed in two languages on the MDF's web page, and hard copies in Georgian will be delivered to the administrative centers closest to the subproject sites. Local communities will be notified on the availability of these hard copies as well as on the means of communicating their feedback on EMPs. Public consultation meetings with subproject-affected people will be held in the vicinity of subproject sites selected to guarantee easy access of stakeholders.

Detailed record of public consultation process will be kept. Minutes of all meetings held will be produced including the following information:

- What announcement was made on the meeting, through what media, and on what date
- What was the time and venue of a meeting held

- How many attendees were in the meeting
- What was agenda of the meeting
- Who were key speakers and what aspects did they cover
- What were the main types of questions asked by local residents and how these questions were entertained

Minutes should be supported with photo material taken during consultation and lists of attendees with their contact information and original signatures.

Present ESMF as well as site-specific EMPs will be finalized with incorporation of adequate feedback and re-disclosed along with the minutes of consultation meetings attached.

Beneficiary consultations will continue during the construction phase by consultant contractors environmental specialist, and records of environmental and social issues raised and complaints received during consultations, field visits, informal discussions, formal letters, etc., will be followed up. The records will be kept in the project office in the MDF.

9. Environmental Monitoring

Environmental monitoring will be an integral part of the MDF's supervisory work in the course of the project implementation. The MDF will be responsible to ensure that on-site managers of works contractors are familiar with EMPs and instruct workers/personnel on the compliance with these EMPs. The MDF will demand from works contractors timely submission of environmental permits for the operation of asphalt/concrete plants (if owned); licenses for the extraction of rock, gravel, and sand (if operating quarries); and written agreements with local authorities on the disposal of waste. The MDF will conduct regular on-site monitoring of civil works to verify contractors' adherence to the requirements set out in EMPs, to identify any outstanding environmental issues or risks, and to ensure proper application of the prescribed remedial actions. In case of recorded non-compliance with EMPs, the MDF will instruct contractors on the corrective measures and closely monitor their further progress.

The MDF's in-house capacity to carry out the above described supervisory functions may be supplemented by a hired international construction supervision company. Oversight on the environmental, cultural, and social aspects of construction works will be an integral part of the terms of reference for such supervision company.

10. Grievances Redress Mechanism

During implementation of the subprojects, there might be several issues related to environmental hazards and disputes on entitlement processes may occur due to the Project activities. For example, intensive schedule of construction activities; inappropriate timing of construction vehicle flow; waste; noise and air pollution from construction activities; ecological disturbances, are some of the environmental issues that are likely to arise from the Project activities.

According to the existing legal and administrative system in Georgia, there are several entities responsible for addressing environmental complaints of population and interested parties. The administrative bodies directly responsible for environmental protection within the subprojects areas are MoENRP and municipalities administrations. The affected population and stakeholders

may send their grievances, related to the project-induced environmental impacts directly to the mentioned administrative bodies responsible for environmental protection.

A Grievance Redress mechanism will be set up for the Project to deal with both the environmental and social issues of the subprojects. The MDF as the Implementation Agency has overall responsibility for project implementation and environmental compliance. The MDF will facilitate the grievance resolution by implementing a project-specific Grievance Redress Process (GRP).

10.1 Formation of GRC

A Grievance Redress Committee (GRC) will be established in each Gamgeoba (village/community authority). The MDF representative shall coordinate the GRC formation. He/she will then be responsible for the coordination of GRC activities and organizing meetings. In addition, GRC shall comprise village Rtsmunebuli or his/her representative, representatives of PAPs, women PAPs (if any), and appropriate local NGOs to allow voices of the affected communities to be heard and ensure a participatory decision-making process.

GRCs will be established with provision of 6 members of following composition:

| | |
|--|--------------------|
| (i) Representative of MDF | : Convener |
| (ii) Representative Local Municipality | : Member Secretary |
| (iii) Gamgebeli – concerned Gamgeoba (village level) | : Member |
| (iv) Representative of PAPs | : Member |
| (v) Representative of Women PAPs | : Member |
| (vi) Environmental Specialist of Supervision Consultants | : Member |

On GRC level complaint will be reviewed on two stages.

At the 1 stage complaint will informally reviewed by the GRC, which takes all necessary measures to resolve the dispute amicably.

If the complainants are not satisfied with the GRC decisions, they can always use the procedures of Stage 2 of grievance resolution process.

If any aggrieved PAP is unsatisfied with the GRC decision, the next option will be to lodge grievances to the MDF at the national level. The MDF shall review the complaint in compliance with the procedures specified in the Administrative Code of Georgia.

If the MDF decision fails to satisfy the aggrieved PAPs, they can pursue further action by submitting their case to the appropriate court of law (Regional Court).

Submitted mechanism does not limit the right of PAP's to apply to the regional court directly if they wish.

10.2 Grievance Resolution Process

Stage 1 – The member secretary of GRCs and Municipality representative will be regularly available and accessible for PAPs to address concerns and grievances. The PAPs shall be informed of the details of contact persons to whom complaints were submitted. The Contractor,

Rtsmunebuli and Sakrebulo shall be warned that all complaints they may receive from PAPs shall be immediately submitted to the contact persons of MDF (coordinator and secretary), which will then organize a meeting and informally review the complaint with the aggrieved PAP. If the PAP is not satisfied, the GRC shall assist him/her in lodging an official complaint to the relevant body (i.e. MDF). Environmental and Safeguard Unit of MDF headquarters will keep record of complaints received for its use as well as for review by the WB during regular supervisions.

Grievance Resolution Process

| Steps | Action level | Process |
|--------|------------------------|--|
| Step 1 | Negotiations with PAPs | The complaint is informally reviewed by the GRC, which takes all necessary measures to resolve the dispute amicably. |
| Step 2 | GRC Resolution | <p>If the grievance is not solved during the negotiations, the GRC will assist the aggrieved PAPs to formally lodge the grievances to the GRC.</p> <p>The aggrieved PAPs shall submit their complaints to the GRC within 1 week after completion of the negotiations at the village level. The aggrieved PAP shall produce documents supporting his/her claim. The GRC member secretary will review the complaint and prepare a Case File for GRC hearing and resolution. A formal hearing will be held with the GRC at a date fixed by the GRC member secretary in consultation with Convenor and the aggrieved PAPs.</p> <p>On the date of hearing, the aggrieved PAP will appear before the GRC at the Gangeoba office for consideration of grievance. The member secretary will note down the statements of the complainant and document all details of the claim.</p> <p>The decisions from majority of the members will be considered final from the GRC at Stage 1 and will be issued by the Convenor and signed by other members of the GRC. The case record will be updated and the decision will be communicated to the complainant PAP.</p> |
| Step 3 | Decision from GSE | <p>If any aggrieved PAP is unsatisfied with the GRC decision, the next option will be to lodge grievances to the MDF at the national level. The MDF shall review the complaint in compliance with the procedures specified in the Administrative Code of Georgia.</p> <p>GRC should assist the plaintiff in lodging an official complaint (the plaintiff should be informed of his/her rights and obligations, rules and procedures of making a complaint, format of complaint, terms of complaint submission, etc).</p> <p>The plaintiff shall be informed of the decision.</p> |
| Step 4 | Court decision | <p>If the MDF decision fails to satisfy the aggrieved PAPs, they can pursue further action by submitting their case to the appropriate court of law (Regional Court).</p> <p>The aggrieved PAP can take a legal action not only about the amount of compensation but also any other issues, e.g.</p> |

| Steps | Action level | Process |
|-------|--------------|--|
| | | occupation of their land by the contractor without their consent, damage or loss of their property, restrictions on the use of land/assets, etc. |

11. Reporting

Documenting of environmental supervision of subprojects is mandatory. Monthly monitoring reports will be generated by filling out field monitoring checklists (*Attachment 5* to this ESMF), reflecting quality and extent of the application of each mitigation measure prescribed by ESMPs. Information provided in checklists should be supported with photo material taken on-site and dated.

Environmental chapters of quarterly progress reports on the project implementation shared with the World Bank will carry more comprehensive, analytical information on the status of environmental performance under the RDP III, including overview of deviations/violations of EMPs encountered over the report period, instructions given to the works contractors for addressing any weaknesses or identified issues, and follow-up actions on the revealed outstanding matters.

Social chapters of the quarterly progress reports will include a short description of the reasoning why projects did/did not trigger the application of the RPF, and the status of the application of different social safeguards provisions. Summaries of consultations, status of compensation to PAPs, status of livelihoods restoration activities and challenges in the implementation of RAPs will also be described. A list of projects expected to trigger the application of the RPF in the upcoming quarter will also be included.

Prompt notification of the World Bank on any accidents, emergencies, and unforeseen issues which may occur in the course of works and directly or indirectly affect environment, physical cultural resources, personnel of works providers, and or communities residing in the vicinity of a project site is mandatory regardless timelines of reporting. Unexpected negative social impacts identified during Project implementation will also be reported. The MDF's consultants and staff will be responsible for monitoring for such negative impacts during their supervision visits.

Attachment 1

Environmental Screening and Classification of Subprojects (Subcomponent 1.1)

(A) IMPACT IDENTIFICATION

| | |
|--|--|
| Has subproject a tangible impact on the environment? | |
| What are the significant beneficial and adverse environmental effects of subproject? | |
| May the subproject have any significant impact on the local communities and other affected people? | |

(B) MITIGATION MEASURES

| | |
|---|--|
| Were there any alternatives to the subproject design considered? | |
| What types of mitigation measures are proposed? | |
| What lessons from the previous similar subprojects have been incorporated into the project design? | |
| Have concerned communities been involved and how have their interests and knowledge been adequately taken into consideration in subproject preparation? | |

(D) CATEGORIZATION AND CONCLUSION

Conclusion of the environmental screening:

1. Subproject is declined
2. Subproject is accepted

Subproject preparation requires:

1. Completion of the Environmental Management Checklist For Small Construction and Rehabilitation Activities
2. Environmental Review, including development of Environmental Management Plan

***Social and Cultural Resource Screening
of Subprojects (subcomponent 1.1)***

| Social safeguards screening information | | Yes | No |
|--|--|------------|-----------|
| 1 | Is the information related to the affiliation, ownership and land use status of the subproject site available and verifiable? (The screening cannot be completed until this is available) | | |
| 2 | Will the project reduce other people’s access to their economic resources, such as land, pasture, water, public services or other resources that they depend on? | | |
| 3 | Will the project result in resettlement of individuals or families or require the acquisition of land (public or private, temporarily or permanently) for its development? | | |
| 4 | Will the project result in the temporary or permanent loss of crops, fruit trees and household infra-structure (such as ancillary facilities, fence, canal, granaries, outside toilets and kitchens, etc)? | | |
| If answer to any above question (except question 1) is “Yes”, then OP/BP 4.12 Involuntary Resettlement is applicable and mitigation measures should follow this OP/BP 4.12 and the Resettlement Policy Framework | | | |
| Cultural resources safeguard screening information | | Yes | No |
| 5 | Will the project require excavation near any historical, archaeological or cultural heritage site? | | |
| If answer to question 5 is “Yes”, then OP/BP 4.11 Physical Cultural Resources is applicable and possible chance finds must be handled in accordance with OP/BP and relevant procedures provided in the Environmental and Social Management Framework . | | | |

Eligibility Assessment of Public-Private Infrastructure Investments

| Indicator | Significant potential impact | Low potential impact |
|---|--|---|
| Type of Private Business | Industrial facility, power generation, natural resource extraction | Hospitality and tourist service, agro-processing, arts and crafts |
| | Check on of the two boxes below | |
| | | |
| Need for land take | Parties other than investor own and/or are formally or informally using land required for private investment | No party other than investor owns and/or uses formally or informally land required for private investment |
| | Check on of the two boxes below | |
| | | |
| Location in or near: | Designated protected areas and wildlife corridors connecting them, forests, wetlands, animal nesting/breeding areas, rest areas for migratory birds, steep slopes, alpine and subalpine zone, green-fields | Urban or rural landscapes transformed from the past anthropogenic impact, industrial sites, brown-fields |
| | Check on of the two boxes below | |
| | | |
| Use or potential pollution of: | Major rivers and river floodplains, trans-boundary water bodies and their tributaries, lakes, smaller water bodies which have high value for local communities or biodiversity | Small rivers and streams, artificial reservoirs and ponds insignificant for local communities and/or biodiversity |
| | Check on of the two boxes below | |
| | | |
| Groundwater resources in the investment site: | Deposits of mineral and/or thermal water; high groundwater table | No known deposits of mineral and/or thermal water; regular groundwater table |
| | Check on of the two boxes below | |
| | | |
| Location in: | Landscapes of outstanding aesthetic value, green-fields, recreational areas | Urban or rural landscapes transformed from past anthropogenic impact, industrial sites, brown-fields |
| | Check on of the two boxes below | |
| | | |
| Risk of natural disasters and geohazards | Severe erosion, landslides, avalanches, floods known to repeatedly occur in/around the site | No natural disasters and geohazards recorded repeatedly in or around the site |
| | Check on of the two boxes below | |
| | | |
| Investment site carrying: | Historic/cultural monuments, sites of communities' traditional use (religious, burial, ritual) | No cultural resources |
| | Check on of the two boxes below | |
| | | |

If any of the indicators is checks as “significant”, the private investment is not eligible for support with matching public infrastructure

***Environmental Management Checklist
for Small Construction and Rehabilitation Activities***

General Guidelines for use of EMP checklist:

For low-risk topologies, such as school and hospital rehabilitation activities, the ECA safeguards team developed an alternative to the current EMP format to provide an opportunity for a more streamlined approach to preparing EMPs for minor rehabilitation or small-scale works in building construction, in the health, education and public services sectors. The checklist-type format has been developed to provide “example good practices” and designed to be user friendly and compatible with safeguard requirements.

The EMP checklist-type format attempts to cover typical core mitigation approaches to civil works contracts with small, localized impacts. It is accepted that this format provides the key elements of an Environmental Management Plan (EMP) or Environmental Management Framework (EMF) to meet World Bank Environmental Assessment requirements under OP 4.01. The intention of this checklist is that it would be applicable as guidelines for the small works contractors and constitute an integral part of bidding documents for contractors carrying out small civil works under Bank-financed projects.

The checklist has three sections:

Part 1 includes a descriptive part that characterizes the project and specifies in terms the institutional and legislative aspects, the technical project content, the potential need for capacity building program and description of the public consultation process. This section could be up to two pages long. Attachments for additional information can be supplemented when needed.

Part 2 includes an environmental and social screening checklist, where activities and potential environmental issues can be checked in a simple Yes/No format. If any given activity/issue is triggered by checking “yes”, a reference is made to the appropriate section in the following table, which contains clearly formulated management and mitigation measures.

Part 3 represents the monitoring plan for activities during project construction and implementation. It retains the same format required for EMPs proposed under normal Bank requirements for Category B projects. It is the intent of this checklist that Part 2 and Part 3 be included into the bidding documents for contractors, priced during the bidding process and diligent implementation supervised during works execution.

CONTENTS

- A) General Project and Site Information**
- B) Safeguards Information**
- C) Mitigation Measures**
- D) Monitoring Plan**

PART A: GENERAL PROJECT AND SITE INFORMATION

| INSTITUTIONAL & ADMINISTRATIVE | | | |
|--|----------------------------------|------------------------------------|----------------------------|
| Country | | | |
| Subproject title | | | |
| Scope of site-specific activity | | | |
| Institutional arrangements (WB) | Task Team Leader: (insert) | Safeguards Specialist: (insert) | |
| Implementation arrangements (Borrower) | Implementing entity: (insert) | Works supervisor: (tbd) | Works contractor: (tbd) |
| SITE DESCRIPTION | | | |
| Name of institution whose premises are to be rehabilitated | | | |
| Address and site location of institution whose premises are to be rehabilitated | | | |
| Who owns the land? Who uses the land (formal/informal)? | | | |
| Description of physical and natural environment, and of the socio economic context around the site | | | |
| Locations and distance for material sourcing, especially aggregates, water, stones? | | | |
| LEGISLATION | | | |
| National & local legislation & permits that apply to project activity | | | |
| PUBLIC CONSULTATION | | | |
| When / where the public consultation process will take/took place | | | |
| ATTACHMENTS | | | |
| Attachment 1: Site plan / photo | | | |
| Attachment 2: Construction permit (as required) | | | |
| Attachment 3: Agreement for construction waste disposal | | | |
| Other permits/agreements – as required | | | |

PART B: SAFEGUARDS INFORMATION

| ENVIRONMENTAL /SOCIAL SCREENING | | | |
|--|--|--|----------------------------|
| | Activity/Issue | Status | Triggered Actions |
| Will the site activity include/involve any of the following? | A. Building rehabilitation | <input type="checkbox"/> Yes <input type="checkbox"/> No | See Section A below |
| | B. New construction | <input type="checkbox"/> Yes <input type="checkbox"/> No | See Section A below |
| | C. Individual wastewater treatment system | <input type="checkbox"/> Yes <input type="checkbox"/> No | See Section B below |
| | D. Historic building(s) and districts | <input type="checkbox"/> Yes <input type="checkbox"/> No | See Section C below |
| | E. Acquisition of land ¹ | <input type="checkbox"/> Yes <input type="checkbox"/> No | See Section D below |
| | F. Hazardous or toxic materials ² | <input type="checkbox"/> Yes <input type="checkbox"/> No | See Section E below |
| | G. Impacts on forests and/or protected areas | <input type="checkbox"/> Yes <input type="checkbox"/> No | See Section F below |
| | H. Handling / management of medical waste | <input type="checkbox"/> Yes <input type="checkbox"/> No | See Section G below |
| | I. Traffic and Pedestrian Safety | <input type="checkbox"/> Yes <input type="checkbox"/> No | See Section H below |

¹ Land acquisitions includes displacement of people, change of livelihood encroachment on private property this is to land that is purchased/transferred and affects people who are living and/or squatters and/or operate a business (kiosks) on land that is being acquired.

² Toxic / hazardous material includes but is not limited to asbestos, toxic paints, noxious solvents, removal of lead paint, etc.

PART C: MITIGATION MEASURES

| ACTIVITY | PARAMETER | MITIGATION MEASURES CHECKLIST |
|---|--------------------------------|--|
| 0. General Conditions | Notification and Worker Safety | <ul style="list-style-type: none"> (a) The local construction and environment inspectorates and communities have been notified of upcoming activities (b) The public has been notified of the works through appropriate notification in the media and/or at publicly accessible sites (including the site of the works) (c) All legally required permits have been acquired for construction and/or rehabilitation (d) The Contractor formally agrees that all work will be carried out in a safe and disciplined manner designed to minimize impacts on neighboring residents and environment. (e) Workers' PPE will comply with international good practice (always hardhats, as needed masks and safety glasses, harnesses and safety boots) (f) Appropriate signposting of the sites will inform workers of key rules and regulations to follow. |
| A. General Rehabilitation and /or Construction Activities | Air Quality | <ul style="list-style-type: none"> (a) During interior demolition debris-chutes shall be used above the first floor (b) Demolition debris shall be kept in controlled area and sprayed with water mist to reduce debris dust (c) During pneumatic drilling/wall destruction dust shall be suppressed by ongoing water spraying and/or installing dust screen enclosures at site (d) The surrounding environment (side walks, roads) shall be kept free of debris to minimize dust (e) There will be no open burning of construction / waste material at the site (f) There will be no excessive idling of construction vehicles at sites |
| | Noise | <ul style="list-style-type: none"> (a) Construction noise will be limited to restricted times agreed to in the permit (b) During operations the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential areas as possible |
| | Water Quality | <ul style="list-style-type: none"> (a) The site will establish appropriate erosion and sediment control measures such as e.g. hay bales and / or silt fences to prevent sediment from moving off site and causing excessive turbidity in nearby streams and rivers. |
| | Waste management | <ul style="list-style-type: none"> (a) Waste collection and disposal pathways and sites will be identified for all major waste types expected from demolition and construction activities. (b) Mineral construction and demolition wastes will be separated from general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers. (c) Construction waste will be collected and disposed properly by licensed collectors (d) The records of waste disposal will be maintained as proof for proper management as designed. (e) Whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos) |

| | | |
|---|------------------------------------|--|
| B. Individual wastewater treatment system | Water Quality | <ul style="list-style-type: none"> (a) The approach to handling sanitary wastes and wastewater from building sites (installation or reconstruction) must be approved by the local authorities (b) Before being discharged into receiving waters, effluents from individual wastewater systems must be treated in order to meet the minimal quality criteria set out by national guidelines on effluent quality and wastewater treatment (c) Monitoring of new wastewater systems (before/after) will be carried out (d) Construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface water bodies. |
| C. Historic building(s) | Cultural Heritage | <ul style="list-style-type: none"> (a) If the building is a designated historic structure, very close to such a structure, or located in a designated historic district, notification shall be made and approvals/permits be obtained from local authorities and all construction activities planned and carried out in line with local and national legislation. (b) It shall be ensured that provisions are put in place so that artifacts or other possible “chance finds” encountered in excavation or construction are noted and registered, responsible officials contacted, and works activities delayed or modified to account for such finds. |
| D. Acquisition of land | Land Acquisition Plan/Framework | <ul style="list-style-type: none"> (a) If expropriation of land was not expected but is required, or if loss of access to income of legal or illegal users of land was not expected but may occur, that the Bank’s Task Team Leader shall be immediately consulted. (b) The approved Land Acquisition Plan/Framework (if required by the project) will be implemented |
| E. Toxic Materials | Asbestos management | <ul style="list-style-type: none"> (a) If asbestos is located on the project site, it shall be marked clearly as hazardous material (b) When possible the asbestos will be appropriately contained and sealed to minimize exposure (c) The asbestos prior to removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust (d) Asbestos will be handled and disposed by skilled & experienced professionals (e) If asbestos material is being stored temporarily, the wastes should be securely enclosed inside closed containments and marked appropriately. Security measures will be taken against unauthorized removal from the site. (f) The removed asbestos will not be reused |
| | Toxic / hazardous waste management | <ul style="list-style-type: none"> (a) Temporarily storage on site of all hazardous or toxic substances will be in safe containers labeled with details of composition, properties and handling information (b) The containers of hazardous substances shall be placed in an leak-proof container to prevent spillage and leaching (c) The wastes shall be transported by specially licensed carriers and disposed in a licensed facility. (d) Paints with toxic ingredients or solvents or lead-based paints will not be used |
| F. Affected forests, wetlands and/or protected areas | Protection | <ul style="list-style-type: none"> (a) All recognized natural habitats, wetlands and protected areas in the immediate vicinity of the activity will not be damaged or exploited, all staff will be strictly prohibited from hunting, foraging, logging or other damaging activities. |

| | | |
|--|---|--|
| | | <p>(b) A survey and an inventory shall be made of large trees in the vicinity of the construction activity, large trees shall be marked and cordoned off with fencing, their root system protected, and any damage to the trees avoided</p> <p>(c) Adjacent wetlands and streams shall be protected from construction site run-off with appropriate erosion and sediment control feature to include by not limited to hay bales and silt fences</p> <p>(d) There will be no unlicensed borrow pits, quarries or waste dumps in adjacent areas, especially not in protected areas.</p> |
| G. Disposal of medical waste | Infrastructure for medical waste management | <p>(a) In compliance with national regulations the contractor will insure that newly constructed and/or rehabilitated health care facilities include sufficient infrastructure for medical waste handling and disposal; this includes and not limited to:</p> <ul style="list-style-type: none"> ▪ Special facilities for segregated healthcare waste (including soiled instruments “sharps”, and human tissue or fluids) from other waste disposal; and ▪ Appropriate storage facilities for medical waste are in place; and ▪ If the activity includes facility-based treatment, appropriate disposal options are in place and operational |
| H Traffic and Pedestrian Safety | Direct or indirect hazards to public traffic and pedestrians by construction activities | <p>(a) In compliance with national regulations the contractor will insure that the construction site is properly secured and construction related traffic regulated. This includes but is not limited to</p> <ul style="list-style-type: none"> ▪ Signposting, warning signs, barriers and traffic diversions: site will be clearly visible and the public warned of all potential hazards ▪ Traffic management system and staff training, especially for site access and near-site heavy traffic. Provision of safe passages and crossings for pedestrians where construction traffic interferes. ▪ Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement ▪ Active traffic management by trained and visible staff at the site, if required for safe and convenient passage for the public. ▪ Ensuring safe and continuous access to office facilities, shops and residences during renovation activities, if the buildings stay open for the public. |

PART D: MONITORING PLAN

| Activity | What (Is the parameter to be monitored?) | Where (Is the parameter to be monitored?) | How (Is the parameter to be monitored?) | When (Define the frequency / or continuous?) | Why (Is the parameter being monitored?) | Who (Is responsible for monitoring?) |
|---------------------------|--|---|---|--|---|--|
| CONSTRUCTION PHASE | | | | | | |
| 1. | | | | | | |
| 2. | | | | | | |
| n. | | | | | | |
| OPERATION PHASE | | | | | | |
| 1. | | | | | | |
| 2. | | | | | | |
| n. | | | | | | |

Monthly Field Environmental Monitoring Checklist

| | | | | | |
|--|--------|-----------|----|-----|----------|
| Site location | | | | | |
| Name of contractor | | | | | |
| Name of supervisor | | | | | |
| Date of site visit | | | | | |
| Status of civil works | | | | | |
| Documents and activities to be examined | Status | | | | Comments |
| | Yes | Partially | No | N/A | |
| Contractor holds license for extraction of natural resources | | | | | |
| Contractor holds permit for operating concrete/asphalt plant | | | | | |
| Contractor holds agreement for final disposal of waste | | | | | |
| Contractor holds agreement with service provider for removal of household waste from site | | | | | |
| Work site is fenced and warning signs installed | | | | | |
| Works do not impede pedestrian access and motor traffic, or temporary alternative access is provided | | | | | |
| Working hours are observed | | | | | |
| Construction machinery and equipment is in standard technical condition (no excessive exhaust and noise, no leakage of fuels and lubricants) | | | | | |
| Construction materials and waste are transported under the covered hood | | | | | |
| Construction site is watered in case of excessively dusty works | | | | | |
| Contractor's camp or work base is fenced; sites for temporary storage of waste and for vehicle/equipment servicing are designated | | | | | |

| | | | | | |
|---|--|--|--|--|--|
| Contractor's camp is supplied with water and sanitation is provided | | | | | |
| Contractor's camp or work base is equipped with first medical aid and fire-fighting kits | | | | | |
| Workers wear uniforms and protective gear adequate for technological processes (gloves, helmets, respirators, eye-glasses, etc.) | | | | | |
| Servicing and fuelling of vehicles and machinery is undertaken on an impermeable surface in a confined space which can contain operational and emergency spills | | | | | |
| Vehicles and machinery are washed away from natural water bodies in the way preventing direct discharge of runoff into the water bodies | | | | | |
| Construction waste is being disposed exclusively in the designated locations | | | | | |
| Extraction of natural construction material takes place strictly under conditions specified in the license | | | | | |
| Excess material and topsoil generated from soil excavation are stored separately and used for backfilling / site reinstatement as required | | | | | |
| Works taken on hold if chance find encountered and communication made to the State agencies responsible for cultural heritage preservation | | | | | |
| Upon completion of physical activity on site, the site and contractor's camp/base cleared of any remaining left-over from works and harmonized with surrounding landscape | | | | | |

Attachment 6.

Minutes of Public Consultation Meeting on the present ESMF