Yichang to Badong Expressway Project

TERMS OF REFERENCE

Client’s Environmental Supervision Consultant

Final

The World Bank Financed Project Office of HPCD
22 September 2008
TERMS OF REFERENCE

Hubei Yichang-Badong Expressway (YBE)
Client’s Environmental Supervision Consultant

Objective of the Assignment:

The Consultant is to provide professional technical services (“the Services”) to help ensure effective implementation of the Environmental Management Plan (EMP) during the construction of the World Bank financed Yichang-Badong Expressway (YBE).

Background:

Hubei, with a population of 60.2 million, is a land-locked province in central China and one of the key industrial and agricultural production bases in the country. The province has a need for improved high grade access to key facilities. The proposed 176 km YBE runs along the northern bank of the Yangtze River from Yichang to Badong in western Hubei province. The YBE is the last section of the expressway linking Wuhan to Chengdu not yet open to traffic.

The YBE traverses mountainous terrain in environmentally sensitive areas, including the ‘Three Gorges National Geological Park’ and the Shennongxi, Gaolan and Xiaofeng Scenic Areas. The project design has successfully eliminated and minimized most of the major impacts of the Expressway through: (i) careful selection of the YBE alignment; (ii) by locating waste materials disposal sites away from sensitive locations; and, (iii) by ensuring that the access roads and disposal sites are properly engineered, etc. For the remaining impacts, mitigation measures have been adopted.

To ensure that these and other environmental measures are properly implemented during the construction of the Expressway, the Hubei Provincial Communications Department (HPCD) would like to adopt the following:

i. improved methods for environmental supervision and monitoring;

ii. improved linkages between the safeguards documents, namely the Environmental Management Plan (EMP), and the bid documents/contracts;

iii. introduction of an environmental compliance framework for contractors;

iv. pilot testing of ‘Environmentally and Socially Responsible Procurement’; and

v. pilot testing of a ‘Safeguards Compliance Monitoring System’ (SCMS) for resettlement.

These innovations are called for because of the particularly sensitive environment in the project area. It is expected that these innovations will: (i) reduce the impact of the
construction activities on the environment; (ii) improve compliance with the project’s environmental safeguards, (iii) improve employment and living conditions for workers; and (iv) provide a demand driven system for the rapid identification and resolution of safeguard grievances. These activities are a major advancement in the area of safeguards application and are potentially replicable on other transport projects in China and elsewhere.

The project has prepared and disclosed to the local communities and internationally a number of safeguards documents describing the project, including: Environmental Impact Assessment (EIA), Social Assessment (SA), and particularly the EMP. In order to achieve the goal of minimizing the negative environmental impacts of the project, the EMP has been integrated in the design of the YBE and in the technical specifications and contract documents. It will need to be closely followed and implemented by the contractors. The implementation of the EMP will therefore involve three parties:

- The Contractor’s Environmental Team (CET). They are responsible for implementing the EMP and other construction related environmental and safety issues.
- The Construction Supervision Engineers (CSE) who are responsible for supervising and monitoring all construction activities and for ensuring that contractors comply with the requirements of the contracts and the EMP; and,
- A “Client’s Environmental Supervision Consultants” (CESC). The Client’s Environmental Supervision Consultant (CESC) will check, review, verify and validate the overall environmental performance of the project through regular inspections and audits. This auditing will provide confirmation that the reported results are valid and that the relevant mitigation measures and monitoring program provided in the Project EMP are fully complied with. They will also supply specialized assistance to the client in environmental matters.

This Terms of Reference is for the Client’s Environmental Supervision Consultant (CESC) activities.

**Scope of Services:**

The general services to be provided by the CESC are to inspect, monitor and audit the construction activities\(^1\) to ensure that mitigation measures adopted in the EMP are properly implemented, and that the negative environmental impacts of the project are minimized.

\(^1\) The term ‘construction activities’ in this TOR pertains to all aspects related to the YBE during the construction phase including, but not limited to, all construction sites, permanent and temporary camps, off-site activities (disposal sites, borrow pits), all associated facilities (crushing plants, asphalt plants, maintenance yards), access roads, traffic and disturbances (dust, noise) in local roads, areas of impact away from the road alignment (water quality downstream of the road for instance), etc. The EIA and EMP contain a full description of these activities. They are available for download from <www.isafeguards.com>.
Each contractor’s CET has the responsibility for ensuring compliance with the project EMP and contract conditions while undertaking the works. This is overseen by the CSE. The CESC is therefore to be an independent monitor to ensure compliance with the EMP and to ensure adequate performance of the CSE and the contractors (including CET) on environmental issues.

The CESC reports directly to the Project Office (see below) but is expected to work closely with the CSE to whom they can make recommendations to improve the environmental responses, which may potentially include recommendations for design modifications. However, the responsibility for all design modifications rests with the CSE and the Project Office.

The CESC shall be comprised of a team leader, deputy team leaders and field environmental engineers to inspect, monitor and audit the 31 civil works contracts, the location of which are shown below. There are a further four pavement contracts.

<table>
<thead>
<tr>
<th>Civil Works Contracts</th>
<th>Contracts</th>
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</thead>
<tbody>
<tr>
<td>YBE1 K4.9 - K11.4</td>
<td>YBE12 K73.9 – K81.3</td>
</tr>
<tr>
<td>YBE2 K11.4 - K19.1</td>
<td>YBE13 K81.3 – K85.7</td>
</tr>
<tr>
<td>YBE3 K19.1 - K25.4</td>
<td>YBE14 K85.7 – K90.6</td>
</tr>
<tr>
<td>YBE4 K25.4 - K29.8</td>
<td>YBE15 K90.6 – K95.9</td>
</tr>
<tr>
<td>YBE5 K29.8 - K35.4</td>
<td>YBE16 K95 - K101.4</td>
</tr>
<tr>
<td>YBE6 K35.4 - K41.1</td>
<td>YBE17 K101.4 - K107.5</td>
</tr>
<tr>
<td>YBE7 K41.1 - K48.8</td>
<td>YBE18 K107.5 - K112.1</td>
</tr>
<tr>
<td>YBE8 K48.8 - K53.4</td>
<td>YBE19 K112.1 - K117.1</td>
</tr>
<tr>
<td>YBE9 K55 - K62.3</td>
<td>YBE20 K117.1 - K122.8</td>
</tr>
<tr>
<td>YBE10 K62.3 - K67</td>
<td>YBE21 K122.8 - K130.6</td>
</tr>
<tr>
<td>YBE11 K67 - K73.9</td>
<td>YBE22 K130.6 - K135.1</td>
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</tbody>
</table>
The CESC shall have extensive knowledge and experience in environmental supervision, monitoring and auditing to provide independent, objective and professional advice to the client on the environmental performance of the project. The CESC shall familiarize himself with the project works through review of the relevant reports, including the EIA, SA, EMP as well as project technical specifications and contract documents.

The CESC is expected to perform the following duties:

**Phase I: Strengthening Environmental Management**

During the project preparation, a Strategic Environmental Assessment (SEA) of Hubei’s road transport sector was undertaken by international and domestic consultants. Based on the recommended action plan from the SEA, it was agreed by the HPCD that priority would be given to improving the effectiveness of environmental supervision on the HPCD’s projects. The CESC will therefore strengthen environmental management by:

a. reviewing the EIA, SA and EMP and the project design and technical specifications and confirm that there have been no major omissions of mitigation measures

b. preparing a guide for contractors on implementing the EMP;

c. preparing a guide for the Construction Supervision Engineers (CSE) on how to undertake supervision, including monitoring of effectiveness; and,

d. preparing and executing a training program in support of the above two guides.

**Phase II: Monitoring and Auditing Construction Activities**

On behalf of the Project Office, the CESC will:

a. review, inspect and audit in an independent, objective and professional manner in all aspects of the implementation of the EMP;

b. validate and confirm the adequacy and accuracy of the contractors’ (CET) and supervision engineers’ (CSE) monitoring data, equipment, locations, procedures and locations of sensitive receivers;

c. carry out random monitoring checks and audits on monitoring and supervision data, etc;

d. conduct regular site inspections;

e. audit the status of implementation of environmental protection measures against the EMP and contract documents;

f. review the effectiveness of environmental mitigation measures and project environmental performance;

g. on an as needed basis, review the environmental acceptability of the construction methodology (both temporary and permanent works), relevant
design plans and submissions. Where necessary, the CESC shall seek and recommend the least environmental impact alternative in consultation with the designer, the Contractor(s), and the HPCD;

h. verify the investigation results of any non-compliance of the environmental quality performance and the effectiveness of corrective measures; and

i. provide regular feedback audit results to the client and CSE teams according to the procedures of non-compliance in the EMP.

j. provide training programs at minimum three monthly intervals for CET, CSE and Project Office staff to appraise them of issues identified and how to improve environmental compliance.

**Phase I: Strengthening Environmental Management**

The objective of Phase I is to lay the groundwork for the successful execution of the project. In this phase, the CESC shall: (i) review the EIA, EMP SA, project designs and technical specifications and confirm that there have been no major omissions of mitigation measures; (ii) prepare a guide for contractors (CET) on implementing the EMP; (iii) prepare a guide for the environmental staff of the Construction Supervision Engineers (CSE) on how to undertake supervision, including monitoring of effectiveness; and, (iv) develop and execute a training program based on the guides.

The two guides shall be approved by the Project Office and the World Bank prior to formal implementation.

1. **REVIEW OF PROJECT DOCUMENTS**

The CESC shall review the EIA, EMP, SA, project designs and technical specifications and confirm that there have been no major omissions of mitigation measures. Should any issues be identified, the CESC shall propose to the Project Office updates to the EMP and the design and technical specifications to address these issues. Once approved by the Project Office, the CESC shall update the EMP.

In particular, the CESC shall confirm the appropriateness of the EMP Action Levels/Limit Levels, and the actions which are triggered when these are exceeded. An example of these for air quality limits are in the table below.

<table>
<thead>
<tr>
<th>EVENT</th>
<th>CESC</th>
<th>ACTION</th>
<th>CSE</th>
<th>CONTRACTOR (CET)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Breach of the Action Level (AL)</td>
<td>1. Check monitoring data submitted by Contractor’s environment staff; 2. Identify source, investigate the causes of exceedance / non-</td>
<td>1. Notify Contractor(s) to take action within a specified time frame; 2. Supervise the implementation of remedial actions carried out by</td>
<td>1. Strictly implement the listed measures in EMP; 2. Undertake self-check and self-rectify activities.</td>
<td></td>
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</tbody>
</table>
### Terms of Reference – Hubei Yiba Client’s Environmental Supervision Consultant

<table>
<thead>
<tr>
<th>EVENT</th>
<th>ACTION</th>
<th>CONTRACTOR (CET)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Breach of the Limit Level (LL)</td>
<td></td>
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</tr>
<tr>
<td>1. Identify source, investigate the causes of exceedance / non-compliance and Notify CSE and Contractor(s);</td>
<td>1. Confirm receipt of notification of failure in writing;</td>
<td>3. Strengthen the coordination with the CSC and CESC.</td>
</tr>
<tr>
<td>2. Carry out analysis of Contractor’s working procedures to determine possible mitigation to be implemented;</td>
<td>2. Notify Contractor(s) to take immediate action;</td>
<td>4. Propose and rectify any unacceptable practice;</td>
</tr>
<tr>
<td>3. Discuss amongst CSE, and Contractor(s) on the potential remedial actions;</td>
<td>3. In consolidation with the CESC, agree with the Contractor(s) on the remedial measures to be implemented;</td>
<td>5. Amend working methods if appropriate;</td>
</tr>
<tr>
<td>4. Attend the meeting with the CSE and Contractor(s), if appropriate;</td>
<td>4. Ensure remedial measures properly implemented;</td>
<td>6. Ensure efficient and adequate wastewater treatment facilities are in place;</td>
</tr>
<tr>
<td>5. Review Contractor’s remedial actions and adequacy of environmental control measures whenever necessary to assure their effectiveness and advise the CSE accordingly;</td>
<td>5. If exceedance / non-compliance continues, consider what portion of the work is responsible and instruct the Contractor(s) to stop that portion of work until the exceedance is abated;</td>
<td>7. Timely implementation of remedial actions recommended by CESC;</td>
</tr>
<tr>
<td>6. Audit the implementation of remedial measures.</td>
<td>6. Proceed with the ‘Penalty and Rewarding’ process if appropriate;</td>
<td>8. Notify CSE and CESC upon completion of remedial actions.</td>
</tr>
<tr>
<td>7. Inform EPB if appropriate.</td>
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</tr>
</tbody>
</table>

#### Notes:
1/ The ‘Action Level’ (AL) arise when there is either a single minor infringement, a complaint is received, or the measurements are approaching the government set regulatory limits. In this instance actions are taken to ensure that the situation does not further deteriorate. ‘Limit Level’ (LL) arise when there are repeated non-compliance issues, two or more consecutive events, or a breach of government set regulatory limits.

### 2. PREPARATION OF GUIDES

The CESC shall prepare: (i) an implementation guide for contractors (CET) clearly identifying how the EMP shall be implemented, and, (ii) a guide for environmental supervisors (CSE) on how to undertake supervision, including monitoring of effectiveness. These guides shall include, as a minimum:

#### Record-Keeping Requirements

The requirements for record-keeping on the project. For example, during inspection / supervision the CESC and CSE shall keep before, during, and after evidence (videos, photos) of critical points/activities along the highway.

#### Environmental Monitoring Checklist

The CESC shall establish a comprehensive checklist which will be used during the construction of the project to monitor the contractor’s performance. This shall cover
major aspects of the project, required mitigation / control measures and their implementation schedule. An example of a monitoring checklist is given in the generic EMP manual available for download from:


**Environmental Monitoring Form**

The CESC shall establish standard form(s) to be used by the contractor’s CET staff during their daily field visits. An example of the form is in Annex G of the generic EMP manual. The CESC shall ensure that this or similar form is used to record information throughout the project, updating it, if required, based on feedback from the CET and CSE staff.

**Log-Book**

Each CESC and CSE field engineer shall keep a log-book of each and every circumstance or change of circumstances which may affect the environmental impact assessment and non-compliance with the recommendations made by the CESC to remediate the non-compliance. The guides will contain the log-book form to be adopted. The Generic EMP has an example of log-book forms in Annex D.

**Contractor Reporting Plan**

The CESC shall confirm the monthly contractor environmental reporting plan format and contents. This shall be based on the recommended report plan in Section 8.2.4 of the Generic EMP.

**Environmental Emergency Procedures**

Environmental emergency procedures relate primarily to the event of accidental leaks, spills or emissions. Events related to adverse weather conditions should be addressed through the Project Activity Safety Plan (PASP) as part of the Contractor’s Safety Plan, which should be submitted to the CSE before commencement of project construction works. The CESC shall review the submitted PASP and provide comments to the CSE, to be addressed by the contractors.

The final PASP will be approved by the Project Office and the World Bank prior to formal adoption.

**Compliance Framework**

The HPCD and the World Bank jointly devised a compliance framework for the YBE designed to motivate contractors to comply with the EMP. This compliance framework is based on the environmental requirements established by the EMP and will be strictly
enforced. For minor infringements—an incident which causes temporary but reversible damage—the contractor will be given a reasonable period of time to remediate the problem and to restore the environment. If restoration is done satisfactorily during this period, no further actions will be taken. If it is not done during this period, the Project Office will immediately arrange for another contractor to do the restoration, and deduct the cost from the offending contractor’s next payment. For major infringements—an incident where there is long-term or irreversible damage—there will be a financial penalty in addition to the cost for restoration activities. To minimize the damage, the restoration activities will be implemented without delay.

The compliance framework will be applied as follows:

- The CSE (or CESC) will identify or be notified of an infringement
- The CSE in consultation with the CESC will assess whether it is a minor or major infringement.
- For minor infringements:
  - The CSE will establish the required mitigation measures, and the time period, which is a maximum of two days, to remedy the situation.
  - The CESC will review the recommendation and confirm (i) the level of infringement (minor/major); (ii) the mitigation measures; and (iii) the mitigation time period. If they do not agree, they will work with the Project Office to reach a mutually acceptable recommendations.
  - The CET will be informed of the infringement, the required mitigation measures, and time period for resolution.
  - The contractor shall remedy the infringement in accordance with the recommendations within the agreed time period.
  - The CSE shall confirm the infringement is satisfactory remedied in the time period, and inform the CESC who will independently confirm.
  - If the infringement is not remedied satisfactorily in the time period the CSE shall inform the CESC and the Project Office. The Project Office shall immediately arrange for a separate contractor to undertake the necessary works and the cost of this shall be deducted from the next payment to the offending contractor.
- For major infringements:
  - The CSE shall immediately inform the Project Office and the CESC of the incident
  - The Project Office shall inform the appropriate provincial authorities if appropriate
  - The Project Office, in consultation with the CSE, CESC and other provincial authorities as appropriate, shall agree upon mitigation and clean up measures to be undertaken immediately by the contractor or by specialists to be procured at the contractor’s expense. To minimize the environmental impacts the restoration activities should be completed within seven days.
The Project Office shall apply a financial penalty, not to exceed 1% of the contract cost, for each major infringement, in addition to any costs associated with the infringement not borne by the contractor.

Any conflicts between the CET, CSE and CESC shall be resolved by the Project Office.

During training the CESC shall make clear how the compliance framework will be applied.

In preparing the guides, the CESC shall summarize the requirements of the EMP into a concise annex which clearly shows the contractors when and how the compliance framework shall be applied.

**Health and Safety**

The guides shall clearly identify the requirements of the health and safety clauses in the contracts. This shall include, but not be limited to: (i) construction activities; (ii) HIV/AIDS education campaign (which is financed under a separate contract); (iii) compliance with China’s labor laws; and, (iv) road traffic safety.

3 **Environmental Training**

Based on the two guides, the CESC shall design and execute a comprehensive training program for the CSE team staff, key CET staff from each Contractor, Project Office staff, and others as appropriate, on the environmental requirements of the project, and how they will be supervised, monitored and audited. This will introduce the guides, and give particular attention to:

- **EMP:** The requirements of the EMP, the agreed environmental monitoring checklist, the environmental monitoring form, how non-compliance with the EMP will be handled, and all other key issues shall be covered. Particular attention will be paid to the specific provisions in each contract’s technical specifications indicating how the EMP is to be complied with. An example of an EMP training manual can be downloaded from:


- **EMP Compliance Framework:** The compliance framework shall be provided to the contractors along with information on how it is to be applied.

- **Project Activity Safety Plan:** The contents and requirements of the PASP shall be provided, along with how it will be implemented.

- **Health and Safety:** The health and safety requirements of the project shall be clearly identified and communicated with the Contractors and the Project Office.

At the conclusion of the training contractors will also sign a statement acknowledging their awareness of the environmental regulations, the compliance framework, PASP and health and safety obligations. The CSE shall sign a similar statement confirming their
understanding of the supervision responsibilities. This shall be provided to the Project Office and the World Bank.

**Phase II: Monitoring and Auditing Construction Activities**

**Review of Site Plans**

To ensure consistency across the project, the CESC shall provide the final review and recommend clearance of all site plans which may affect the environment. These include, but are not limited to: Waste Management Plan; Landscape Implementation Programme and Compensatory Planting Plan; Site Drainage Management Plan; Borrow and Fill area plans; Access Roads Development Plans, etc. Where these plans are found not to comply with the EMP, EIA or SA, the CESC shall work with the CSE and Contractor to establish a suitable solution which complies.

**Safety Plans**

To ensure consistency across the project, the CESC shall provide the final review and recommend clearance of all Contractor’s Safety Plans, and, based on these, with inputs from the CSE, prepare an overall PASP. The PASP shall include procedures such as the prevention of slope slide / soil erosion during the rainfall season. These plans shall be reviewed on an annual basis and updated if necessary.

**Health and Safety**

The CESC shall ensure that the CSE are enforcing the requirements of the health and safety clauses in the contract documents. This shall include, but not be limited to: (i) construction activities; (ii) HIV/AIDS education campaign (which is financed under a separate contract); (iii) compliance with China’s labor laws; and, (iv) road traffic safety. For HIV/AIDS the focus shall not only be on the construction sites themselves, but also on assisting the nearby communities.

**Site Inspections**

The CESC shall closely audit the construction activities through regular site inspections accomplished through daily site visits, walks and visual inspections to identify areas of potential environmental problems and concerns. As noted in footnote 1 of this TOR, the area of inspection should cover both the construction areas and the environment outside the site area that could be affected, directly or indirectly, by the contractor’s activities.

Inspections should be done independently of the contractor’s CET staff. It is expected that the CESC shall have their own hand held and portable monitoring equipment (for noise, air, water quality, etc.), transport and other resources. Where definitive monitoring is necessary to resolve contentious issues or to impose penalties, the CESC may contract the local Environmental Monitoring Stations of the EPB to carry out specific monitoring at the locations under review.
Where there is infringement of technical specifications, or condition of contracts, or non-compliance with the EMP, the CSE shall be immediately informed and the compliance framework as described earlier shall be applied.

The CESC shall also report all infringements to the Project Office as part of the monthly reporting.

Regular joint environmental site inspections (e.g. weekly) should be organized by the CESC and CSE teams, with participation from the Contractor’s environmental and construction team. These should be used as an opportunity for the CESC to further train the CSE and CET staff.

Each CESC field engineer’s log-book shall be kept readily available for inspection by all persons assisting in project management. The CESC shall verify the log-books kept by the CSE teams as part of their regular environmental audits.

The CESC shall also regularly review the records of the contractors to ensure that they are up to date, factual and meet the EMP reporting requirements (e.g. environmental complaint monitoring records).

**Complaints**

Complaints may be received by the Project Office from local residents with regard to environmental infractions such as noise, dust, traffic safety, etc. The CESC and CSE shall be provided a copy of these complaints and CESC shall confirm that they are properly addressed by the CSE in the same manner as incidents identified during site inspections.

**Unforseen Impacts**

In the event that an incident arises which was not forseen in the EMP or EIA, the CESC shall work closely with the CSE and the Project Office to confirm satisfactory resolution to the incident. The CESC shall then update the EMP and the implementation guidelines, training the CET staff accordingly.

**Monthly Payments**

The CESC shall confirm the monthly payments for environmentally related activities as recommended by the CSE to the client.

**Site Restoration and Landscaping**
The CESC shall closely monitor all activities with regard to site restoration and landscaping, such as greening works along the expressway, replanting, disposal area restoration, etc. to ensure that the activities are done to an appropriate and acceptable standard.

**Project Initiation and Staffing:**

It is anticipated that the CESC will be mobilized three months before the start of the construction activities. The three month start up time will be utilized by the CESC to review and familiarize itself with the project, the project design, the technical specifications, contract documents, the EIA, EMP and SA reports and other project relevant documents and reports. Following the review, the CESC will prepare a brief report on the potential issues and challenges arising from the implementation of the EMP and the condition of contracts and make recommendations to the Project Office about how best to improve the implementation of the EMP.

During this period, the CESC will prepare the two training guides. As soon as the CET and CSE are appointed, the CESC will commence the training program for the CETs from each contractor, the CSE’s environmental staff, staff from the Project Office and CESC’s own field staff.

It is recognized by the HPCD that the level of knowledge and expertise required to carry out the environmental auditing of the YBE project may not be readily available in China. In which case, the CESC may wish to partner with an international firm with expertise in this field and who may assist CESC to deliver the first six months of the program, i.e. initial preparation of environmental training and forms to assistance with the delivery of training and first three months of environmental supervision, inspection, and auditing of the implementation of the EMP.

While the level and expertise of the CESC staffing may vary from time to time to suit the delivery of the training program and field work, it is anticipated that the staffing for the assignment will consist of one team leader, and three deputy leaders with appropriate support staff. The field staff is anticipated to be as follows:

- **Subgrade and civil works phase** – 15 environmental engineers
- **Paving works and greening phase** – 4 environmental engineers
- **Site restoration and cleanup, including preparation of final report and lessons learnt** – 2 environmental engineers.

The largest number of staff are expected to be mobilized at the beginning of the contract, to prepare the necessary guidelines, documentation, training, etc. As the project moves into implementation and the training is completed, the staffing will be reduced to the team and deputy leaders, 15 field environmental engineers, and supporting staff. Once the project reaches the paving works and greening phase, the number of field environmental engineers will be reduced to 4 with a commensurate reduction in the number of other staff.
To ensure consistency, the field environmental engineers will be rotated at three monthly intervals between different parts of the site.

**Reporting:**

As a minimum the CESC shall prepare the following written reports:

- Weekly report of non-compliance issues
- Summary monthly report of key issues and findings from auditing activities
- Summary monthly report of key issues arising from CSE supervision activities
- Consolidated summary report from contractor’s monthly report

They shall also collect and report on data as requested by the Project Office.

At the end of the project the CESC shall prepare a final report summarizing the key findings from their work, the number of infringements, resolutions, etc. as well as advice and guidance for how such assignments should be conducted in the future.

During the course of the project the CSEC shall provide briefings as requested to the Project Office, environmental agencies, the World Bank, and others as requested by the Project Office on the project progress, incidents, and other issues associated with environmental management and supervision. As a minimum these are expected to be at six-monthly intervals.