E2250

Fast Track Initiative Catalytic Fund Grant for Tajikistan

ENVIRONMENTAL MANAGEMENT FRAMEWORK

for

Identification and Analysis of Environmental Impacts Of the Grant Activities

July 2009

1. Introduction

International Bank for Reconstruction and Development and International Development Association (collectively the Bank) and the Republic of Tajikistan are entering into a Grant Agreement for Fast Track Initiative Catalytic Fund Grant – FTI-3 (third year bridging allocation).

The overall Grant development objective is to contribute to an increased *access* to improved learning environments and a more *efficient delivery* of *quality* education services. The Grant is designed to help fill gaps in the implementation of the National Strategy for Education development (NSED), particularly with respect to the goals to improve the physical infrastructure, and material and technical aspects of the education system; to improve the management and performance of the education system for the delivery of quality education services; and to ensure the quality of education services.

The Grant is managed and implemented by the Ministry of Education (MOE) of the Republic of Tajikistan with support from local consultants.

The Grant has the following 4 components with sub-components.

Component 1: Improving the learning environment. The objective of this component is to increase access to improved learning environments, thus contributing to the NSED's fifth goal to improve the physical infrastructure and material and technical aspects of the education system.

Sub-component 1.1: Civil Works (USD 7.7 million, excluding contingencies). This sub-component aims to upgrade the physical infrastructure of schools, to the benefit of approximately 12,400 students. It will cover the construction or rehabilitation of premises at approximately 25 schools in Sugd province and RRS[1]. In light of the importance given to decentralized management of education services in education reforms, the Grant will also build premises for 1-2 rayon education departments.

The civil works sites will be chosen based on certain criteria defined in the Operational Manual. The criteria include school buildings that are in an emergency condition, the potential for in-school consolidation, three- shift schools, and schools with at least 250 students or of a sufficient size to ensure a double-shift use of any newly built or rehabilitated school. Sites will be selected from poorer rayons that have received relatively little donor support. School buildings will be based on standard designs using classrooms large enough to enable the consolidation of class groups and a more efficient use particularly of teachers under the consolidation efforts being promoted as part of per capita financing reforms. The schools should demonstrate a prior capacity to maintain the school, and the local community and authorities will in some cases be expected to contribute to ensuring the availability of water, electricity and heating, as well as an enclosed and landscaped school grounds. All civil works will include sanitation facilities, using where feasible pour-flush toilets.

With respect to safeguard policies, the Grant will finance the MOE to contract an independent expert to monitor compliance of all civil works financed by FTI with resettlement safeguards.

[1] RRS – Rayons of Republican Subordination.

The expert will report to the Grant Coordinator, under the MOE. The Consultant Chief Civil Works Engineer, with the support of the two Regional Civil Works Coordinators, will be responsible for monitoring compliance of the civil works with environmental safeguards. (S)he will report both to the Head of the Department of Capital Construction (DCC) and the Grant Coordinator on these matters. Site-specific environmental management plans will be developed along with engineering designs for rehabilitation/construction of individual buildings and will be included in the contracts for firms carrying out the work. Using EPDF funds, the World Bank will also provide an external monitoring of environmental and resettlement safeguards compliance, through its consultants (engineer and lawyer).

Sub-component 1.2: Furniture (USD 2.5 million, excluding contingencies). This sub-component aims to ensure that all new and rehabilitated school buildings (completed under sub-component 1.1) are fully furnished through supplying furniture for selected schools, benefiting approximately 62,800 students.

Sub-component 1.3: Reading Materials (USD 100,000 FTI, and USD 100,000 UNICEF). This sub-component will provide reading materials for students in primary grades in approximately half of the country's schools.

Component 2: In-service training of pedagogical and managerial personnel.
Sub-component 2.1: School Directors Training (USD 230,000, excluding contingencies). This sub-component will support training to approximately 600 school directors on school management.

Sub-component 2.2: Mentoring (USD 270,000, excluding contingencies). This sub-component will support training to mentors[2] and provide resources for mentoring support to teachers in approximately 135 schools.

Sub-component 2.3: INSET System Review (USD 250,000, excluding contingencies). This sub-component will support a critical review of teacher retraining courses in the country.

Component 3: Support to policy reform, research and evaluation.
Sub-component 3.1: Per Capita Financing (USD 750,000, excluding contingencies). This sub-component support further development and national introduction of per capita financing (PCF) in general education, with particular emphasis on the remaining districts that are moving to the PCF scheme starting in January 2010.

Sub-component 3.2: Education Management Information System (USD 210,000, excluding contingencies). This sub-component will support education data collection for analysis and decision-making.

Sub-component 3.3: Evaluation of the Supply and Demand-Side Schemes (USD 350,000, excluding contingencies). This component will support the monitoring and evaluation of three

[2] These are teachers' mentors who are responsible for building teacher capacities in teaching-learning methods and reinforcing knowledge and skills acquired during in-service training. Mentors include the Deputy Director of the school, Heads of Methodological Units (teachers also based within the school), as well as rayon-level specialists in mentoring (typically called Methodologists).

attendance-promotion initiatives that include supply and demand-side measures: a cash compensation program supported by the EC, a school meals program supported by the WFP, and an outreach project supported by UNICEF.

Component 4: Capacity building and Grants management.

Sub-component 4.1: Fiduciary and Management Capacity Strengthening (USD 490,000, excluding contingencies). This sub-component aims to improve the fiduciary and management capacities of the MOE through training and TA.

Sub-component 4.2: Grant Management (USD 300,000, excluding contingencies). This sub-component aims to ensure that Grant activities are implemented on time and in a satisfactory manner through provision of TA to the respective un ts in the MOE.

Of the Grant components one sub-component has the potential for environmental impacts: Sub-component 1.1 "Civil Works" that is implemented by the Department of Capital Construction (DCC) within the MOE. It is planned to rehabilitate and build premises in approximately 25 schools and 2 rayon education department for the approximate amount of USD 7.3 million.
It is planned to start civil works in spring 2010. MOE will hire local architectural firm(s) for the CWs design (including technical specifications and bill of quantities) and three international engineers for a third-party proof check (structural, electrical, and HVAC[3]).

2. Purpose of the EMF

The final list of the construction/rehabilitation sites will not be available by appraisal. Therefore, environmental assessment of the project-financed activities can not be carried out at this time. The purpose of this EMF is to provide the MOE, local communities, engineers, environmental consultants, contractors, and other stakeholders a set of instructions for determining the nature and scope of the expected environmental impacts of the rehabilitation and construction works, and for planning measures to mitigate negative impacts if any. The EMF is also to ensure that environmental concerns are duly incorporated in the project design and implementation. Specifically, the EMF provides a blueprint of action for (i) identifying all environmental implications of the planned civil works, (ii) defining what kind of environmental assessment and analysis is required for clarifying short term and long term environmental aspects of these works, (iii) developing a set of prevention and/or mitigation measures aimed at avoiding or decreasing possible harm to the environment, and (iv) producing a plan for monitoring environmental performance in the course of the construction and operation of the premises rehabilitation/constructed under the project. The EMF provides templates (Annexes 1 & 2 respectively) for developing site-specific environmental assessment reports, environmental mitigation and monitoring plans. For facilitating preparation of the required environmental documentation and ensuring compliance of the project implementation with all relevant regulations, the EMF includes an overview of the environmental legislation of Tajikistan and the World Bank's safeguard policies.

3. World Bank Safeguard Policies

[3] Heating, Ventilation and Air Conditioning

All project-financed activities have to be in compliance with the national environmental rules and regulations, as well as with the environmental policies of the World Bank. The Bank requires environmental assessment of the construction of new buildings and environmental management planning for rehabilitation works. While it is not expected that the project will trigger any safeguard other than OP/BP 4.01 *Environmental Assessment* and OP/BP 4.12 *Involuntary Resettlement*, a set of the World Bank's ten safeguard policies is presented in Table 1. It is the responsibility of the Government to ensure that these policies are triggered as required and adhered to.

Table 1: World Bank Safeguard Policies

Safeguard Policy	Summary of Core Requirements
OP/BP 4.01 Environmental Assessment	Screen early for potential impacts and select appropriate instrument to assess, minimize, and mitigate potentially adverse impacts.
OP/BP 4.04 Natural Habitats	Do not finance projects that degrade or convert critical habitats. Support projects that affect non-critical habitats only if no alternatives are available and if acceptable mitigation measures are in place.
OP/BP 4.09 Pest Management	Support integrated approaches to pest management. Indentify pesticides that maybe financed under the project and develop appropriate pest management plan to address risks.
OP/BP 4.10 Indigenous Peoples	Screen to determine presence of Indigenous Peoples in project area. Policy triggered whether potential impacts are positive or negative. Design mitigation measures and benefits that reflect Indigenous Peoples cultural preferences.
OP/BP 4.11 Physical Cultural Resources	Investigate and inventory cultural resources potentially affected. Include mitigation measures when there are adverse impacts on physical culture resources.
OP/BP 4.12 Involuntary Resettlement	Assist displaced persons in their effort to improve or at least restore their standards of living. Avoid resettlement where feasible or minimize. Displaced persons should share in project benefits.
OP/BP 4.36 Forests	Support sustainable and conservation oriented forestry. Do not finance projects that involve significant conversion or degradation of critical forest areas.
OP/BP 4.37 Safety of Dams	For large dams, technical review and periodic safety inspections by independent dam safety professionals.
OP/BP 7.50 Projects on International Waterways	Ascertain whether riparian agreements are in place, and ensure that riparian states are informed of and do not object to project interventions.
OP/BP 7.60 Projects in Disputed Areas	Ensure that claimants to deputed are as have not objection to proposed project.

Note: For detailed explanation of each safeguard policy refer to the World Bank website, specifically, www.worldbank.org/environment/op_policies.htm

4. Related Environmental Laws and Regulations of Tajikistan

There are several laws that are forming the basis of the environmental protection. These laws include:

1. Law of Republic of Tajikistan (RT) on Architecture (1997)
2. Law of RT on Waterways (2000)
3. Law of RT on Fire Precautions (1994, revised in 1996)

4. Law of RT on Waste of Production and Consumption (2002, revised in 2005)
5. Law of RT on Nature Protection (1994, revised in 1996,1997, 2002, 2004, 2007.)
6. Law of RT on Ecological Expertise (2003г. reviewed in 2009г.)
7. Law of RT on Specially Protected Territories and Objects (1996г. Revised in 1998 and 2002)
8. Law of RT on Foreign Investments (1992, revised in 1996, 1997, 1999)
9. Land Code of RT (1996 revised in 1999, 2001, 2004,2006 and 2008)
10. Forestry Code of RT (1993 revised in 1997 and 2008)

It is also important to follow the law that regulates the construction and activities related to buildings rehabilitation. The specifications on rehabilitation and construction should include the guidelines on bituminous (asbestos) materials removal and use. Besides, they should reflect the measures mitigating negative impact of construction, including noise, wastes removal and disposal and security measures.

The security measures on harmful and toxic materials delivery and storage, such as bituminous materials, varnish and paint, asbestos material, and also removal of their wastes are reflected in effective legislative acts, standards and norms (GOST, SNiP, SN).
GOST (State Standards) – standards relevant to construction are to be applied by the Construction and Architecture Agency under the Government of Tajikistan (GOT).
SNiP (Construction Norms and Rules)- to be applied by the Construction and Architecture Agency under the GOT.
SN (Sanitarian Norms)- to be applied by Ministry of Health of RT

After the approval of the final List of the construction sites the written request for preparation and submission of the source data for the development of the cost estimates for new construction objects will be submitted to local Khukumats (local governments). These documentations include the following papers:

1. Act on allocation of a land plot.
2. Decree of the local Khukumat on allocation of a land plot for construction.
3. Certificate for land use.
4. Technical conditions, issued by the government bodies (Sanitary Station, water utility , power networks, ecology and fire protection service).
5. Architectural planning assignment issued by Chief Architect.
6. The land plot scheme with the identified connection points (water pipes, sewerage, and outside lightning).

In accordance to the TOR and according to the source data provided by local Khukumats, selected design company should conduct geological assessment of the land and make topographic mapping of the locality. On the base of the geological data and topographic mapping the design company will design the general plan of the locality. This general plan should be cleared by the bodies, who are responsible for issuance of technical conditions and architectural planning assignment. According to the Law on Ecological Expertise the project should go through the ecological expertise.

5. Proposed Project Activities

The following types of civil works are expected under the project.

Activity
- Construction of new school buildings in the new locations; - Construction of new buildings and/or large scale reconstruction of buildings within location of the existing schools; - Small scale rehabilitation of the existing buildings; - Provision/repair of communications of the existing buildings (water supply, power supply, drainage, sanitation, heating).

6. Environmental Due Diligence Applicable to Various Types of Civil Works:

Construction of new schools in new locations will require an environmental assessment (EA) for each building. This will include provision of a subproject outline; physical description of the selected location and its surroundings; identification of the potential environmental and social impacts of construction and operation of a school in this location as well as potential impacts of the surrounding area on the operation of school; measures for mitigating identified environmental and social impacts of a subproject; and a standard Environmental Management Plan (EMP) containing a detailed schedule for applying the proposed mitigation measures and a monitoring plan (Annex 1). The MOE will be responsible for verifying findings of the EA and adequacy of the EMP, and for ensuring that a subproject meets environmental requirements of the national and local authorities of Tajikistan. The MOE will also ensure that all clearances from the environmental authorities, necessary for implementing a subproject, are obtained. After approval of the EA report and upon receipt of the required clearances, the MOE provides a formal environmental clearance of a subproject and ensures that the EMP is incorporated into tender documentation and is later attached to a contract concluded with the selected provider of civil works.

Construction of new buildings and/or large scale reconstruction of buildings within location of the existing schools will require simplified overview of the environmental aspects of a subproject, which is done through completion of an environmental checklist developed by the World Bank specifically for small construction works (Annex 2). The MOE may complete such checklist using in-house expertise or contract out this task. The checklist allows to identify types of the potential environmental impacts of a subproject and to develop a set of mitigation measures in a more compressed format as compared to an EA report. The checklist carries templates for compiling mitigation and monitoring plans, which comprises an EMP. The MOE will be responsible for the accuracy and quality of information entered into the checklist and will ensure that a subproject is in compliance with the national environmental regulations. The EMP should become an integral part of tender documents and civil works contracts concluded under the subproject.

Small scale rehabilitation of the existing buildings and provision/repair of communications of the existing buildings will require development of a simple EMP. Such EMPs are likely to carry a generic list of environmental issues usually being associated with small construction, such as generation of noise, dust, and vibration during operation of the construction machinery; temporary limitation or restriction of access due to location of a construction camp; congestion of traffic due to transportation of construction materials; soil and water pollution resulting from

operation spills of fuel and lubricants; and accumulation of solid waste at construction camps and generation of construction waste.

There are a couple of environmental concerns associated with construction/rehabilitation of schools, which call for particular attention. These are: (i) ensuring the use of construction materials which do not carry risk for children's health, and (ii) handling/disposing of hazardous waste, which may be generated during rehabilitation of old school buildings constructed with asbestos-containing materials. Conventional standards for ensuring safety at the construction sites and safety of workers should also be respected. EMPs for all subprojects must identify these issues as applicable and provide adequate measures of risk mitigation. Detailed instructions for removal of asbestos-containing fragments of old buildings, their temporary storage, transporting, and disposal must be provided to contractors through the EMPs.

7. Application of Environmental Procedures During the Project Cycle

Screening of Subproject Proposals. Based on the nature of the project, the exact list of all schools to be constructed, reconstructed, and rehabilitated is not know upfront. Application of environmental procedures starts at the very early stage of project activities, which is approval of the sites selected for project intervention. If it is proposed to construct a new school building in a new location, identification of a construction site and its approval should take into account environmental considerations, such as expected impact of construction and operation of a school building on the natural setting of the selected site, as well as adequacy of the environmental quality of the site for placing a children's institution in it.

Identifying the scope of environmental work at subproject preparation. Once a subproject is selected for financing and the general design of civil works is available, the MOE will classify it into one of the main types described in Section 5 of these Guidelines and define whether the subproject calls for an EA, completion of an environmental checklist, or development of a simple EMP. It is advisable that such decision-making does not rely only on the desk review of subproject documentation, but also implies field visit to the subproject site.

Environmental review at subproject appraisal. As a part of checking subproject documentation prior to tendering, the EA report (checklist) and/or EMP must be reviewed to ensure that all environmental risks are identified and relevant measures are prescribed for their mitigation. It is important to check if the proposed mitigation measures are properly costed and budgeted in the subproject documentation. Existence of all required environmental permits should also be checked and ensured at this stage. Tender documentation prepared for procuring civil works under a subproject should include an EMP, which later becomes an attachment to contract.

Environmental supervision of subproject implementation. Environmental compliance of civil works under all subprojects should be monitored as planned in EMPs. The overall responsibility for environmental supervision of works rests with the MOE. Environmental monitoring is expected to be a part of contract supervision and may be carried out by MOE or be contracted out. Environmental monitoring data, including dates of site visits and important findings, should be documented and available on file. If environmental supervision reveals any outstanding issues, the MOE should timely react through the development of corrective measures and ensuring their enforcement. If need be, the MOE should notify relevant government authorities on the environmental problems encountered. The MOE will report on environmental compliance

of subprojects' implementation to the World Bank as a part of regular reporting on project progress.

8. Public Consultation and Disclosure

EA reports for subprojects implying new construction will be disclosed to public through convenient and accessible media in local and English languages. Communities likely to be affected by subproject activities will be consulted on the EA reports and given an opportunity to provide recommendations. The EA reports will be finalized after incorporation of the public feedback and then re-disclosed.

9. Capacity Building:

Training on variety of issues and application of EMP and EMF will be conducted by the MOE engineers and consultants from DCC to the engineers hired by the MOE to supervise constructions on spot, contractors and school directors.

Annex 1. Template for Environmental Management Plan

Mitigation Plan

Construction Phase					
Activity	Expected Environmental Impact	Proposed Measures for Mitigation	Cost	Responsibility for Implementing Mitigation Measure	Period of Implementing Mitigation Measure
1.					
2.					
…					
Operation Phase					
1.					
2.					
…					

Monitoring Plan

Construction Phase				
What *parameter is to be monitored?*	**Where** *is the parameter to be monitored?*	**How** *is the parameter to be monitored? (what should be measured and how)*	**When** *is the parameter to be monitored? (timing and frequency)*	**By Whom** *is the parameter to be monitored? (responsibility)*
1.				
2.				
…				
Operation Phase				
1.				
2.				
…				

Annex 2. 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

PART A: GENERAL PROJECT AND SITE INFORMATION

SITE DESCRIPTION		
Name of site		
Describe site location		Attachment 1: Site Map [ ]Y [ ] N
Who owns the land?		
Description of geographic, physical, biological, geological, hydrographic and socio-economic context		
Locations and distance for material sourcing, especially aggregates, water, stones?		
LEGISLATION		
Identify national & local legislation & permits that apply to project activity		
PUBLIC CONSULTATION		
Identify when / where the public consultation process took place		
INSTITUTIONAL CAPACITY BUILDING		
Will there be any capacity building?	[ ] N or [ ]Y if Yes, Attachment 2 includes the capacity building program	

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	[ ] Yes [ ] No	See Section **A** below
	B. New construction	[ ] Yes [ ] No	See Section **A** below
	C. Individual wastewater treatment system	[ ] Yes [ ] No	See Section **B** below
	D. Historic building(s) and districts	[ ] Yes [ ] No	See Section **C** below
	E. Acquisition of land[4]	[ ] Yes [ ] No	See Section **D** below
	F. Hazardous or toxic materials[5]	[ ] Yes [ ] No	See Section **E** below
	G. Impacts on forests and/or protected areas	[ ] Yes [ ] No	See Section **F** below
	H. Handling / management of medical waste	[ ] Yes [ ] No	See Section **G** below
	I. Traffic and Pedestrian Safety	[ ] Yes [ ] No	See Section **H** below

[4] 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.

[5] 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	(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	(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	(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	(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	(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	(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	(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.

ACTIVITY	**PARAMETER**	**MITIGATION MEASURES CHECKLIST**
D. Acquisition of land	Land Acquisition Plan/Framework	(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	(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 be 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	(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	(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. (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 (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 (d) There will be no unlicensed borrow pits, quarries or waste dumps in adjacent areas, especially not in protected areas.
G. Disposal of medical waste	Infrastructure for medical waste management	(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:

		▪ 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	(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 ▪ 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?)
1. Type of activity						
2. Type of activity						
3. Type of activity						