

Environmental Assessment and Review Framework

July 2022

Kyrgyz Republic: School Education Reform Sector Development Program

Prepared by the Ministry of Education and Science of the Kyrgyz Republic for the Asian Development Bank.

CURRENCY EQUIVALENTS

(as of 08 July 2022)

Currency unit	–	som (Som)
Som1.00	=	\$0.0150
\$1.00	=	Som80.0220

ABBREVIATIONS

ADB	–	Asian Development Bank
A C M	–	asbestos-cement materials
EIA	–	environmental impact assessment (OVOS is the national acronym)
EIS	–	environmental impact statement
EMP	–	environmental management plan
GRG	–	Grievance Redress Group
GRM	–	grievance redress mechanism
IEE	–	initial environmental examination
KAE	–	Kyrgyz Academy for Education
LSGB	–	local self-government body
MES	–	Ministry of Education and Science of the Kyrgyz Republic
PAP	–	project affected person
PIU	–	project implementation unit
SEER	–	state environmental expert review
SESDP	–	School Education Reform Sector Development Program
STEM	–	science, technology, engineering, and mathematics

NOTE

(i) In this report, “\$” refers to United States dollars.

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I. INTRODUCTION

1. The Government of the Kyrgyz Republic recognizes the importance of education for economic and social development and political stability in the country, and the need for investment in education. However, despite past efforts to renew the physical infrastructure, the conditions in many schools remain unsatisfactory. This includes, among others, heating, sanitary conditions, furniture, and basic equipment of science, technology, engineering, and mathematics (STEM) classrooms. Investments in the above areas are globally recognized to lead to improved learning outcomes.

2. To assist the Government, the Asian Development Bank (ADB) has proposed the School Education Reform Sector Development Program to strengthen human capital to contribute to the country's development and economic growth. The program will have the following outcome: the ability of the school education system to prepare graduates with subject knowledge, competencies and soft skills improved. The program will deliver three outputs: (i) quality and relevance of curricula improved with priority on interdisciplinary approaches, (ii) quality of teaching improved, and (iii) network of Innovative schools strengthened. The program will (i) rehabilitate an additional 23 innovative schools and the Kyrgyz Academy of Education (KAE) to nationalize what has been recognized by the Ministry of Science and Education (MES), through rapid research methods, as a successful practice. The program will be implemented within 5 years (2023–2027).

3. **Impact and outcome.** The program is aligned with the following impact: Strengthened human capital that contributes to the country's development and economic growth. The project will have the following outcome: the ability of the school education system to prepare graduates with subject knowledge, competencies and soft skills improved.

- **Output 1: Quality and relevance of curricula with priority on interdisciplinary approaches improved.** The policy-based grant component will support the government to (i) revise the state standard of general school education and subject curricula; (ii) gradually implement new 12-year subject curricula; and (iii) set up a regulatory framework for curriculum development. The project component will help to (i) strengthen the capacity of KAE and the Ministry of Education and Science (MES) textbook assessment unit; (ii) build capacity of the curriculum developers (both institutions and individual experts); (iii) design and implement a step-by-step model for curriculum development review and approval; and (iv) revise the curricula for grades 6–12.
- **Output 2: Quality of teaching improved.** The policy-based grant component will support the government to (i) revise the teacher salary structure to incentivize better performance and continuous development; (ii) approve the teacher professional standards; (iii) revise pedagogical university education standards; and (iv) introduce a fast-track teacher qualification program in universities to bring in mid-career professionals into teaching. The project component will (i) help to upgrade pedagogical programs in universities; (ii) launch in-service teacher training school management and instructional leadership training program and (iii) train 10,000 teachers to implement the revised curriculum in schools with a focus on language and STEM.
- **Output 3: Network of Innovative schools strengthened.** The policy-based grant component will support the government to (i) expand the network of innovative schools with considerable administrative, academic and financial autonomies. The project will (i) rehabilitate 23 innovative schools and KAE; (ii) upgrade the STEM and information and communication technology (ICT) equipment of 23 new and 30 existing innovative

schools and provide laboratory equipment to 220 cluster¹ schools; (iii) design and implement a training program on school management, instructional leadership, and communication for school managers/principals of innovative schools, and (iv) train innovative schools' and district education managers on effective networking.

4. The program will provide for the renewal of sanitary and hygienic infrastructure and repairs in schools. As part of repair works, the old plumbing equipment (bathrooms, sinks, partially replacement of pipes) and electrical equipment will be dismantled; floor coverings and windows will be replaced, and wooden surfaces will be painted. It should be noted that the intended Project activities will be performed at the existing facility.

5. **Environment categorization.** A safeguards assessment matrix has been prepared to evaluate potential direct or indirect environmental impacts associated with the policy actions (Outputs 1 and 2). There are no anticipated environmental impacts related to implementation of the policy actions. Based on the anticipated scope of works to be undertaken in Output 3, the program has been assessed as category B per ADB Safeguard Policy Statement (SPS), 2009. This categorization has been made on the basis that although the project includes civil works, these are relatively small scale in nature, site-specific, temporary, and will be carried out on the existing school land.

6. A draft initial environmental examination (IEE) with environmental management plan (EMP) for one school under Package CW-I-1² has been prepared based on preliminary design and in accordance with the methodology and requirements of ADB SPS, 2009. This draft IEE is a linked document to the RRP and reflects the main areas of environmental legislation, student health, legislation on sanitary standards and rules in schools, the powers of state bodies and local governments involved in environmental and sanitation management, the state of the environment, as well as the risks that may arise during construction work in a school. Consultations were held with specialists from state departments for environmental protection, disease prevention and sanitary and epidemiological supervision and an institutional analysis of the responsibility of state and local authorities for environmental safety in schools and health safety. This Draft IEE will be updated based on detailed engineering design and to include the remaining schools per scope of Package CW-I-1. The Updated IEE will be submitted to ADB for review and disclosure and will be included in the bid and contract document of Package CW-I-1.

7. It is likely that the other schools and the KAE will have similar baseline environmental conditions and scope as the sample school are thus expected to be category B. Any school or activity projected to be categorized as A (potential impacts are significant, irreversible, diverse, unprecedented, or larger than the sites or facilities subject to physical works) will not be considered for implementation under the project.

8. **Purpose of the environmental assessment and review framework.** This environmental assessment and review framework (EARF) has been prepared to guide the updating of the Draft IEE of Package CW-I-1 and preparation of the IEE for Package CW-I-2. It also specifies the detailed requirements per ADB SPS, 2009, applicable environmental laws, rules and regulations, in the event of change of locations, additional components, and/or unanticipated impacts. The EARF will be disclosed on ADB and project's websites.

□

¹ Each of 53 innovative schools will be responsible for continuous methodological support to 5–10 public schools located in proximity, thus originating 53 school clusters. Project will supply basic laboratory equipment to cluster schools. The list of clusters will be approved by MES.

² The 23 schools have been group into two civil works packages (CW-I-1 and CW-I-2). A Draft IEE has been prepared for Shopokov School No. 3, Sokuluk Village, Chui Oblast. This school is included in the 12 schools in Osh, Batken, and Jalal Abad to be rehabilitated under Package CW-I-1.

9. The EARF will be reviewed from time to time (i.e., ADB review missions) and, if necessary, updated during implementation especially if unanticipated impacts arise or if there is any change in scope or change in legal and regulatory frameworks. None of the provisions of EARF will be relaxed or lowered in the subsequent revisions and updates.

10. **Project components.** The schools were selected by the Selection Committee of the MES. The composition of the Selection Committee was approved by Order # 870/1 of MES “On the establishment of the Selection Committee within the framework of the ADB Technical Assistance” of October 16, 2020. The Committee included the Deputy Minister for School Education (Chairman), heads of the main departments of MES and senior officials of the department of school and alternative education, and the Project Implementation Unit of the ADB “Strengthening Education System Sector Development Program”.

11. The school selection process was the following: MES issued Order # 283/1 of the Kyrgyz Republic of March 23, 2021 to approve: (1) an evolved model of Innovative Schools, (2) a criteria for selecting schools to be included in the Innovative Schools network under the ADB “School Education Reform Sector Development Program’s” School Selection Procedure, and (4) a School Selection Questionnaire.

12. The selection of schools was made according to the following six criteria:

- (i) school location;
- (ii) social partnership;
- (iii) competent school management;
- (iv) teacher competencies and professional development;
- (v) learning conditions and school infrastructure; and
- (vi) adequacy of the educational process.

13. As a result of the work carried out, 23 schools recommended by the Selection Committee for repair/construction work under the SERDSP were identified. The project also provides for the modernization of the physical infrastructure of the KAE. The list of schools are shown in Table 1.

Table 1. List of Selected Schools under SERDSP

Item no.	Region, district/city of regional significance	Name of the school	Location (city/village)
Batken region			
1.	Sulyukta	School # 7 after Razakov	Sulyukta
2.	Kyzyl-Kiya district	School # 1 after D.M. Karbyshev	Kyzyl-Kiya
3.	Batken	School after Sh. Toksonov	Bujum
Jalal-Abad region			
4.	Kara-Kul	School # 3 after Frunze	Kara-Kul
5.	Tash-Kumyr district	School # 11 after M. Temirbayev	Kyzyl-Alma microdistrict
6.	Nooken district	School # 6 after S. Sharipov	Aral
7.	Jalal-Abad	School gymnasium #5 after Osmonov	Jalal-Abad
8.	Kok-Jangak	School #3 after Satylganov	Kok-Jangak
9.	Mailuu-Suu district	School # 2	Mailuu-Suu

Item no.	Region, district/city of regional significance	Name of the school	Location (city/village)
10.	Chatkal district	School after Janaliev	Jany Bazaar
Issyk-kul region			
11.	Balykchy town	School -Gymnasium №4	Balykchy town
12.	Karakol town	School -Gymnasium №11	Karakol town
13.	Ysyk-Kol district	Secondary school named K. Bektenov	Kara-Oi village
Naryn region			
14.	Naryn town	Secondary school №4 named E. Ibraev	Naryn town
15.	Ak-Talaa district	Secondary school named E. Karasartov	Ak-Talaa
16.	At-Bash district	Oy-Tersken Secondary school	Acha-Kaiyndy village
Osh region			
17.	Kara-Suu district	Secondary school №43 named Z.M.Babur	Kyzyl-Kyshtak village
18.	Uzgen district	School # 8 after Kurmanjan Datka	Uzgen
Talas region			
18.	Bakai-Ata district	Secondary school named Akchal u.Duishon	Ak-Dobo village
20.	Manas district	Secondary school named M. Rakhmanberdiev	Kyzyl-Zhyldyz village
Chui region			
21.	Alamedin district	Alamudun School # 2	Alamudun
22.	Sokuluk district	School # 3 after K. Shopokova	Sokuluk
23.	Issyk-Ata district	School Lyceum # 2 after N.S. Baranov	Novopokrovka
	The Kyrgyz Academy of Education	Bishkek, b. Erkindik d.25	Bishkek

Source: Order of the Ministry of Education and Science No. 635/1 dated 12 April 2022.

14. Scope of the civil works packages as of June 2022 are summarized in Table 2. Any school or additional component to be considered for funding under the program will be screened using the environmental considerations discussed in exclusion criteria.

Table 2: Civil Works Packages (Output 3) per SERDSP Procurement Plan

Package Number	General Description	Advertisement Date
CW-I-1	Rehabilitation of 12 schools Lot 1: 2 schools in Osh and 3 in Batken Lot 2: 7 schools in Jalal Abad	Q4 2023
CW-I-2	Rehabilitation of 11 schools and Kyrgyz Academy of Education (KAE) Lot 1: 3 schools in Chuy, 2 in Talas, and KAE Lot 2: 3 schools in Yssyk-Kul and 3 in Naryn	Q4 2023

□

15. **Exclusion criteria.** The program will not include and/or involve any activities listed in ADB's Prohibited Investment Activities List.³

16. During detailed design phase, the 23 schools and KAE will be further screened following environmental criteria in Table 3) to exclude subprojects which may cause impacts that are significant, irreversible, diverse, unprecedented, or larger than the sites or facilities subject to physical works. Activities that would directly affect environmentally sensitive areas or causing potential significant and irreversible impacts will be assessed for suitable alternatives to lessen the potential impacts.

Table 3: Exclusion Criteria for the Program

Schools that are located in the following environmentally sensitive areas
<p>New schools or components located within:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Wildlife sanctuaries <input type="checkbox"/> National parks <input type="checkbox"/> Core zone of biosphere reserves <input type="checkbox"/> Critical habitats
<p>Rehabilitation works of existing schools/facilities located in the environmentally sensitive areas (wildlife sanctuaries, national parks, core zones of biosphere reserves, critical habitats, etc.), shall be excluded if the following criteria are not met:</p> <ul style="list-style-type: none"> <input type="checkbox"/> proposed rehabilitation works will be confined to the existing footprint, and within the right of way of existing infrastructure; and <input type="checkbox"/> proposed rehabilitation works will not require any new clearance/permissions. A written confirmation to that effect from the local office of the respective protected area regulatory agency shall be obtained. <input type="checkbox"/> proposed rehabilitation work is in areas of critical habitats, it can proceed if (i) there are no measurable adverse impacts on the critical habitat that could impair its ability to function, (ii) there is no reduction in the population of any recognized endangered or critically endangered species, and (iii) any lesser impacts are mitigated. If a project is located within a legally protected area, implement additional programs to promote and enhance the conservation aims of the protected area. In an area of natural habitats, there must be no significant conversion or degradation, unless (i) alternatives are not available, (ii) the overall benefits from the project substantially outweigh the environmental costs, and (iii) any conversion or degradation is appropriately mitigated. (From page 16 of the SPS)
<p>Potential for significant adverse impacts</p>
<p>Activities or components likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented, and may affect an area larger than the sites or facilities subject to physical works (i.e. category A projects as per ADB SPS 2009) will be excluded from Livable Cities Investment Program.</p>

17. **Implementation Arrangement.** The Ministry of Education and Science (MES) will be the executing agency for both the policy-based grant and the investment project. The MES Deputy Minister responsible for school education will be the project coordinator to oversee, coordinate, and facilitate program implementation. The project implementation unit (PIU) will oversee the day-to-day operations and manage implementation, including the procurement, recruitment of consulting services, disbursement activities, and timely implementation of policy actions. The project steering committee will meet twice a year and be responsible for (i) approving the annual project budget and activity plan, (ii) reviewing and advising on implementation progress, (iii) providing strategic guidance on project implementation and advice on any need for scope adjustments, (iv) providing overall program direction and any required policy guidance, and (v) ensuring policy and other significant matters affecting implementation are dealt with promptly.

³ Appendix 5 of ADB's Safeguard Policy Statement.

18. An Environment and Safeguards Specialist to be engaged in the PIU, supported by the civil works design and supervision firm, will have the overall responsibility for compliance with ADB SPS and applicable government environmental laws, rules, and regulations, coordinating the project level grievance redress mechanism (GRM) and reporting any issues to ADB via the quarterly progress reporting process and semi-annual environmental monitoring reports.

19. The civil works contractors will be required to appoint an Environment, Health, and Safety (EHS) Staff/Engineer who will be responsible on a day-to-day basis in (i) ensuring implementation of site-specific EMP and subplans, (ii) coordinating with the PIU and environment specialist(s) of the supervision team; (iii) community liaison, consultations with interested/affected people, (iv) field-level grievance redress; and (iv) reporting.

II. POLITICAL, LEGAL AND ADMINISTRATIVE FRAMEWORK

A. National Legislation

1. Legal System and Environmental Policies and Laws

20. The environmental legislation of the Kyrgyz Republic consists of the laws and normative and legal acts (bylaws).

21. **Law “On environmental protection” (1999)** is a framework law that sets out the basic principles of environmental protection, including the need to conduct an OVOS before starting a project’s implementation.

22. **The Law “On environmental expert review” (1999)** is the main legislation on the environmental expertise to prevent negative impacts on human health and environment resulting from economic or other activities and ensure that such activities comply with the national environmental requirements. This Law is commonly used for donor development projects, which may have a certain environmental impact, including feasibility studies and projects for construction, reconstruction, development, and retrofitting. This is regardless of their estimated cost, origin or form of ownership, where implementation of such projects may have environmental impact. Pursuant to this Law, a project initiator is responsible for submitting the necessary documentation about a project and its environmental impact for the State Environmental Expert Review (SEER).

23. **The Law "General technical regulations for ensuring environmental safety in the Kyrgyz Republic" (2009)** defines the technical regulations in the field of environmental safety and establishes general requirements for ensuring environmental safety in the design and implementation of activities at economic and other work in the production, storage, transportation, and disposal of products. In accordance with this Law, a Category 4 Hazard has been assigned to this project, and *will not have any environmental impact*. With respect to the projects with an insignificant level of environmental impact, it is sufficient to complete the environmental impact statement (EIS) form at the stage of development of design estimates documentation to pass through the SEER.

24. **The Law “Technical regulation on drinking water safety” (2011)** sets out legally-binding technical regulation requirements. The objectives are to: (i) protect human health and life from the harmful effects of pollutants contained in water intended for human consumption; and (ii) prevent actions that mislead consumers when using drinking water. This Technical Regulation extends to drinking water intended to meet the needs of the population, and governs the principles, responsibilities, procedures, and organizational measures to ensure

the drinking water safety. It is applicable for legal entities and individuals engaged in economic activities (industrial, agricultural and other enterprises), and operating water supply systems.

25. **The Law “On procedure for consideration of citizens’ appeals”** is designed to ensure the legal regulation of relationships associated with the implementation of the right of anyone to appeal to government bodies and local self-government bodies, as secured by the Constitution of the Kyrgyz Republic, as well as the procedure for reviewing citizens’ appeals by government bodies, local self-government bodies, and officials.

26. **The Law “On access to information held by state bodies and local self-government bodies of the Kyrgyz Republic”** stipulates the exercise and protection of the right to access information held by state bodies and local self-government bodies. This aims to reach maximum informational openness, publicity, and transparency in activities.

2. Normative and Legal Acts

27. Framework laws establish the need to develop normative legal acts (bylaws) as follows:

28. **Sanitary and epidemiological requirements for the conditions and organization of training in general education organizations**, approved by Resolution #201 of the Government of the Kyrgyz Republic, dated April 11, 2016, are aimed at protecting the health of students in general education organizations. Sanitary rules shall be followed by general educational organizations which are designed, in-service, or under construction and reconstruction, regardless of the type or form of ownership.

29. **Construction Norms and Regulations (SNiP) of the Kyrgyz Republic 31-08: 2013 “School buildings. Design standards”** establish the basic provisions and requirements to layout and organize building configuration, land plots, territory, composition, areas of premises, utilities equipment, and the internal environment of educational institutions.

30. Within the framework of the Project “Safety of educational environment in schools of the Kyrgyz Republic”, amendments were made to the normative legal acts, which regulate the safety requirements for educational institutions in the country. The model regulation on educational organizations was supplemented, specifically the requirement to protect students’ life and health was expanded to incorporate the requirement to ensure information security and maintain the educational organizations buildings in the proper technical, sanitary, fire-fighting, environmental, architectural, and aesthetic condition.

31. **Sanitary rules and norms “Noise at Workplace, in Residential Accommodation, Public Buildings and Dwellings Zones” (2016)**, establish sanitary and epidemiological requirements, specified values and maximum allowable noise levels at workplaces, noise classification, allowable noise levels in the premises of the public buildings being developed, under construction, reconstructed and in-service, as well as in the dwelling zones.

3. Environmental Assessment Procedures

32. **The regulation “On the procedure for conducting Environmental Impact Assessment”** in the Kyrgyz Republic specifies the procedure for assessing the impact of the proposed activities on the environment (OVOS).

- (i) The purpose of OVOS is to prevent and/or mitigate the impact of the proposed activity on the environment, and the related social, economic, and other consequences.

- (ii) OVOS is carried out for the activities subject to the mandatory environmental expert review in accordance with the "General technical regulation for ensuring environmental safety in the Kyrgyz Republic" law.

33. **The procedure for environmental impact assessment.** The environmental impact assessment system in the Kyrgyz Republic consists of two main stages:

- (i) Environmental impact assessment report (which is called "OVOS" in the Kyrgyz Republic); and
- (ii) State Environmental Expert Review (SEER).

34. The environmental impact assessment (EIA) is carried out by a developer of proposed activities (an investor, initiator or applicant) or a person authorized by the developer, who is responsible for assessing the environmental impact of the activities and its proposed alternatives, as well as for preparing the relevant EIA documentation. The main tasks of the SEER are to determine and ensure control by the government bodies over compliance of the submitted EIA materials and other documents with the current legislation and environmental requirements, as well as the applicability of the proposed activities. The SEER is prepared by an authorized government body or experts of such a body, or by dedicated expert commissions.

35. An EIA consists of the following stages:

- (i) Making a decision on the need for conducting EIA;
- (ii) Conducting a preliminary EIA;
- (iii) Finalizing the EIA; and
- (iv) Post-project review.

36. Stage one determines whether it is necessary to assess the proposed activities in terms of environmental impact, including the possibility of transboundary impact. The decision is made by a project initiator based on the list of activities subject to EIA.

37. When a decision is made about whether the proposed activities are likely to have a significant adverse transboundary impact, it is necessary to refer to Appendices I and III of the United Nations Economic Commission for Europe Convention on Environmental Impact Assessment in a Transboundary Context.

38. It is compulsory to conduct a full-scale EIA for the activities attributed to Category I Hazard, as well as facilities with a possible significant harmful transboundary impact.

39. The EIA with reduced scope is applicable for the activities attributed to Categories II and III Hazards.

40. For projects with insignificant levels of environment impact, the list of which is given in Appendix 4 to this Regulation, in order to pass through a State Environmental Expert Review, is sufficient to complete the Environmental Impact Statement form for the working draft.

41. Stage 2 is conducting and writing a preliminary EIA, accompanying a feasibility study of a project, carried out for the purpose of a comprehensive analysis of the possible consequences of the project, assessment of alternatives, and the development of an environmental management plan (EMP)/program. The results of the preliminary impact assessment are documented in the EIA report form.

42. Stage 3 of an EIA process is the assessment of the environmental impact of the intended activities which results in project documentation (design, working draft). The results

of the impact assessment are reflected as “Environmental Protection” section of the project / working draft.

43. Stage 4 of the EIA is a post-project review to be performed one year after the beginning of activities to confirm the environmental safety of the project and adjust environmental protection measures. *Pursuant to the above-named Regulation, this project “Preparing the School Education Reform Sector Development Program” is attributed to Category 4 Hazard and it will not have any environmental impact. An EIA is not required.*

4. State Environmental Expert Review

44. The EIA documentation is approved by a project initiator and, as part of the project documentation, it is submitted to the State Environmental Expert for review. The State Environmental Expert Review in the Kyrgyz Republic is carried out in accordance with Regulation on the State Environmental Expert Review, as approved by Resolution #248 of the Government of the Kyrgyz Republic, dated May 7, 2014. This Regulation establishes the procedure for organizing and conducting the State Environmental Expert Review.

45. The materials submitted by an initiator and/or developer of the project for the State Environmental Expert Review shall reflect the full scope of the project and include:

- (i) An explanatory note;
- (ii) Sections of the project, with characteristics of the subject of review and process flows of the intended production, which have a direct or indirect impact on the environmental status.
- (iii) EIA documentation which corresponds to the stage of its implementation;
- (iv) Copies of favorable opinion and/or the approval documents of the relevant state bodies within their competence, if necessary; and,
- (v) Copies of the conclusions of the public environmental review, if any.

46. Based on the results of the State Environmental Expert Review, an authorized government body for environmental protection shall issue a conclusion, prepared in accordance with the form, as specified in Appendix 3 to the Regulation on the State Environmental Expert (SEE). The conclusion of the State Environmental Expert Review can be either favorable/positive or negative. The positive conclusion of the State Environmental Expert Review includes substantiated findings about the admissibility of the impact of the proposed activities on the environment and the possibility of implementing the subject of review.

47. *Pursuant to the above-named Regulation, this project “Preparing the School Education Reform Sector Development Program” is attributed to Category 4 Hazard and it will not have any environmental impact. As regards the facilities with an insignificant level of environment impact, in order to pass through a State Environmental Expert Review, it shall be sufficient to complete the Environmental Impact Statement form at the stage of drafting the Design Estimates Documentation. The engineering company is responsible for agreeing to the environmental review.*

5. Public Consultation and Information Disclosure

48. Public consultations are stipulated in the EIA Regulation (2015). Public consultations are held to raise public awareness on the issues related to the environmental protection, through meetings to discuss the EIA documentation, if communities are interested in such a discussion.

49. The period for conducting public consultations should be at least 30 calendar days from the day of notice on public consultations. Upon the meeting to discuss EIA documentation, minutes of meeting are prepared with the list of questions, comments and suggestions on the EIA documentation received during the meeting, indicating their authors and responses and the total number of participants.

50. The meetings on the EIA documentation are not held if the public has not applied to the relevant local state administrations and Local Self-Government Bodies.

Table 4. National Legislation Requirements Applicable to the Project

Requirement	Legislative act	Timing	Payment
State Environmental Expert Review (SEER)	Law on environmental protection (1999), Regulation on SEER # 248, dated May 7, 2014	The period of conducting state environmental expert review is set depending on the complexity of the subject of and shall not exceed three (3) months.	No payment required
Public consultation	Law on environmental protection, Regulation on EIA# 60, of February 13, 2015	During submission for the state expert review, before the start of the project	Funds of a project initiator

6. International Conventions and Agreements

51. The Kyrgyz Republic has ratified 13 international conventions and two (2) protocols on environmental protection and sustainable nature management. The Law “On environmental protection” guarantees the enforcement of international agreements.

52. **United Nations Economic Commission for Europe Convention on Access to Information, Public Participation in Decision-Making, and Access to Justice in Environmental Matters (Aarhus Convention).** The Kyrgyz Republic joined this Convention in 2001. This Convention gives the rights to the public regarding access to information, public participation and access to justice, participation in public decision-making processes on the issues related to the local, national and transboundary environment. It focuses on the interaction between the public and government agencies. Public participation and decision-making activities and access to information are covered by this international agreement.

7. The Kyrgyz Republic and ADB’s Environmental Quality Standards

53. **Air Quality and Vehicles Emissions** Air pollution in the Kyrgyz Republic is of great concern, mainly in urban areas. In Bishkek City, 90% of all emissions are due to vehicles. It is expected that air quality in non-urban areas is much better. Regulatory responsibility for air quality and air quality monitoring in Kyrgyz Republic is assigned to Kyrgyzhydromet (KGM) under the Ministry of Emergency Situations. Air quality monitoring stations are mainly located in settlements close to major pollution sources, specifically, the cities of Bishkek, Osh, Tokmok, Kara-Balta, and Cholpon-Ata.

54. Ambient air quality standards are shown in Table 5. Control of the impact of air pollution is carried out by the Department of Environmental Monitoring under the Ministry of Natural Resources, Ecology and Technical Supervision (MNRETS). Motor vehicle exhaust emission standards are presented in Table 6.

Table 5. Ambient Air Quality Standards
(in mg/m³, except as otherwise specified)

Pollutants	Maximum Allowable Concentration	Average Daily Concentration	Hazard Category
Total particulate matters	0.1500	0.05	3
Sulphur dioxide	0.5000	0.05	3
Carbon oxide	5.0000	3.00	4
Nitrogen dioxide	0.0850	0.04	2
Nitrogen oxide	0.4000	0.06	3
Tetraethyllead	0.0001	0.00004	1

Source: Hygienic norms, GN 2.1.6.1338-03 of the Kyrgyz Republic.

Table 6. Motor Vehicle Exhaust Emission Standards

Rpm	MPC of CO	MPC of carbons, 1/1.000.000 volume ⁻¹ for engines (No. of cylinders)	
		Up to 4	Over 4
N _{min.}	1.5	1200	3000
N _{incr.} 0.8N _{nom.}	2.0	600	1000

N_{incr.} = revolutions per minute increased, N_{min.} = revolutions per minute minimum, 0.8N_{nom.} = revolutions per minute nominal, MPC = maximum permissible concentration, RPM = Revolution Per Minute

Source: Instruction on state control of air pollutant emissions by motor vehicles in the Kyrgyz Republic.

55. National standards for measuring emissions:

- (i) GOST 17.2.2.03-87 defines the content of measuring carbon monoxide (CO) and hydrocarbons content in exhaust gases of petrol-engine vehicles, "Safety requirements",
- (ii) GOST 21393-75 deals with smoke emission from exhaust gases of diesel-engine vehicles. Safety requirements.

56. **Water quality.** Drinking water quality standards are specified in "Technical Regulation for drinking water safety: standards of drinking water quality, microbiological and chemical indicators for centralized water supply sources, for non-centralized water supply sources, and radiation safety". Surface water quality standards for the most usual parameters are shown in Table 7.

Table 7. Surface Water Quality Standards for the Most Usual Parameters

Parameter	Admissible values
pH	6-9
Dissolved oxygen (DO mg/l)	> 4
Sulfate (S mg/l)	< 250
Ammonium nitrogen (NH ₄ -NO ₃ mg/l)	< 3.3
Oil and grease	< 0.05

Source: Rules for the protection of surface waters of the Kyrgyz Republic, as amended by the Resolution of the Government of the Kyrgyz Republic of December 15, 2017, No. 813; <http://cbd.minjust.gov.kg/act/view/ru-ru/98396>

57. **Noise.** Noise standards are summarized in Table 8 according to SNiP 2.2.4/2.1.8.562-96 "Noise at Workplace, in Residential Accommodation, Public Buildings and Dwellings Zones".

Table 8. Allowable Noise Level

Activities/ categories	Equivalent Noise Level	Maximum Noise Level
Areas in the immediate vicinity to hospitals and health resorts	Daytime = 45 Night = 35	Daytime = 60 Night = 50

Activities/ categories	Equivalent Noise Level	Maximum Noise Level
Areas in the immediate vicinity to housing premises, polyclinics, health centers, vacation houses, hotels, libraries, schools, etc.	Daytime = 55 Night = 45	Daytime = 70 Night = 60
Areas in the vicinity to hotels and dormitories	Daytime = 60 Night = 50	Daytime = 75 Night = 65
Rest areas in hospitals and health resorts	35	50
Rest areas on the territories of living quarters and residential living quarters, vacation houses, health resorts, schools, senior centers, etc.	45	60

Source: Kyrgyz Republic Sanitary Norms 2.2.4/2.1.8.562-96 "Noise at Workplace, in Residential Accommodation, Public Buildings and Dwellings Zones".

8. Comparison of National Standards with International Finance Corporation (IFC) Standards

58. ADB's Safeguard Policy Statement (SPS) requires that, during the design, construction, and operation of the project, the executing agency shall apply pollution prevention and control technologies and practices that are consistent with international good practices, as reflected in internationally recognized standards, such as the World Bank Group's Environment, Health and Safety Guidelines. Table 9 shows a comparison of National Standards with IFC/World Bank Guidelines /Standards. These standards contain performance levels and measures that are normally acceptable and applicable to projects. These standards contain performance levels and measures that are normally acceptable and applicable to projects. When GOK regulations differ from these levels and measures, the PIU will apply the levels or measures whichever is more stringent. If less stringent levels or measures are appropriate in view of specific project circumstances, the PIU will provide full and detailed justification for any proposed alternatives that are consistent with the requirements presented in ADB's SPS.

Table 9. Comparison of National Standards with IFC/World Bank Guidelines /International Standards

Topic	National Standards / Requirements	IFC/World Bank Guidelines /International Standards	Adopted Project Standard	Remarks
Noise limits for human protection	Acceptable noise levels based on receptors in Kyrgyz National SN (Sanitary Norms) 2.2.4/2.1.8.562-96 "Noise at workplaces, in dwelling rooms, in public buildings and at the area of residential	IFC Environmental, Health, and Safety General Guidelines Noise Management Residential; institutional; educational Daytime: 55 LAeq Night-time: 45 LAeq	Hospitals and sanatoriums Daytime: 45 LAeq Night-time: 35 LAeq Dwellings, polyclinics, dispensaries, rest homes, holiday hotels, schools Daytime: 55	Kyrgyz noise level standards given at Kyrgyz National SN (Sanitary Norms) 2.2.4/2.1.8.562-96 "Noise at workplaces, in dwelling rooms, in public buildings and at the area of

Topic	National Standards / Requirements	IFC/World Bank Guidelines /International Standards	Adopted Project Standard	Remarks
	<p>development Hospitals and sanatoriums Daytime: 45 LAeq Night-time: 35 LAeq Dwellings, polyclinics, dispensaries, rest homes, holiday hotels, schools Daytime: 55 LAeq Night-time: 45 LAeq Hotels and dormitories Daytime: 60 LAeq Night-time: 50 LAeq Recreational areas in hospitals and sanatorium: 35 LAeq Rest areas at the territories of micro-districts and building estates, rest houses, sanatoriums, schools, homes for the aged: 45 LAeq</p>	<p>Industrial; commercial Daytime: 70 LAeq Night-time: 70 LAeq</p>	<p>LAeq Night-time: 45 LAeq Hotels and dormitories Daytime: 60 LAeq Night-time: 50 LAeq Recreational areas in hospitals and sanatorium: 35 LAeq Rest areas at the territories of micro-districts and building estates, rest houses, sanatoriums, schools, homes for the aged: 45 LAeq</p>	<p>residential development are as most stringent standard.</p>
Vibration due to construction	<p>Acceptable vibration levels based on categories in Kyrgyz Republic Standards Maximum permissible values (Corrected and equivalent corrected values and their levels) Residential premises, wards of hospitals, sanatoriums:</p>	<p>USA, Federal Transit Administration Vibration Limits Reinforced-concrete, steel, or timber (no plaster) 0.0127 m/s</p>	<p>Acceptable vibration levels based on categories in Kyrgyz Republic Standards Maximum permissible values (Corrected and equivalent corrected values and their levels) Residential premises, wards of hospitals,</p>	<p>Kyrgyz vibration level standards are as most stringent.</p>

Topic	National Standards / Requirements	IFC/World Bank Guidelines /International Standards	Adopted Project Standard	Remarks
	Vibration acceleration: 4 m/s ² 10-3 Vibration velocity: 0.11 m/s 10-3 Administrative premises and in public buildings: Vibration acceleration: 10 m/s ² 10-3 Vibration velocity: 0.28 m/s 10-3		sanatoriums: Vibration acceleration: 4 m/s ² 10-3 Vibration velocity: 0.11 m/s 10-3 Administrative premises and in public buildings: Vibration acceleration: 10 m/s ² 10-3 Vibration velocity: 0.28 m/s 10-3	

Source: Environmental, Health, and Safety (EHS) Guidelines; and General EHS Guidelines and National Standards of the Kyrgyz Republic.

9. National Responsible Agencies

59. The Kyrgyz Republic has the institutional structure established for the implementation of environmental protection tasks. The Cabinet of Ministers governs the ministries and agencies. A sector of non-governmental organizations has also been formed. The Kyrgyz Government has empowered specific government agencies for coordinating actions and ensuring compliance with international commitments. The functions of the MES in relation to the SERDSP include:

- (i) assistance with design, renovation of educational organizations falling within the jurisdiction of the Ministry; and
- (ii) support for educational organizations to perform routine repairs and logistics support.

60. **Ministry of Natural Resources, Ecology and Technical Supervision is the lead environmental government agency.** The Ministry has the following functions:

- (i) development of environmental policy and its implementation;
- (ii) carrying out the State Environmental Expert Review;
- (iii) issuance of environmental licenses;
- (iv) environmental monitoring;
- (v) provision of environmental information services.

61. **Department of Disease Prevention and State Sanitary and Epidemiological Surveillance (DPPSSES) at the Ministry of Health of the Kyrgyz Republic** supervises sanitary and epidemiological wellbeing of the population, safety of goods, products, environmental components and conditions, prevention of the harmful effects of environmental factors on human health. The Department of Disease Prevention and State Sanitary and Epidemiological Surveillance develops MACs for chemicals in the environment, taking into account health safety issues.

62. **State Agency for Architecture, Construction, Housing and Public Utilities under the Government of the Kyrgyz Republic (SAACHPU)** is an authorized government body

that performs the functions of an executive body in the field of architecture, construction and housing, and utilities services. The SAACHPU also supervises state-level construction works.

63. **Local Self-Government Bodies (LSGB).** The activities of Local Self-Government Bodies are regulated by the Law “On Local Self-Government”. The Law establishes the principles of organizing local government at the level of administrative and territorial units of the Kyrgyz Republic, defines the role of local self-government in the exercise of public power, establishes the organizational and legal framework for their activities, establishes the scope of responsibility and principles of relations between local self-government bodies. The tasks of LSGB, as applicable to the Project, include:

- (i) Drinking water supply to communities;
- (ii) Maintenance of the sewage system and treatment facilities in settlements;
and,
- (iii) Development and implementation of the environmental protection measures.

B. Asian Development Bank

64. **Safeguard Policy Statement (2009).** SPS 2009 is ADB’s current and primary safeguards policy document. It describes the common objectives and policy principles of ADB safeguards and outlines the delivery process for ADB safeguard policy. It promotes sustainability through protection of people and the environment from the adverse impacts of projects, and by supporting strengthening of country safeguard systems. It presents a consistent, consolidated framework for environment, resettlement, and indigenous people safeguards.

65. The **Access to Information Policy (2018)** guides ADB’s efforts to be transparent and accountable to the people it serves, which it recognizes are essential to development effectiveness. The policy recognizes the right of people to seek, access, and impart information about ADB’s operations, and it aims to enhance stakeholders’ trust in and ability to engage with ADB, through clearly stated principles including proactive disclosure, presumption in favor of disclosure, recognition of the right to access and impart information and ideas, country ownership, limited exceptions, and the right to appeal.

66. **ADB Operations Manual, Safeguard Policy Statement, Section F1/BP (Bank policies) and Safeguard Review Procedures, Section F1/OP (operational procedures) (2013).** These documents operationalize SPS 2009. The policy sets out the scope of SPS 2009 applicability to ADB operations, and the procedures describe the safeguards process and outputs, including consultation and disclosure requirements, through the various stages of project preparation.

67. For this project, the SPS requires:

- (i) Screening using a rapid environmental assessment (REA) checklist;
- (ii) Use of selection criteria that exclude subprojects with potential high impacts;
- (iii) Environmental categorization of the project, and rejection if category A;
- (iv) Preparation of both an Initial Environmental Examination and an Environmental Management Plan if category B;
- (v) Consideration of physical cultural resources including chance finds;
- (vi) Public disclosure of project plans, designs and impacts;
- (vii) Consultation and participation with all stakeholders, especially those directly affected;
- (viii) Establishment and operation of an accessible and effective Grievance Redress Mechanism (GRM);

- (ix) Consideration of occupational safety and health (OSH) at all stages of project planning and implementation;
- (x) Making provision for management of unanticipated environmental impacts; and,
- (xi) Use of international best practices for pollution prevention.

68. **Screening and Categorization.** ADB projects and subprojects are screened using a rapid environmental assessment checklist. The checklist captures the type, location, sensitivity, scale, nature, and magnitude of potential environmental impacts, and availability of cost-effective mitigation measures. Based on the checklist findings, a proposed project or subproject is assigned to one of the following ADB environmental categories:

- (i) **Category A:** Likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the sites or facilities subject to physical works. An EIA, including an environmental management plan (EMP), is required;
- (ii) **Category B:** Potential adverse environmental impacts are site-specific, few if any of them are irreversible, and in most cases mitigation measures can be designed more readily than for category A projects. An Initial Environmental Examination (IEE), including an EMP, is required;
- (iii) **Category C:** A proposed project is likely to have minimal or no adverse environmental impacts. An EIA or IEE is not required, although environmental implications need to be reviewed.

69. To determine the environmental category of the project, a checklist for a rapid environmental assessment (REA) of the Output 3 based on one school under Package CW-I-1 was prepared.⁴ Results of the REA show that although the project includes civil works, these are relatively small scale in nature, site-specific, temporary, and will be carried out on the existing school land. The civil works for the remaining schools are the same or lesser scope thus the impacts are expected to be of same scale, magnitude and duration. Thus, the project is considered as Category B for environment per ADB SPS.

70. **Environmental Audit of Existing Facilities.** For subprojects involving facilities that already exist or are under construction or proposed, environmental compliance audit will be conducted as part of the detailed design. The environmental audit will include on-site assessment to identify past or present environmental concerns, whether actions were in accordance with ADB's safeguard principles and requirements for executing and implementing agencies and identify and plan appropriate measures to address outstanding compliance issues. A corrective action plan in the IEEs will be agreed on by ADB and PIU. The plan will define the necessary remedial actions, the budget for such actions, and the timeframe for resolution of non-compliance. The environmental audit report (including the corrective action plan, if any) will be made available to the public in accordance with the information disclosure requirements of ADB SPS. If a subproject involves an upgrade or expansion of existing facilities that has potential impacts on the environment, the requirements for environmental assessments and planning specified in the EARF will apply in addition to compliance audit.

71. **Physical Cultural Resources (PCR).** ADB SPS environmental safeguard policy principles require conservation of physical cultural resources and avoid destroying or damaging them by using field-based surveys employing qualified and experienced experts during environmental assessment. It also emphasizes the use of chance find procedures that include a pre-approved management and conservation approach for materials that may be

⁴ Shopokov School No. 3, Sokuluk Village, Chui Oblast.

discovered during project implementation. There are no existing PCRs near or adjacent to the schools under the project.

72. Initial Environmental Examination and Environmental Management Plan (EMP). IEEs, which include EMPs, will be prepared for each subproject. The level of detail and complexity of the EMP and the priority of the identified measures and actions will be commensurate with the project's impact and risks. A copy of the EMP or approved site-specific EMP (SSEMP) will be always kept on-site during the construction period. Non-compliance with, or any deviation from, the conditions set out in the EMP or SSEMP constitutes a failure in compliance and will require corrective actions. IEE will be prepared for each package and will be included in the bidding and contract documents.

73. Public disclosure. ADB will post the safeguard documents on its website as well as disclose relevant information in accessible manner in local communities:

- (i) for environmental category A projects, draft EIA report at least 120 days before Board consideration;
- (ii) final or updated EIA and/or IEE upon receipt; and
- (iii) environmental monitoring reports submitted by the implementing agency during project implementation upon receipt.

74. Consultation and participation. Meaningful consultation shall be carried out with affected people and other concerned stakeholders including civil society and facilitate their informed participation. The consultation process and its results are to be documented and reflected in the environmental assessment report. Consultations have been conducted during preparation of the Draft IEE of Shopokov School No. 3, Sokuluk Village, Chui Oblast. Further consultations and stakeholders engagement will be undertaken during updating of the Draft IEE of Package CW-I-1 and preparation of IEE of Package CW-I-2.

75. Grievance redress mechanism. The PIU shall establish a mechanism to receive and facilitate resolution of affected people's concerns, complaints and grievances about the subproject's environmental performance. The grievance mechanism shall be scaled to the risks and adverse impacts of the subproject.

76. Occupational health and safety. ADB requires that the borrowers ensure that the workers are provided with a safe and healthy environmental, considering risks inherent to the sector and specific classes of hazards in the subproject areas including physical, chemical, biological and radiological hazards.

77. Unanticipated environmental impacts. Where unanticipated environmental impacts become apparent during the implementation, The PIU shall update the IEEs to assess the potential impacts, evaluate the alternatives and outline mitigation measures and resources to address those impacts.

78. ADB SPS international best practice requirements. Following requirements of ADB SPS, the PIU shall apply pollution prevention and control technologies and practices consistent with international good practice. When the Government of Georgia regulations differ from these levels and measures, PMU shall achieve whichever is more stringent. If less stringent levels or measures are appropriate in view of specific subproject circumstances, The PIU will provide full and detailed justification for any proposed alternatives that are consistent with the requirements presented in ADB SPS.

III. ASSESSMENT OF ENVIRONMENTAL IMPACTS

A. Potential Impacts

79. All the schools and KAE are located on the existing land and no additional land will be required. These are located outside the protected areas, nature reserves or the areas of special national, regional or local environmental significance. The probability of the existence of species diversity of fauna and flora on the territory of schools, including those included in the Red Book of the Kyrgyz Republic, is very low or none. There are no known PCRs, historical and cultural protected resources near schools. There are no surface water bodies.

80. The potential environmental impacts of the program have been assessed based on the ADB REA checklist (Appendix 1) and draft IEE of Shopokov School No. 3, Sokuluk Village, Chui Oblast under Package CW-I-1. The activities described in the succeeding paragraphs are indicative of the physical works involved in each school. These will be carried out in a limited area and indoors, and will not affect the landscape.

81. Dismantling works:

- Dismantling floor coverings: wooden, linoleum and ceramic tiles;
- Dismantling electrical network and lighting fixtures
- Dismantling wooden structures, including doors, window frames;
- Dismantling sanitary appliances, washbasins and sinks, toilet bowls;
- Dismantling metal structures;
- Cleaning walls from plaster, paint
- Manual cleaning of the surface of the oil painted wooden floors
- Dismantling brick walls and partitions
- Dismantling small concrete structures at the entrance

82. General construction works:

- Laying of electrical cable;
- Finishing works inside schools: plastering, painting, facing walls, ceilings and other surfaces;
- Laying sewerage and water pipelines of high density polyethylene pipes;
- Floor covering: cement works, covering with linoleum;
- Construction of new ramps for children with health limitations;
- Installation of appliances: sinks, toilets, taps, valves and other check valves;
- Works with metal structures (welding);
- Laying trenches for drinking water and sewerage pipelines up to 2 m without fastenings with slopes;

83. Other repairs inside and outside the school buildings on the territory, without affecting the territory that is not reserved for the school.

84. Based on the draft IEE, construction and operation are the two activities in which the project interacts physically with the environment. Table 10 provide a summary of potential negative environmental impacts which may arise during implementation of the program and general measures to avoid, minimize, and mitigate those impacts to acceptable levels. These are indicative impacts and will need to be further explored during detailed engineering design phase of each school and the KAE.

Table 10. Potential Impacts and Mitigation Measures

Aspect	Impact	Significance (No Mitigation Scenario)	Mitigation Measures
Pre-Construction Phase			
Permits and Clearances – government agencies	<ul style="list-style-type: none"> • Non-compliance if not obtained prior to award of contracts 	<ul style="list-style-type: none"> • Significant delay in start-up but can be avoided 	<ul style="list-style-type: none"> • Ensure to obtain all statutory permits and clearances at the earliest possible and prior to award of contracts • Ensure conditions related to execution of works are informed to the contractor and requirements are duly incorporated in relevant project documents
Permits and Clearances – contractor-related	<ul style="list-style-type: none"> • Non-compliance if not obtained • Delay in implementation (no permit, no site preparation/civil works) 	<ul style="list-style-type: none"> • Significant delay in execution of works but can be avoided 	<ul style="list-style-type: none"> • Ensure contractor is provided with list of permits and clearances required • Ensure contractor has obtained all permits and clearances at the earliest possible and prior to start of works • Ensure conditions related to execution of works duly incorporated in relevant project documents
Updating of IEE of CW-I-1	<ul style="list-style-type: none"> • Incomplete actions to avoid and mitigate impacts for remaining schools • Required contractual provisions not included in bidding and contract documents • Insufficient resources/budget to implement avoidance and mitigation measures • Non-compliance with ADB SPS • If asbestos is found on-site, insufficient measures and 	<ul style="list-style-type: none"> • Significant if contractor fails to include resources or implement avoidance and mitigation measures during execution of works • Significant if asbestos is found on-site and not included in the IEE, EMP, contractors qualifications, and costs 	<ul style="list-style-type: none"> • Update the Draft IEE to include remaining schools and based on detailed design • Consider timing of Updated IEE submission, clearance/approval with procurement phases such as issuance of bid, bid evaluation, and contract award • Provide information to bidders on environmental, health and safety requirements per ADB SPS and national laws and regulations

Aspect	Impact	Significance (No Mitigation Scenario)	Mitigation Measures
	requirements to manage		
Preparation of IEE of CW-I-2	<ul style="list-style-type: none"> • Non-compliance with ADB SPS • Delay in bidding, contract award, disbursement, and/or implementation • See impacts mentioned in updating of IEE of CW-I-1 	<ul style="list-style-type: none"> • May delay package implementation • Significant if contractor fails to include resources or implement avoidance and mitigation measures during execution of works • Significant if asbestos is found on-site and not included in the IEE, EMP, contractors qualifications, and costs 	<ul style="list-style-type: none"> • Prepare IEE in parallel with detailed engineering design to ensure avoidance measures are incorporated • Consider timing of IEE submission, clearance/approval with procurement phases such as issuance of bid, bid evaluation, and contract award • Provide information to bidders on environmental, health and safety requirements per ADB SPS and national laws and regulations
Site-specific EMP per package	<ul style="list-style-type: none"> • Unsatisfactory or not applicable measures submitted by contractor 	<ul style="list-style-type: none"> • Significant but can be avoided 	<ul style="list-style-type: none"> • Require contractor to prepare site-specific EMP (SEMP) upon mobilization • Ensure contractor's personnel on environment, health and safety are mobilized at the earliest possible and coordinate with PIU on specific requirements, sites, permits and clearances • Actively engage PIU, consultants and contractor in the verification and finalization of the SEMP • Ensure SEMP is applicable, practical and provided with budget • Ensure supervision consultants prepare monitoring checklists based on SEMP and copies are provided to contractors for coordination during implementation.
Pre-works photo-documentation	<ul style="list-style-type: none"> • Unsatisfactory reinstatement of disturbed sites/areas including but not limited to public 	<ul style="list-style-type: none"> • Significant but can be mitigated 	<ul style="list-style-type: none"> • Contractor to submit to PIU

Aspect	Impact	Significance (No Mitigation Scenario)	Mitigation Measures
	facilities, access roads, etc. <ul style="list-style-type: none"> • 		
Construction phase			
Ambient Air	<ul style="list-style-type: none"> • increased air pollution due to project construction and operation. • Dust during demolition work • If asbestos is present on-site, air-borne particles that can affect the workers and people on-site (students, teachers, nearby residences) 	<ul style="list-style-type: none"> • If no asbestos on-site, repair work will be carried out not only inside the school building, but also outside: (i) repair of drinking water and sewerage pipelines, and (ii) possibly repair or re-build outdoor toilets that are located outside and have septic tanks. Emissions to the atmosphere will be from works: (i) work of motor vehicles, construction equipment; (ii) welding, insulation, finishing works; (iii) stone and concrete works; and (iv) excavation/dismantling. The potential impacts are temporary, site-specific, and short in duration. • If with asbestos on-site, significant and long-term impacts on workers and communities but can be managed by contractual obligations and asbestos management plan. 	<ul style="list-style-type: none"> • Prohibit burning of wastes at construction site • Spray water on areas where there will be dismantling and concreting works • Reduce dust level by water spraying during earthworks • Cover trucks delivering construction materials • Limit speed of vehicles when passing through communities/residential areas to avoid dust and increase in air pollutants • Maintain equipment and machinery in line with the requirements of the manufacturer operating documents. • Do not allow contractors vehicles/trucks/equipment that are not compliant with standards for emissions.
Noise	<ul style="list-style-type: none"> • Increase in noise level 	<ul style="list-style-type: none"> • Within the local area of the school. Only during construction. The 	<ul style="list-style-type: none"> • Schedule noise-producing activities during time when there are no classes

Aspect	Impact	Significance (No Mitigation Scenario)	Mitigation Measures
		potential impacts are temporary, site-specific, and short in duration.	<ul style="list-style-type: none"> • Prohibit noise-producing activities near adjacent properties/residences, if any • Inform students, teachers, residents adjacent to schools of the activities and timing, and consider their views in the schedule and work methodology • Comply with the requirements of SNiP 2.2.4/2.1.8.562-96 "Noise at Workplace, in Residential Accommodation, Public Buildings and Dwellings Zones"
Areas used by contractors	<ul style="list-style-type: none"> • Contamination of area • Deterioration of areas used during construction (such as but not limited to workers camps, borrow pits, quarries, public facilities, etc.) 	<ul style="list-style-type: none"> • Moderately significant but can be addressed by contractual obligations and specific measures in the SEMP. 	<ul style="list-style-type: none"> • Ensure proper selection of sites for construction camp • Provide proper sanitation facilities for workers (separate toilet facilities for workers and should not be allowed to use school toilets) • Prohibit washing of equipment and machinery on the construction site; • Carry out refueling of vehicles at specialized fuel stations. • Clean-as-you-go on daily basis • Segregate wastes and dispose properly to designated area(s) • Restore and reinstate areas to pre-works or better conditions
Construction and municipal waste	<ul style="list-style-type: none"> • Deterioration of schools and surrounding areas • Visual impacts • Unsafe conditions for workers, students, teachers, and other people in 	<ul style="list-style-type: none"> • Moderately significant but can be addressed by contractual obligations and specific measures in the SEMP. • If asbestos or other hazardous wastes are present on-site, significant 	<ul style="list-style-type: none"> • Identify disposal sites and obtain required permits/clearances • Segregate wastes and provide proper temporary storage (if needed) for recyclables • Educate workers and strictly prohibit throwing of wastes at construction site or its adjacent areas

Aspect	Impact	Significance (No Mitigation Scenario)	Mitigation Measures
	<p>the area and adjacent vicinities</p> <ul style="list-style-type: none"> • poor sanitation and solid waste disposal in construction camps and work sites, and possible transmission of communicable diseases (such as STIs and HIV/AIDS) from workers to local populations 	<p>impacts but can be addressed by contractual obligations and asbestos/hazardous wastes management plan.</p>	<ul style="list-style-type: none"> • Determine schedule for removal of wastes and route to be used up to disposal site • Ensure all disposal activities are properly recorded/documented • Remove all construction-related materials after completion of works • Restore and reinstate areas to pre-works or better conditions
Hazardous waste	<ul style="list-style-type: none"> • If asbestos is present and will be dismantled (roof of the building, water pipes are possible when they are replaced), will cause occupational health and safety impacts • If hazardous materials and/or existing wastes on-site requiring demolition/dismantling or transfer, will cause occupational health and safety impacts • Health impacts and safety risks to students, teachers, parents, and/or adjacent residents/businesses 	<ul style="list-style-type: none"> • Significant impacts but can be addressed by contractual obligations and asbestos/hazardous wastes management plan. 	<ul style="list-style-type: none"> • Conduct site-assessment and inventory during detailed engineering design phase • Prepare asbestos management plan and include in bidding and contract document; require contractor to update the asbestos management plan (AMP) according to site-specific conditions, requirements by government, and international-best practices • Include the ADB's Good Practice Guidance for the Management and Control of Asbestos: Protecting Workplaces and Communities from Asbestos Exposure Risks (https://www.adb.org/publications/good-practice-management-control-asbestos) in the bid documents for guidance of the contractors in preparing/updating the AMP. • Prepare hazardous wastes management plan and include in bidding and contract document; require contractor to update the asbestos management plan

Aspect	Impact	Significance (No Mitigation Scenario)	Mitigation Measures
			according to site-specific conditions, requirements by government, and international-best practices
Occupational and community health and safety	<ul style="list-style-type: none"> • Potential exposure of workers during construction activities to: (i) air emissions of dust, welding fumes, solvents used in the application of paints, resins, and similar substances, cement; (ii) danger of cuts, fractures, and other types of injuries when using construction equipment, (iii) danger when handling hazardous waste; (iv) consumption of contaminated water, violation of the rules of sanitation and hygiene can lead to gastrointestinal poisoning, (v) risk of electric shock. • Infectious diseases such as COVID-19 	<ul style="list-style-type: none"> • Moderately significant but can be addressed by contractual obligations and specific measures in the SEMP. 	<p>Require contractor to employ qualified Health and Safety Officer</p> <ul style="list-style-type: none"> • Prepare package-specific Health and Safety as part of the SEMP • Provide regular trainings and tool box talks to workers • Provide appropriate medical facilities for workers • Educate workers on daily hazards and work-related illnesses and how these can be prevented • Provide engineering and administrative measures in addition to work-appropriate personal protective equipment (PPEs) • Impose no PPE, no work policy • Provide information boards and signs informing the workers on the work rules and regulations (translate to local language for better understanding of workers) • Install appropriate temporary/permanent barriers and warning signs • Prohibit students and unathourzed person in and near the sites • Keep a register of appeals and complaints of students, teachers, parents and/or community. • Conduct lectures for teachers and students on observance of safety
Sensitive receptors	<ul style="list-style-type: none"> • There may be disturbance to sensitive receptors such as students, 	<ul style="list-style-type: none"> • Potential foreseeable environmental issues associated with small/medium 	<ul style="list-style-type: none"> • Identify sensitive receptors prior to start of construction • Use construction method and schedule that is

Aspect	Impact	Significance (No Mitigation Scenario)	Mitigation Measures
	teachers and surrounding residences and businesses.	scale community activities will be minimal and limited to temporary inconvenience resulting from construction activities.	appropriate for such sensitive receptors and/or locations <ul style="list-style-type: none"> Limit work hours as needed
Operation Phase			
Air pollutant emissions in operation of an individual boiler house (if to be installed in schools)	<ul style="list-style-type: none"> Emissions of pollutants into the atmosphere in the presence of an individual boiler house 	<ul style="list-style-type: none"> Moderately significant if not managed by school administrator or operator 	<ul style="list-style-type: none"> Ensure the use of environmentally acceptable fuel; Regular maintenance of the boiler house. Obtain all permits and certificates in accordance with the requirements of fire safety and monitoring of air emissions / concentrations
Municipal solid waste generation	<ul style="list-style-type: none"> Increase in waste generation Visual impacts Unhealthy environment for school students, teachers and parents 	<ul style="list-style-type: none"> Moderately significant if not managed by school administrator or operator 	<ul style="list-style-type: none"> implement waste segregation Dispose wastes that cannot be recycle or reused to designated areas Educate students, teachers, and parents on waste segregation Provide appropriate waste bins and strictly impose waste management controls such as throwing of wastes or garbage in designated bins ;
Liquid waste generation (sewage from toilets)	<ul style="list-style-type: none"> Smell/odor issues Health issues 	<ul style="list-style-type: none"> Moderately significant if not managed by school administrator or operator 	<ul style="list-style-type: none"> Regularly clean the toilets Coordinate with local sewage contractor for regular desludging of septic tanks/toilets

Source: Asian Development Bank (Central and West Asia Department)

85. Mitigation measures will be developed to reduce all negative impacts to acceptable levels. These will be discussed with environment, social safeguard, and technical specialists responsible for the detailed engineering design aspects.

86. **Risks of asbestos-containing materials (ACM) and mercury.** Asbestos-containing materials (ACM) wastes may be generated during the replacement of a drinking water pipeline or sewer, and mercury-containing fluorescent lamps during the replacement of electricity systems in schools. ACMs will not be used for the new facilities.

87. In case ACMs will need to be dismantled or removed and avoidance may not be possible, ACM conditions will be assessed before it is subjected to any disturbance or removal to check whether it is in friable form or in a condition in which it can release fibers.

88. The PIU will discuss with the contractor the appropriate measures required to identify hazards, use of proper safety gear and disposal methods necessary to avoid health impacts on workers and people living close to work sites.

89. If asbestos is found in schools during the detailed engineering design phase, PIU will engage an asbestos management expert to prepare the outline asbestos management plan (AMP) following ADB's Good Practice Guidance for the Management and Control of Asbestos: Protecting Workplaces and Communities from Asbestos Exposure Risks. The bidding and contract documents will include provisions on ACM management including the outline AMP. The contractors will be required to prepare a detailed AMP based on site-specific conditions as part of the SEMP. The costs for sampling and analysis during detailed engineering design will be included in Package CS-Ind-4. During construction, the contractor shall include the cost in the contract package for the cost of implementation of the detailed AMP.

90. **Impacts to sensitive receptors and surrounding communities.** The civil works are primarily located in built-up areas and surroundings where there are various types of sensitive receptors. Repair work at the school will be carried out during school holidays, or at other times outside of school hours. There may be disturbance to sensitive receptors such as students, teachers and surrounding residences and businesses and they may be negatively impacted from construction dust, noise, access blockage and safety risk. The sensitive receptors need to be identified prior to start of construction, specific measures to be put in place, including adoption of construction method and schedule that is appropriate for such sensitive receptors.

91. **Impacts due to COVID-19 pandemic.** Disinfection and containment will follow WHO's interim guidance on water sanitation, hygiene and waste management for the COVID-19 virus and to be considered in the detailed engineering design to avoid and reduce risks of diseases or illnesses to the workers and the community. The contractor will be required to train the workers on sanitation and hygiene risks and practices to avoid and minimize the exposure of the work area and the community to biological hazards. Focus should also be given on ventilation in indoor spaces, masking, and physical distancing. Special attention should be paid to eating – if possible, workers should eat outdoors, in a well-ventilated indoor space, or at different times.

IV. ENVIRONMENTAL ASSESSMENT METHODOLOGY FOR REMAINING SCHOOLS

92. It is assumed that the remaining 12 schools in Package CW-I-1 and scope of Package CW-1-2 will be of the same scale and similar nature of civil works. However, to ensure potential environmental impacts are identified, avoidance measures are incorporated in the design, and mitigation measures are planned and budgeted, the following are to be implemented:

- Prior to updating of Draft IEE of Package CW-I-1, prepare the REA Checklist (Appendix 1) and confirm potential impacts have been fully assessed.
- Prior to preparing the IEE of Package CW-I-2, complete the REA Checklist to identify the scope of the IEE. Follow ADB SPS Annex 1 of Appendix 1 for the outline and content of the IEE.
- Coordinate with the team in charge of the detailed engineering design on avoidance measures and provide justification if such measures cannot be implemented.
- Assess presence of ACMs and/or hazardous materials on site and prepare specific management plans to be included in the bidding and contract documents.

management. Ensure these requirements are discussed with the bidders and considered during bid evaluation process.

- Conduct meaningful consultations and engage the stakeholders as part of the updating of the Draft IEE of CW-I-1 and preparation of the IEE of CW-I-2. Engineering. Ensure views and concerns of the stakeholders are considered in the detailed engineering design, IEEs, and contractors SEMP and its subplans.
- Ensure to include the IEEs based on detailed engineering designs on the bid and contract documents
- Ensure required contractors personnel in charge of environment, health and safety are mobilized at the earliest possible time
- Require contractor to obtain construction-related permits and clearances upon mobilization
- Require contractor to submit SEMP for each site (as the conditions will vary according to each school site)
- PIU to verify applicability of each measure and sufficiency of budget as part of the review and clearance of the SEMP
- Ensure disclosure of information in language and form understandable by stakeholders and affected people in and adjacent to the project areas.
- Continuously assess impacts during execution of works and in even of unanticipated/unrecorded impacts, prepare due diligence report for submission to ADB for further guidance on necessary assessment and actions.

93. During updating of the Draft IEE of CW-I-1 and preparation of the IEE of CW-I-2, the PIU environmental officer will, among others:

- Collect and analyze data on existing environmental conditions, presence and condition of the sites, site preparation requirements, ACMs/hazardous materials, sensitive receptor and nearest residences/business infrastructure;
- Based on the detailed engineering design, identify potential environmental and social impacts;
- Coordinate with the team in charge of the detailed engineering design on avoidance measures
- Organize and conduct consultations and stakeholders engagement activities
- Be responsible for completeness of provided environmental data.
- Be over-all in charge in updating the Draft IEE and preparation of the new IEE and ensure requirements of ADB SPS and applicable national laws and legislations are considered;
- Include the respective IEEs in bidding and contract packages
- Ensure relevant environmental, health and safety requirements and costs are incorporated in non-civil works packages.

94. The detailed engineering design of each school will be prepared by a Design Company as employed/appointed by the PIU. In coordination with the PIU, the Design Company will, among others:

- Conduct infrastructure and school building condition survey, including assessment of ACM and hazardous materials/wastes present on sites;
- Develop the detailed engineering design and share with PIU relevant information to be included in the IEEs per ADB SPS, and
- Based on the results of the technical detailed design of the project, prepare the Environmental Impact Statement of (EIS) to obtain the relevant permits and clearances per national laws, rules, and regulations;
- Submit the detailed design of the project and the EIS for the state environmental expert's review (SEER) and receives its findings;

- Deliver to the PIU the detailed design of the project as agreed with the environmental protection agency and findings of the SEER
- Provide additional information as may be required in the IEEs and EIS

95. Costs related to environmental safeguards (Table 11) is indicative and based on preliminary information. The costs specific to each school and contractors will be reflected in respective IEEs of CW-I-1 and CW-I-2.

96. The contractor has to take fully account of the EMP specifications and shall bear all the costs for its implementation. As such, the contractor will make a provision in its financial proposal for all costs incurred by the necessary measures to avoid, reduce or compensate all environmental impacts due to execution of works. The contractors will be required to allocate budget and contingencies to ensure the contractual provisions and measures related to environmental health and safety are fully implemented. In the event that additional measures not in the IEEs or due to unanticipated impacts, PIU shall ensure that contractors are provided with written notices and funds as needed.

97. The environmental costs include the staff costs of International Environmental Specialist and Local Environmental Specialist of PIU, EHS Officer of Construction Contractor. Total cost of the staff for the implementation of mitigation measures amounts \$ 99,610 for the whole project construction period.

Table 11: Indicative Costs for Environmental Safeguards

Activity	Estimated Costs	Source of Funds	Remarks
Personnel			
PIU Environment and Safeguards Specialist	-	Package CS-Ind-4	until project completion report is issued
Environment Specialist in the civil works design and supervision firm	-	Package CS-F-1	to be mobilized early until preparation of post-construction audit report
Contractors Environment Officer		Package CW-I-1 Package CW-I-2	Until defects notification period
During Detailed Engineering Design Phase			
Instrumental monitoring for baseline environmental conditions	\$1,500/school	Package CS-Ind-4	Minimum parameters: air quality (PM10, SOx, NOx, dust, and others as required in national rules and regulations) and noise levels
ACM and other hazardous materials characterization	to be determined during site-specific assessment and detailed engineering design of each school	Package CS-Ind-4	Refer to ADB's Good Practice Guidance for the Management and Control of Asbestos: Protecting Workplaces and Communities from Asbestos Exposure Risks.
Consultations, information disclosure,	-	Package CS-Ind-4	cost included as tasks in Updating Draft IEE of Package CW-I-1 and

Activity	Estimated Costs	Source of Funds	Remarks
establishment of GRM			preparation of IEE of Package CW-I-2
Permits and Clearances (OVOS)	-	Package CS-Ind-4	
Construction Phase			
Construction-related permits/clearances	-	to be included in contractor's costs	to be obtained prior to start of works
Preparation of SEMP	-	to be included in contractor's costs	SEMP to be submitted to PIU prior to start of works
Instrumental monitoring	-	Package CS-Ind-4 Package CS-F-1	Civil works are small-scale in nature, site-specific, and short in duration thus not expected to cause significant increase in levels of air quality parameters. Instrumental monitoring requirements will be evaluated based on each school's SEMP. The contractor will be required to strictly implement dust suppression measures and housekeeping. There are no water bodies in nor adjacent to the sites. Visual monitoring will be conducted.
Noise level monitoring	costs for noise meters	to be included in contractor's cost	Noise-producing activities will be limited to hours when there will be least disturbance to students and/or other receptors. Contractor will be required to monitor noise levels on-site on daily basis (before start of works and several intervals during works).
Occupational and community health and safety measures	-	to be included in contractor's cost	

Activity	Estimated Costs	Source of Funds	Remarks
Environmental mitigation measures	-	to be included in contractor's cost	To be evaluated based on each school's SEMP
ACM management	-	to be included in contractor's cost	To be determined based on detailed engineering design
Site inspections including transport and accommodation costs	-	Package CS-Ind-4 Package CS-F-1	Part of supervision cost Minimum number of site inspections: during detailed engineering design, during verification of contractor's review of SEMP and pre-works photo documentation, during civil works preferably monthly but may be more frequent if there are concerns on ACM/hazardous wastes and/or sensitive receptors, upon completion of work, notification of restoration/reinstatement of disturbed areas, and post-construction audit activities
GRM, awareness programs, trainings/workshops	\$5,000 per year of implementation	Package CS-Ind-4 Package CS-F-1	Cost covers both civil works packages (CW-I-1 and CW-I-2)

98. The cost of construction works is 2,889,600 USD. Based on preliminary information and estimates, the cost of the mitigation measures or EMP implementation amounts to 3% of the total cost of construction works. This will be further calculated based on detailed engineering designs.

99. **ADB review and clearance of the IEEs.** All IEEs and EMPs will be prepared prior to the announcement for tenders for construction contracts. The tender documents will include a requirement to add necessary resources for implementation. The Updated IEE for CW-I-1 and new IEE for CW-I-2 will be reviewed by the PIU to ensure completeness, applicability, and quality prior to submission for ADB's clearance. The PIU shall inform and confirm that key provisions and costs are incorporated in the bidding documents. ADB may request submission of relevant sections of the bidding documents as part of the review and clearance process. The ADB-cleared IEE with its EMP will be considered as part of the work contract.

100. The IEE may be updated in the event of (i) changes in construction activities in the detailed engineering design, (ii) unforeseen environmental impacts, (ii) in the event of a change in location of the subproject.

101. ADB and PIU disclose the Draft and Final IEEs on respective websites. The PIU will ensure that the IEEs are in form and language understandable by stakeholders and affected people.

V. PUBLIC CONSULTATION, DISCLOSURE AND COMPLAINTS REVIEW

A. Consultations and Stakeholders Engagement

102. Consultations and stakeholders engagement will be conducted to provide up to date information about planned and/or implemented activities, identify preferences, and determine all aspects of the possible impact of these activities on the environment in order to obtain the most objective information and take their opinions/feedback into account in the decision-making process.

103. **ADB requirements.** ADB SPS has specific disclosure and public consultation requirements. Disclosure includes providing information about the project to the general public and to the public affected by the project and other stakeholders, beginning early in the project cycle and throughout its implementation. Disclosure is intended to facilitate constructive engagement with affected communities and stakeholders throughout the life of the project.

104. For the project, consultations and stakeholders engagement will be undertaken during the updating of the Draft IEE of CW-I-1, preparation of the IEE of CW-I-2, and throughout throughout project implementation to address any environmental, health and safety issues of interest to local communities, non-government organizations, government, and other stakeholders. Before the start of the project, it is necessary to inform all stakeholders and people who will be affected by the project about the project and its impact.

105. The consultation report will be part of the IEEs and will include the key aspects listed below among others:

- (i) Relevant laws and regulations;
- (ii) The methodology used to inform and involve the public in the environmental assessment process;
- (iii) Analysis of collected data and information;
- (iv) Discussion of the strategic issues related to various stakeholders, level of participation,
- (v) Documentation of public meetings and interviews, including dates, names, topics discussed and results;
- (vi) Recommendations on how the project can address the issues raised during consultations; and,
- (vii) Recommended arrangements for ongoing public consultation across the entire environmental management program.

106. The results will be made public to the meetings at the locations and schools in form and language accessible to the participants of the meeting. A presentation will be prepared for the participants of the hearings, which will include the main topics for discussion:

- (i) Environmental and social impacts that will occur during project implementation;
- (ii) When will these impacts occur;
- (iii) Mitigation measures for anticipated impacts;
- (iv) Where stakeholders can apply during the project implementation period and receive answers to questions and complaints.

□

C. Grievance Redress Mechanism

107. The grievance redress mechanism (GRM) is a process and forum through which the affected people need a trusted way to voice and resolve concerns about EMP/IEE implementation and the project also finds an effective way to address affected people's concerns.

108. APs and local people have the right to file complaints and/or queries on any aspect of the project, including environmental, social and other safeguard issues. Under the GRM, people may appeal any decision, practice or activity related to the project. All possible avenues will be made available to the affected persons and others to voice their grievances. The MES/PIU will ensure that grievances and complaints on any aspect of the project are addressed in a timely and effective manner.

1. Objectives

109. Objectives of the GRM are:

- To reach mutually agreed solutions satisfactory to both the project and the APs, and to resolve any grievances locally, in consultation with the aggrieved party;
- To facilitate the smooth implementation of the project activities, particularly to cut down on lengthy litigation processes and prevent delays in project implementation; and
- To facilitate the development process at the local level, while maintaining transparency as well as to establish accountability to the affected people

110. The mechanism will consist of grievance resolution of two levels, the local and central levels. At each level, a grievance redress group (GRG) will be established. The role and responsibility of the GRGs is to accept claim and complaints, assess its validity, determine the scope of eventual impacts, and timely resolve the issue, including the claims regarding the compensation and maintain GRM as flexible and efficient to address and resolve the claims as raised during project implementation.

111. The GRM covers issues related to environmental, social and other safeguard issues under the ADB safeguard covenants and Kyrgyz Republic laws.

2. The Grievance Redress Groups

112. The Grievance Redress Groups (GRGs) will be established at both local and central levels. The GRGs will function for the duration of project implementation. The local GRGs include one in each related Ayil Aimak (village) and the central GRG will be set at MES in Bishkek city.

113. The contact information of GRGs will be included in the information brochures that will be distributed among the project related communities.

At each level of appeal, the GRG will be assisted as needed by the professional capacity to solve specific case. They include:

- (i) Representatives of the selected schools;
- (ii) Representatives of local authorities and State Rayon Administrations;
- (iii) Representatives of the Rayon Branch Cadastre;
- (iv) Technical expertise from professional engineers, and consultants with relevant experience in environment and social safeguards and resettlement.

3. Grievance Resolution Process

114. The complaints and grievances from the AHs will be addressed through the procedure described in Table 12 and Figure 1 further illustrates it.

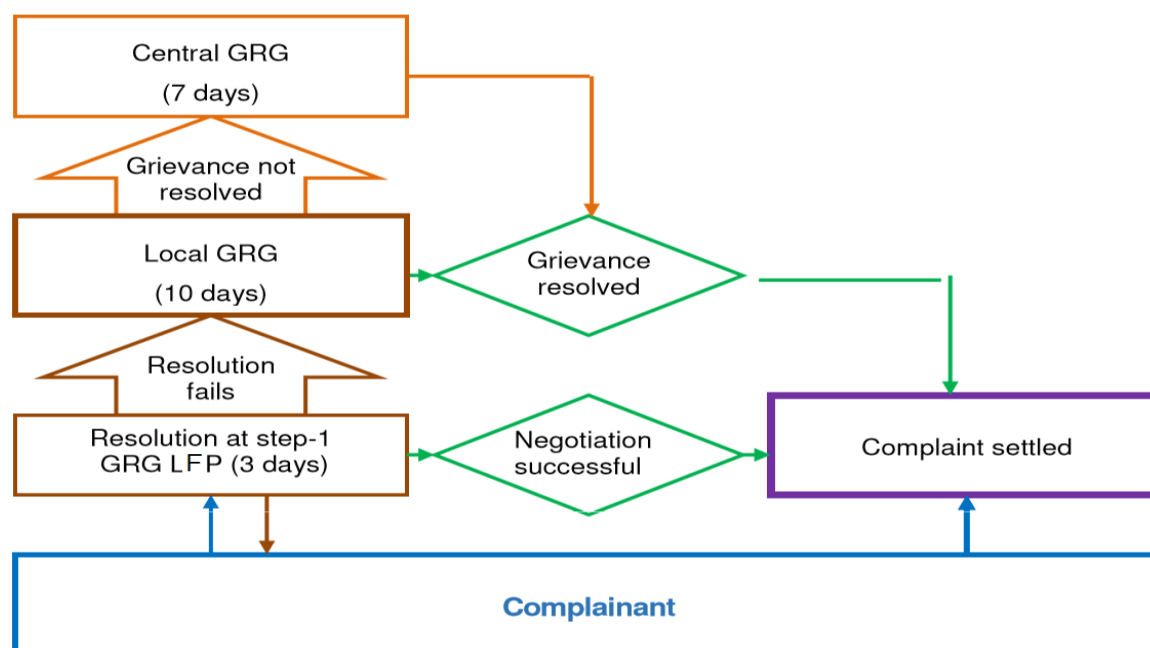
Table 12: Grievance Redress Procedure

Step	Action Level	Process	Timeline
1	Resolution by Local Focal Person	At initial stage, the LFP will give hearing to the aggrieved person and try to give acceptable solutions. If an aggrieved person is not satisfied with the solutions, then she/he will lodge grievances in written to the local GRG within 3 days.	3 days
2	Resolution at local level	After receiving written complaint, the LFP will review and prepare a Case File for GRG hearing and resolution. A formal hearing will be held with the GRG on a date fixed by the LFP in consultation with the aggrieved person. On the date of hearing, the aggrieved person will appear before the GRG and present proofs in support of his/her claim. The LFP will note down the statements of the complainant and document all proofs. The decision from majority of the members will be considered final from the GRG and will be issued by the LFP and signed by other members of the GRG. The case record will be updated and the decision will be communicated to the aggrieved person by the LFP within 10 days. If aggrieved person is not satisfied with the solution, the LFP will lodge grievance in written to the central GRG at MES/PIU with conclusion and supporting documents prepared at local level.	10 days
3	Resolution at central level	After receiving written complaint, the central GRG Chairperson will review and prepare a Case File for GRG hearing and resolution. A formal hearing will be held on a date fixed by the GRG Chairperson and the aggrieved person. GRG members will contact the complainant and visit his/her village. The responsible (safeguard) specialist of MES/PIU will note down the statements of the complainant and document all proofs. The decisions from majority of the members will be considered final from the central GRG and will be issued by the Chairperson and signed by other members. The case record will be updated and the decision will be communicated to the aggrieved person by the specialist of MES/PIU within 7 days of submission.	7 days

115. The PIU of the MES will document all grievances in both written and electronic forms. The PIU will ensure that all grievances and their resolution status will be documented in the Grievance Logbook. The representatives of local authorities may use their own procedures for documenting the grievances.

116. The PIU will ensure that all grievances and their status will be monitored and reflected in the project's progress reports. The Contractor should incorporate the grievances and their resolution status in monthly progress reports submitted to the PIU, who in its turn will reflect this in the semiannual social safeguard monitoring reports that will be submitted to ADB.

Figure 1: Grievance Redress Procedure



4. Additional Mechanisms

117. Any physical and legal person, any appellant can communicate his/her concern to the court at any stage of grievance redress. The GRGs will not restrict or influence the AP from applying to court for legal remedies.

118. If the complaint is found invalid, the GRG will formulate a response and send a written letter to the complainant, explaining the reasons of rejection.

119. In addition, ADB has its Accountability Mechanism Policy (2012)⁵ that is to be accountable to people for ADB-assisted projects as a last resort mechanism. The accountability mechanism provides a forum where people adversely affected by ADB-assisted projects can voice and seek solutions to their problems and report alleged noncompliance of ADB's operational policies and procedures.

120. The complainant, if not satisfied with GRG's decision or even the court's decision, can appeal the case to Office of the Special Office Facilitator of ADB⁶. The GRGs will not in any way impede APs' access to the ADB Accountability Mechanism.

121. All expenses incurred by affected households in grievance/complaint filing and its resolution will be covered by the project.

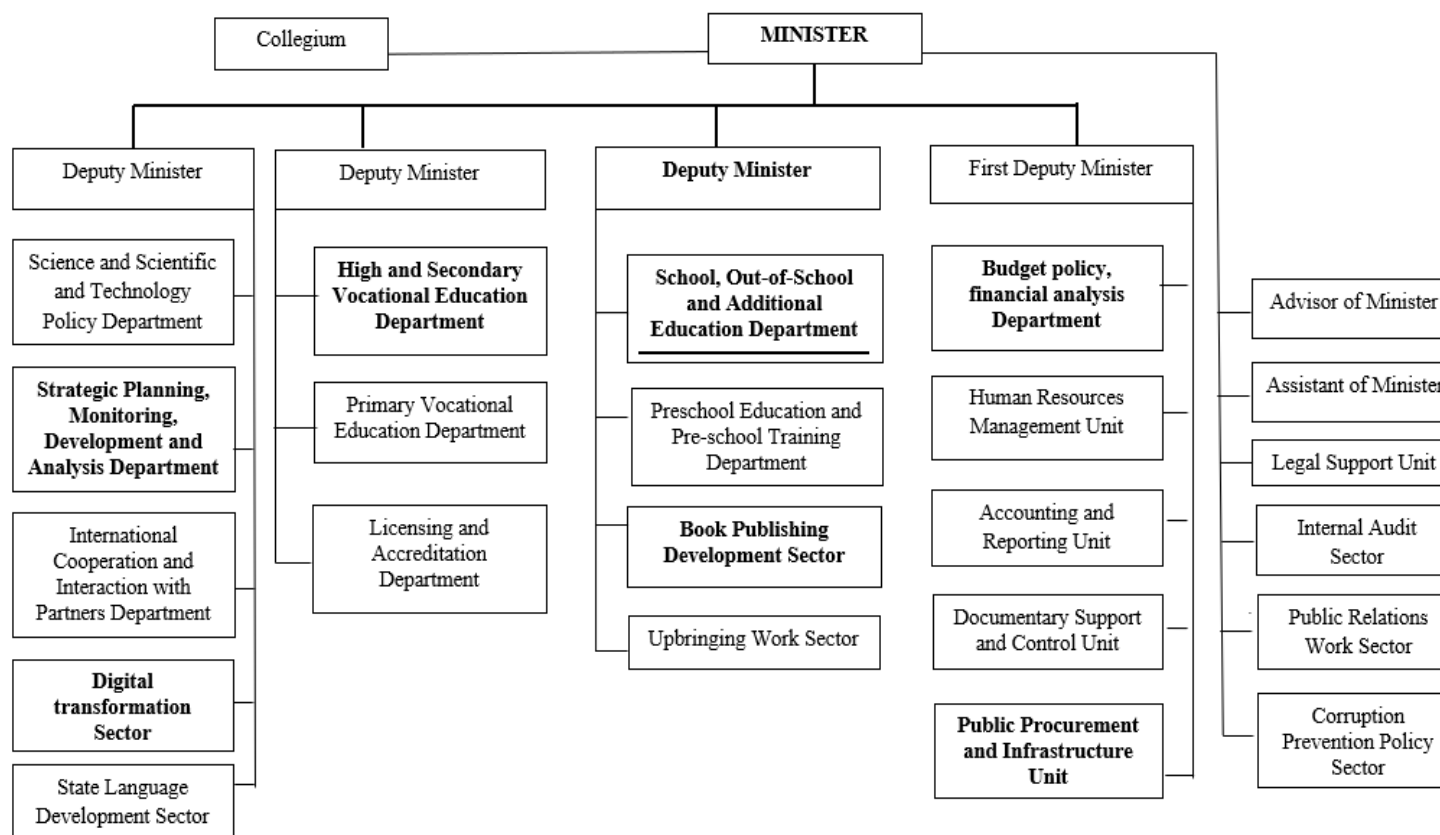
⁵ <https://www.adb.org/site/accountability-mechanism/main>

⁶ www.adb.org/site/accountability-mechanism/contacts

VI. INSTITUTIONAL STRUCTURES AND RESPONSIBILITIES

122. Figure 2 shows the structure of the MES.

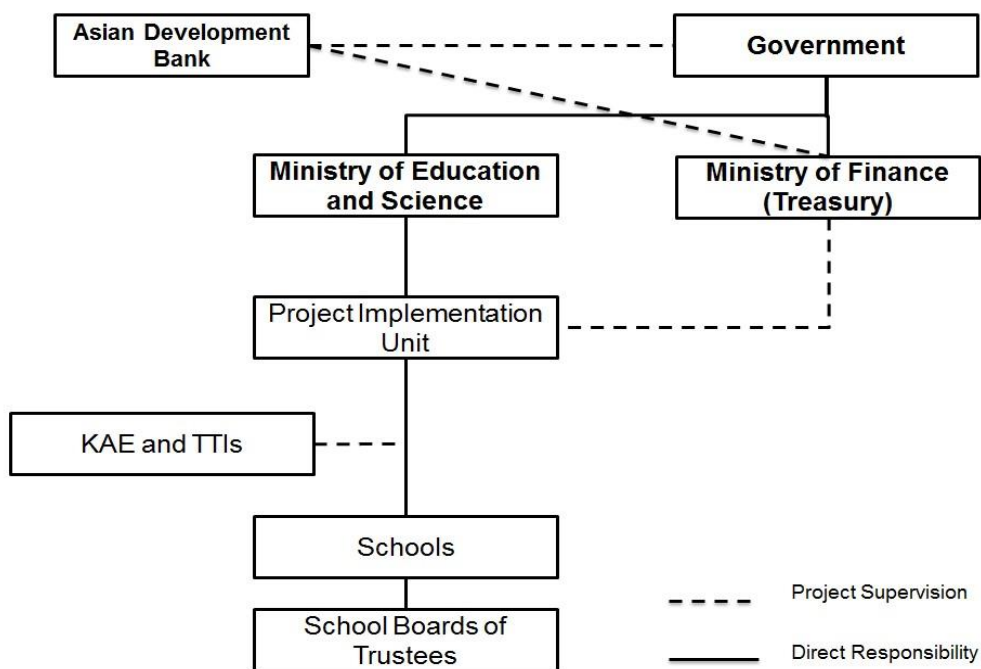
Figure 3: Structure of the Central Office of the Ministry of Education and Science of the Kyrgyz Republic



Source: Ministry of Education and Science

123. The Project will be implemented over five years, from 2023 to 2027. Project implementation involves a number of MES agencies and units, the MOF, a Project Steering Committee, and various other agencies. The MES will be the executing agency for the project grant and investment loan and implementing agency for the policy-based grant. The present PIU under MES will serve as the PIU for the project. The PIU will oversee and manage project implementation, including procurement, recruitment of consulting services and disbursement activities. Some new PIU staff will be recruited, including a Teacher Development Specialist and Online Learning Support Specialist, and others as needed.

Figure 3: Program Organization Structure



Source: Project Administration Manual

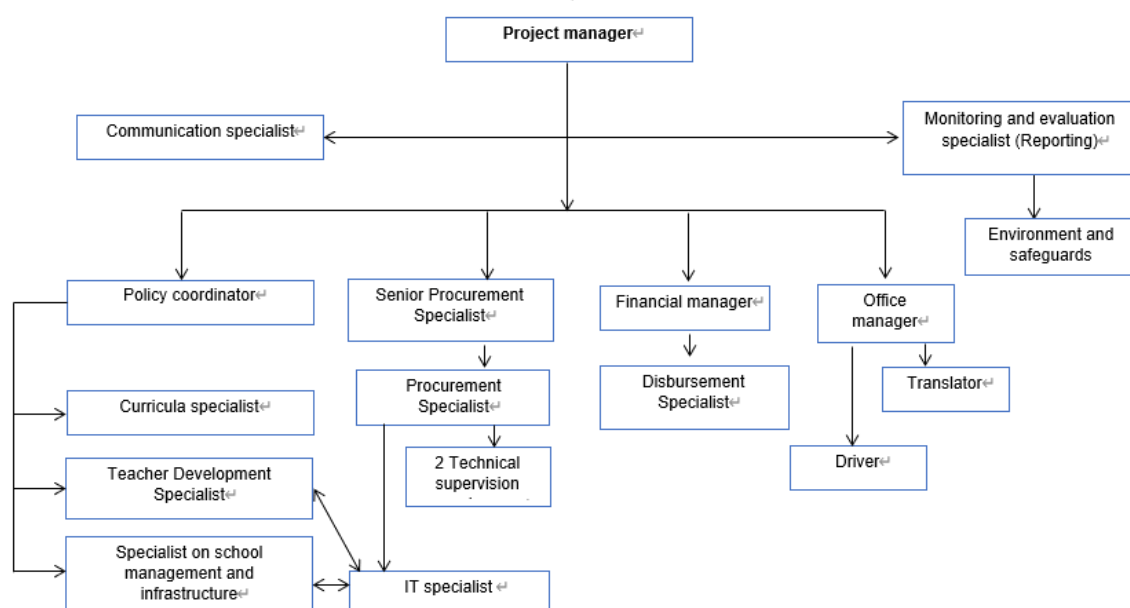
124. MES will be the executing and the implementing agency for both the policy-based grant and the investment project. The project implementation unit (PIU) will oversee daily operation and manage implementation, including the procurement, recruitment of consulting services, and disbursement activities as well as timely implementation of policy actions. To facilitate timely start-up activities, mission and government agreed to do advance contracting of 6 PIU staff (manager, senior procurement, finance, disbursement, monitoring and evaluation, and office manager) immediately after loan negotiations. Other staff with specific specialization and expertise will also be recruited as part of the PIU team after project effectiveness. The project steering committee (PSC) of Strengthening Education System Sector Development Project will assume responsibilities to oversee the program and MES Deputy Minister responsible for the school education will be the project coordinator to oversee, coordinate, and facilitate program implementation. The PSC will meet twice a year and be responsible for (i) approving the annual project budget and activity plan, (ii) reviewing and advising on implementation progress, and (iii) ensuring policy and other significant issues affecting implementation are dealt with promptly. The PIU will work with relevant institutions, including the Kyrgyz Academy for Education (KAE), the Republic Teacher Training Institute, universities, innovative schools, and other stakeholders.

125. Assuming the role of Executing Agency for both the policy and investment parts of the project the MES will:

- (i) Appoint the project director (Deputy Minister of the MES) who also will provide overall guidance to the PIU;
- (ii) Mobilize the PIU staff to support project implementation;
- (iii) Direct the program implementation;
- (iv) Provide guidance to the PIU as required;
- (v) Arrange required cross-agency and inter-ministerial policy dialogue; and
- (vi) Ensure that all policy conditions are satisfied in a timely manner.

126. The PIU will work with relevant institutions, including the KAE, KSU (I.Arabaev) and other Teacher Training Institutes, Republic Teacher Training Institute Oblast In-service Teacher Training Institutes and Methodological Centers (OTTI/MC), Local Self Governance Bodies (Ayil Okmoty - AO), Teachers' Associations and schools.

Figure 3 Organization Structure of the PIU under the Ministry of Education and Science of the Kyrgyz Republic



127. Project Implementation Unit (PIU):

- (i) Serve as the project implementation body;
- (ii) Be responsible for the day-to-day project implementation;
- (iii) Manage specific program implementation activities, including procurement, recruitment, supervision and coordination of consulting services, report preparation, the project performance monitoring system, simplified environmental screening and management checklist, and the preparation and submission of disbursement claims;
- (iv) Be responsible for preparation of supporting documents for replenishment of the imprest account, financial statements, and arrangement of the annual audit report in close consultation with MOF officials; and
- (v) Monitor compliance with policy, legal, financial, economic, environmental, social, and other covenants contained in the project legal agreements; and Monitor and report program progress and performance to both MES and ADB.

128. The PIU will hire an Environmental Safeguards Specialist. A national environmental safeguards specialist will be recruited to support the program implementation with goal of

ensuring that the civil works necessary to upgrade the selected innovative schools are carried out in accordance with the customized environmental management plans prepared for each of the schools. The expert will have an advanced degree in environmental science or a related subject and at least 10 years of work experience in the field that includes conducting formal environmental risk assessments, and the preparation and monitoring of related environmental management plans. Previous experience of the education sector and school refurbishment would be helpful. The specialist, who must be proficient in reading and writing in the English language, will perform the following functions, duties, and tasks to support MES, KAE, and innovative schools in the following:

129. Update the IEE and school EMPs according to the specific engineering design and environmental impacts of innovative school rehabilitation works;

- (i) Assess the capacity of the PIU and the engineering design and supervision firm and provide corresponding training, ensure the compliance of environmental security policies during the implementation of the Project;
- (ii) Assist the PIU, the design firm and the innovative schools to carry out meaningful consultations and disclosures regarding the proposed school rehabilitation works;
- (iii) Assist the PMO and the implementing units in establishing the environmental grievance mechanism and provide guidance for operation of the grievance mechanism;
- (iv) Supervise the implementation of the school EMPs and propose corrective actions if necessary;
- (v) Assist the PIU to compile content related to environmental safeguard in the project progress report
- (vi) Other environmental tasks as assigned by the PIU.

130. ADB:

- (i) Provide guidance to the executing and implementing agencies to ensure smooth project implementation and achieve the desired development impacts and their sustainability;
- (ii) Conduct regular loan review missions, a midterm review mission, and project completion review mission;
- (iii) Review and approve procurement actions;
- (iv) Process the withdrawal applications;
- (v) Monitor the status of compliance with all loan and grant covenants;
- (vi) Review the annual audit report and follow up on the implementation of audit recommendations;
- (vii) Regularly update the project performance review reports with the assistance of the executing and implementing agencies;
- (viii) Regularly update the project information documents for public disclosure on the ADB website, including safeguard documents and the procurement plan; and,
- (ix) Monitor implementation of ADB's anticorruption policies.

131. Engineering company:

- (i) Conducts a survey of sub-projects (schools) and prepares a description of the physical work to modernize the infrastructure of the school;
- (ii) Develops a Detailed Design for the modernization of schools; and,
- (iii) Fills out the Statement on Environmental Consequences and submits it together with the Detailed Design for state environmental expertise

132. Construction contractor:

- (i) Develops Site-Specific Environmental Management Plan;

- (ii) Implements the measures provided for in the EMP on environmental and social safety;
- (iii) The contractor is responsible for the implementation of measures to reduce the negative impact on the environment.
- (iv) Prepares a monthly report on the implementation of the EMP in the PIU MES;
- (v) Carries out other activities and works to ensure environmental and social safety, safety of workers.

VII. OVERALL PROJECT IMPLEMENTATION PLAN

133. In Table 13 the outputs are listed with key implementation activities by a quarter and year. This table should be updated annually and submitted to ADB with contract and disbursement projections for the following year.

Table 13: Detailed Overall Implementation Plan and Schedule

Activities	2023 (Quarter)				2024 (Quarter)				2025 (Quarter)				2026 (Quarter)				2027 (Quarter)				2028 (Quarter)			
	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
Output 1: Quality and Relevance of Curriculum with Priority on Interdisciplinary Approaches Improved																								
1.1 Design a step-by-step instruction/guideline for curricula development⁷	■																							
1.2 Training of curricula developers			■	■																				
1.3 Provide mentorship for curricula developers during curricula development process					■	■	■	■	■	■	■													
1.4 Enhance the capacity of Kyrgyz Academy of Education staff								■	■	■	■	■	■	■	■									
1.5 Build capacity of Textbook Assessment Center staff					■	■	■	■	■	■	■	■	■	■	■									
Output 2: Quality of Teaching Improved																								
2.1 Under the review of the PRESETT system and implement PRESETT reforms⁸										■	■	■	■	■	■									
2.2 Undertake the review of the INSETT system and implement INSETT reforms										■	■	■	■	■	■									
2.3 Prepare training materials, train trainers, and train 10,000 teachers in STEM and functional literacy										■	■	■	■	■	■	■	■	■	■					
Output 3: Network of Innovative Schools Strengthened																								

⁷ In accordance with the Regulation on the development and review of the State Standard for school education and subject curricula for general education schools in the Kyrgyz Republic.

⁸ Includes teachers' subject knowledge, teachers' pedagogical skills, link between the pre-service teacher training system and schools, teachers' professional standards, certification of graduates of the pre-service teacher training system, quality of pre-service teacher training, and fast-track teaching licence.

Activities	2023 (Quarter)				2024 (Quarter)				2025 (Quarter)				2026 (Quarter)				2027 (Quarter)				2028 (Quarter)			
	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
3.1 Upgrade the infrastructure of 23 schools to innovative school standards																								
3.2 Upgrade the equipment of 53 (23+20) schools to STEM model schools (including ICT)																								
3.3 Provide 220 cluster schools with laboratory equipment																								
3.4 Upgrade the physical infrastructure and equipment of Kyrgyz Academy of Education																								
3.5 Pilot new curricula in 53 schools																								
3.6 Train school management staff on the implementation of the new curricula with focus on effective school leadership																								
3.7 Provide support to cluster schools in effective networking with schools																								
Project Management Activities																								
4.1 Recruitment of remaining PIU staff																								
4.2 Ongoing day-to-day PIU operations																								
4.3 Prepare and submit semi-annual progress reports to ADB																								
4.4 Prepare and submit mid-term review report to ADB																								
4.5 Prepare and submit project completion report to ADB																								
4.6 ADB inception mission and semi-annual review missions																								
4.7 ADB Mid-term Review and PCR Missions																								

Activities	2023 (Quarter)				2024 (Quarter)				2025 (Quarter)				2026 (Quarter)				2027 (Quarter)				2028 (Quarter)			
	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
4.8 Recruitment of Consultants^a	■	■	■																					
4.9 Procurement of Works, Goods and Services			■	■	■	■	■	■	■	■	■	■	■											
4.10 Implementation of environment management plans					■	■																		
4.11 Implementation of Gender Action Plan		■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■				
4.12 Implementation of communication strategy			■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■				
4.13 Organization of training and capacity-building activities	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■				

ADB= Asian Development Bank, ICT = information, communication and technology; INSETT = in-service teacher training; PIU = project implementation unit, PRESETT = pre-service teacher training,

^a Curricula reform advisor, curricula and textbook review expert, gender and inclusion specialist, international teacher training expert, national teacher training expert, international school management specialist, national school management specialist, survey specialist.

Source: Asian Development Bank.

VIII. MONITORING AND REPORTING

134. The civil engineering firm engaged to supervise school rehabilitation works and staff of the project schools where rehabilitation works take place will conduct regular site inspections in accordance with the inspection plan defined in each school's SEMP. The PIU will be notified of any issues or concerns identified by the inspections and will be responsible for investigation and follow-up. Issues that arise and how these have been dealt with will be summarized in the quarterly progress reports and the consolidated annual reports prepared by the PIU for ADB.

135. Semi-annual environmental monitoring report will be submitted to ADB following the template in Appendix 3 or as provided by ADB commencing six months upon effectivity date until the project completion report is issued. The schedule for submission is every 31 July for reporting period January to June, and every 31 January for reporting period covering period July to December. ADB will review and may request additional information from PIU prior to disclosure on ADB website. Upon clearance to disclose, PIU will disclose the SAEMR on its website and may be required to translate to local language to ensure understanding of the stakeholders, workers and affected people.

136. The reports will include summaries of environmental progress, achievements and shortcomings related to the implementation of the EMP, monitoring data collected, information on non-compliance sent to contractors, complaints received from stakeholders through GRM or otherwise, and actions taken to address problems.

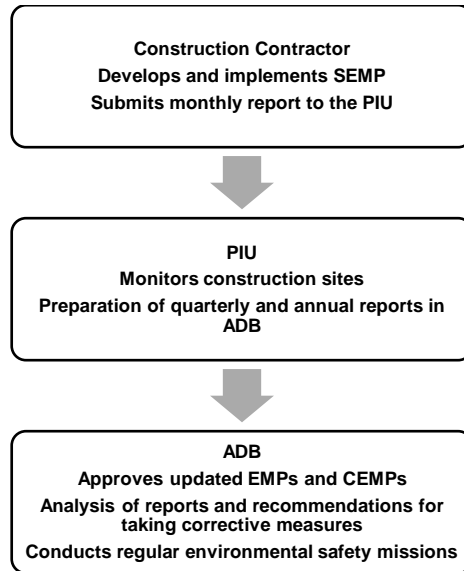
137. Contractors will keep records of releases, spills, accidents, complaints, and provide copies to the PIU as part of their monthly progress reports.

138. Public consultations during the updating and preparation of the IEEs will be recorded in the minutes of the consultations and to be included in the IEE as an attachment.

139. During construction, stakeholder complaints and actions taken to resolve them will be recorded in complaint logs maintained by the local GRM coordinators. Monthly environmental monitoring reports will review all active logs and summarize GRM activities for the reporting period.

140. ADB review missions will examine and report on compliance with environmental conditions in the loan agreement documents and the Project Administration Manual. PIU will be required to prepare time-bound action plans in case of non-compliances.

Figure 4. Scheme for Monitoring and Reporting on the Implementation of the EMP



1. Training and Capacity Building

141. The capacity of the PIU and contractor staff responsible for EMP implementation, supervision, monitoring, and reporting will be strengthened by appointing experienced and trained staff. The contractor will appoint a person responsible for the implementation of the EMP.

142. The PIU will conduct trainings for responsible employees of the contractor on environmental safety throughout the entire period of reconstruction of schools.

RAPID ENVIRONMENTAL ASSESSMENT (REA) CHECKLIST

Instructions:

- (i) The project team completes this checklist to support the environmental classification of a project. It is to be attached to the environmental categorization form and submitted to the Safeguards Division (SDSS), for endorsement by Director, SDSS and for approval by the Chief Compliance Officer.
- (ii) This checklist focuses on environmental issues and concerns. To ensure that social dimensions are adequately considered, refer also to ADB's: (a) checklists on involuntary resettlement and Indigenous Peoples; (b) poverty reduction handbook; (c) staff guide to consultation and participation; and (d) gender checklists.
- (iii) Answer the questions assuming the "without mitigation" case. The purpose is to identify potential impacts. Use the "remarks" section to discuss any anticipated mitigation measures.

Country/Project Title

Kyrgyz Republic/ School Education Reform Sector Development Program.
Project site: Shopokov School No. 3, Sokuluk village, Chui oblast

Sector Division:

CWSS

Screening Questions	Yes	No	Remarks
A. Project Siting Is the Project area adjacent to or within any of the following environmentally sensitive areas?		x	None of below
<input checked="" type="checkbox"/> Cultural heritage site		x	Not applicable to the project. Based on preliminary information, the 23 schools, the Kyrgyz Academy of Education (KAE), and cluster schools are not located in nor adjacent to cultural heritage areas. The surrounding areas (50 meters) around each site will be further assessed during implementation to confirm the information. The screening procedure will be incorporated in the environmental assessment and review framework (EARF).
<input checked="" type="checkbox"/> Legally protected Area (core zone or buffer zone)		x	Not applicable to the project. Based on preliminary information, the 23 schools, the KAE, and cluster schools are not located in nor adjacent to legally protected areas. The surrounding areas (50 meters) around

Screening Questions	Yes	No	Remarks
			each site will be further assessed during implementation to confirm the information. The screening procedure will be incorporated in the EARF.
<input checked="" type="checkbox"/> Wetland		x	Not applicable to the project. There are no wetlands in Kyrgyzstan.
<input checked="" type="checkbox"/> Mangrove		x	Not applicable to the project. There are no mangrove areas in Kyrgyzstan.
<input checked="" type="checkbox"/> Estuarine		x	Not applicable to the project. There are no estuarine areas in Kyrgyzstan.
<input checked="" type="checkbox"/> Special area for protecting biodiversity		x	Not applicable to the project. Based on preliminary information, the 23 schools, the KAE, and cluster schools are not located in nor adjacent to special areas for protecting biodiversity. The surrounding areas (50 meters) around each site will be further assessed during implementation to confirm the information. The screening procedure will be incorporated in the EARF.
B. Potential Environmental Impacts Will the Project cause...			
<input checked="" type="checkbox"/> impairment of historical/cultural areas; disfiguration of landscape or potential loss/damage to physical cultural resources?		x	Not applicable to the project. Based on preliminary information, the 23 schools, the KAE, and cluster schools are not located in nor adjacent to cultural heritage areas.
<input checked="" type="checkbox"/> disturbance to precious ecology (e.g. sensitive or protected areas)?		x	Not applicable to the project. Based on preliminary information, the 23 schools, the KAE, and cluster schools are not located in nor adjacent to environmentally-sensitive areas.
<input checked="" type="checkbox"/> alteration of surface water hydrology of waterways resulting in increased sediment in streams affected by increased soil erosion at construction site?		x	Not anticipated. The sites are not located nor adjacent to streams. Construction activities will not cause increased sediments.
<input checked="" type="checkbox"/> deterioration of surface water quality due to silt runoff and sanitary wastes from worker-based camps and chemicals used in construction?		x	Not anticipated. There will be no workers' camp required. The chemicals that will be used during construction will be limited to paint, paint thinners/strippers/cleaners, and will be in small quantities only.
<input checked="" type="checkbox"/> increased air pollution due to project construction and operation?	x		Repair work will be carried out not only inside the school building, but also outside: (i) repair of drinking water and sewerage pipelines, and (ii) possibly repair or re-build outdoor toilets that are located outside and have septic tanks. Emissions to the atmosphere will be from works: (i) work of motor vehicles, construction

Screening Questions	Yes	No	Remarks
			equipment; (ii) welding, insulation, finishing works; (iii) stone and concrete works; and (iv) excavation/dismantling. The potential impacts are temporary, site-specific, and short in duration. The impacts will be managed thru avoidance, minimization, and mitigation measures to be included in the environmental management plan (EMP) and its subplans.
<input checked="" type="checkbox"/> noise and vibration due to project construction or operation?	x		Within the local area of the school. Only during construction. The potential impacts are temporary, site-specific, and short in duration. The impacts will be managed thru avoidance, minimization, and mitigation measures to be included in the EMP and its subplans.
<input checked="" type="checkbox"/> involuntary resettlement of people? (physical displacement and/or economic displacement)		x	Not applicable to the project. All sites are government-owned lands and there are no people that will be physically or economically displaced due to the project.
<input checked="" type="checkbox"/> disproportionate impacts on the poor, women and children, Indigenous Peoples or other vulnerable groups?		x	Not applicable to the project. The project will not have impact on vulnerable people.
<input checked="" type="checkbox"/> poor sanitation and solid waste disposal in construction camps and work sites, and possible transmission of communicable diseases (such as STIs and HIV/AIDS) from workers to local populations?	x		Anticipated during construction. Solid household waste will be generated at construction sites, which must be disposed of at specially designated landfills in the Kyrgyz Republic. There is a potential risk of workers living in poor sanitary conditions, and drinking poor quality drinking water. The potential impacts are temporary, site-specific, and can be mitigated by measures to be included in the EMP and its subplans.
<input checked="" type="checkbox"/> creation of temporary breeding habitats for diseases such as those transmitted by mosquitoes and rodents?		x	Not anticipated. The construction activities will be short in duration and will not construct any facilities that may be breeding habitats for mosquitoes and rodents. The contractor will be required to practice good housekeeping and clean the work areas every end of shift.
<input checked="" type="checkbox"/> social conflicts if workers from other regions or countries are hired?		x	Not anticipated. Local workers will be engaged to the extent possible.
<input checked="" type="checkbox"/> large population influx during project construction and operation that causes increased burden on		x	Not anticipated. Construction activities are small-scale and will not require large number of non-local

Screening Questions	Yes	No	Remarks
social infrastructure and services (such as water supply and sanitation systems)?			workers. Local workers will be prioritized to the extent possible.
<input checked="" type="checkbox"/> risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during project construction and operation?	x		<p>Anticipated during construction. Potential exposure of workers during construction activities to: (i) air emissions of dust, welding fumes, solvents used in the application of paints, resins, and similar substances, cement; (ii) danger of cuts, fractures, and other types of injuries when using construction equipment, (iii) danger when handling hazardous waste; (iv) consumption of contaminated water, violation of the rules of sanitation and hygiene can lead to gastrointestinal poisoning, (v) risk of electric shock.</p> <p>The potential impacts are temporary, site-specific and can be mitigated by measures to be included in the EMP and its subplans.</p>
<input checked="" type="checkbox"/> risks to community health and safety due to the transport, storage, and use and/or disposal of materials such as explosives, fuel and other chemicals during construction and operation?	x		<p>Potential asbestos-containing materials in old schools to be rehabilitated. Risks may be associated with old asbestos cement materials if they are discovered during construction. Hazardous waste, and asbestos-containing materials will be disposed of in accordance with the safety measures provided in the Asbestos Management Plan (AMP), to be required for each contractor. The ADB's Good Practice Guidance for the Management and Control of Asbestos: Protecting Workplaces and Communities from Asbestos Exposure Risks (https://www.adb.org/publications/good-practice-management-control-asbestos) will be included in the bid documents for guidance of the contractors in preparing the AMP.</p>
<input checked="" type="checkbox"/> community safety risks due to both accidental and natural causes, especially where the structural elements or components of the project are accessible to members of the affected community or where their failure could result in injury to the community throughout project construction, operation and decommissioning?	x		<p>Anticipated during construction activities as the schools are currently being used. However, during construction, the working areas will be barricaded and off-limits to the public. The EMP and its subplans will include occupational and community health and safety measures to be implemented by the contractor.</p>
<input checked="" type="checkbox"/> generation of solid waste and/or hazardous waste?	x		<p>Anticipated during construction. Construction will generate municipal solid waste and construction non-</p>

Screening Questions	Yes	No	Remarks
			<p>hazardous waste. Prior to start of works, the contractor will be required to identify disposal sites for construction wastes.</p> <p>Hazardous waste may also be generated: mercury-containing (old fluorescent lamps) and asbestos-containing waste (old asbestos-cement water and sewer pipes, roofing). The Asbestos Management Plan will be prepared by the PIU with the support of Construction Supervision Consultants in accordance with the ADB Good Practice Guidance for Asbestos Management and Control: Protecting Workplaces and Communities from Asbestos Risks https://www.adb.org/publications/good-practice-management-control-asbestos</p>
☑ use of chemicals?	x		<p>Anticipated during construction. The chemicals that will be used during construction will be limited to paint, paint thinners/strippers/cleaners and will be of small quantities only.</p>
☑ generation of wastewater during construction or operation?	x		<p>Anticipated during construction. During the construction period, domestic wastewater will be generated by workers on the construction site. Many of the selected schools are located in villages and cities where there is no sewerage and wastewater is collected in septic tanks and cesspools. The removal and disposal of wastewater from septic tanks may contain a risk of environmental pollution. This problem exists even after school renovations.</p> <p>The potential impacts are temporary, site-specific, and can be mitigated by measures to be included in the EMP and its subplans. The EMP developed measures to mitigate the environmental impact of wastewater disposal.</p>

A Checklist for Preliminary Climate Risk Screening

Country/Project Title: KGZ: School Education Reform Sector Development Program
Sector: Education
Subsector: Education Sector Development; Secondary
Division/Department: CWRD/CWSS

Screening Questions		Score	Remarks ¹
Location and Design of project	Is siting and/or routing of the project (or its components) likely to be affected by climate conditions including extreme weather-related events such as floods, droughts, storms, landslides?	1	Climate and geological hazard risk ratings are medium and high, respectively, for the location of school buildings. Appropriate adaptation measures should be undertaken following a thorough climate risk assessment.
	Would the project design (e.g. the clearance for bridges) need to consider any hydro-meteorological parameters (e.g., sea-level, peak river flow, reliable water level, peak wind speed etc.)?	1	
Materials and Maintenance	Would weather, current, and likely future climate conditions (e.g. prevailing humidity level, temperature contrast between hot summer days and cold winter days, exposure to wind and humidity hydro-meteorological parameters likely affect the selection of project inputs over the life of project outputs (e.g. construction material)?	1	
	Would weather, current, and likely future climate conditions, and related extreme events likely affect the maintenance (scheduling and cost) of project output(s)?	1	
Performance of project outputs	Would weather/climate conditions, and related extreme events likely affect the performance (e.g. annual power production) of project output(s) (e.g. hydro-power generation facilities) throughout their design lifetime?	0	

Options for answers and corresponding score are provided below:

Response	Score
Not Likely	0
Likely	1
Very Likely	2

Responses when added that provide a score of 0 will be considered low risk project. If adding all responses will result to a score of 1–4 and that no score of 2 was given to any single response, the project will be assigned a medium risk category. A total score of 5 or more (which include providing a score of 1 in all responses) or a 2 in any single response, will be categorized as high risk project.

Result of Initial Screening (Low, Medium, High): Medium

¹ If possible, provide details on the sensitivity of project components to climate conditions, such as how climate parameters are considered in design standards for infrastructure components, how changes in key climate parameters and sea level might affect the siting/routing of project, the selection of construction material and/or scheduling, performances and/or the maintenance cost/scheduling of project outputs.

Other Comments: The project aims to accelerate and sustainably deepen and expand reforms in key education areas. It will also embark on construction of school buildings that will have to consider both climate adaptation and mitigation measures.

Prepared by: Malte Maass, Climate Change Specialist, CWRD
Date: 19 May 2022

SAMPLE CONTENTS OF IEE

Executive Summary

This section describes concisely the critical facts, significant findings, and recommended actions.

Policy, Legal, and Administrative Framework

This section discusses the national and local legal and institutional framework within which the environmental assessment is carried out. It also identifies project-relevant international environmental agreements to which the country is a party.

Description of the Project

This section describes the proposed project; its major components; and its geographic, ecological, social, and temporal context, including any associated facility required by and for the project (for example, access roads, power plants, water supply, quarries and borrow pits, and spoil disposal). It normally includes drawings and maps showing the project' s layout and components, the project site, and the project's area of influence.

Description of the Environment (Baseline Data)

This section describes relevant physical, biological, and socioeconomic conditions within the study area. It also looks at current and proposed development activities within the project's area of influence, including those not directly connected to the project. It indicates the accuracy, reliability, and sources of the data.

Anticipated Environmental Impacts and Mitigation Measures

This section predicts and assesses the project's likely positive and negative direct and indirect impacts to physical, biological, socioeconomic (including occupational health and safety, community health and safety, vulnerable groups and gender issues, and impacts on livelihoods through environmental media, and physical cultural resources in the project's area of influence, in quantitative terms to the extent possible; identifies mitigation measures and any residual negative impacts that cannot be mitigated; explores opportunities for enhancement; identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions and specifies topics that do not require further attention; and examines global, transboundary, and cumulative impacts as appropriate.

Analysis of Alternatives

This section examines alternatives to the proposed project site, technology, design, and operation—including the no project alternative—in terms of their potential environmental impacts; the feasibility of mitigating these impacts; their capital and recurrent costs; their suitability under local conditions; and their institutional, training, and monitoring requirements. It also states the basis for selecting the particular project design proposed and, justifies recommended emission levels and approaches to pollution prevention and abatement.

Formation Disclosure, Consultation, and Participation

This section:

- (i) describes the process undertaken during project design and preparation for engaging stakeholders, including information disclosure and consultation with affected people and other stakeholders;
- (ii) summarizes comments and concerns received from affected people and other stakeholders and how these comments have been addressed in project design and mitigation measures, with special attention paid to the needs and concerns of vulnerable groups, including women, the poor, and Indigenous Peoples; and
- (iii) describes the planned information disclosure measures (including the type of information to be disseminated and the method of dissemination) and the process for carrying out consultation with affected people and facilitating their participation during project implementation.

Grievance Redress Mechanism

This section describes the grievance redress framework (both informal and formal channels), setting out the time frame and mechanisms for resolving complaints about environmental performance.

Environmental Management Plan

This section deals with the set of mitigation and management measures to be taken during project implementation to avoid, reduce, mitigate, or compensate for adverse environmental impacts (in that order of priority). It may include multiple management plans and actions. It includes the following key components (with the level of detail commensurate with the project' s impacts and risks):

- (i) Mitigation (see template in Table):
 - (a) identifies and summarizes anticipated significant adverse environmental impacts and risks;
 - (b) describes each mitigation measure with technical details, including the type of impact to which it relates and the conditions under which it is required (for instance, continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate;
 - (c) provides links to any other mitigation plans (for example, for involuntary resettlement, Indigenous Peoples, or emergency response) required for the project;
 - (d) provides performance indicators, institutional responsibilities and cost estimates;
 - (e) the plan may also include enhancement measures (i.e. measures that significantly improve the baseline environment at low additional cost); if these are physical works and are within the scope of Project financing, they will be incorporated in the subproject civil works designs.

Mitigation Plan Summary Template

Project Stage	Project Activity	Potential Environmental Impacts	Proposed Mitigation Measures	Institutional Responsibilities	Cost Estimates (US\$)
Construction Phase					
Operation and Maintenance					

Phase

- (ii) Monitoring (see template in Table):
- (a) describes monitoring measures with technical details, including parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits and definition of thresholds that will signal the need for corrective actions; and
 - (b) describes monitoring and reporting procedures to ensure early detection of conditions that necessitate particular mitigation measures and document the progress and results of mitigation.
 - (c) identifies institutional responsibilities for monitoring and estimates approximate costs.

Mitigation Plan Summary Template

Project	Project Activity	Potential Environmental Impacts	Proposed Mitigation Measures	Institutional Responsibilities	Cost Estimates (US\$)

- (iii) Implementation arrangements:
- (a) specifies the implementation schedule showing phasing and coordination with overall project implementation;
 - (b) describes institutional or organizational arrangements, namely, who is responsible for carrying out the mitigation and monitoring measures, which may include one or more of the following additional topics to strengthen environmental management capability: technical assistance programs, training programs, procurement of equipment and supplies related to environmental management and monitoring, and organizational changes; and
 - (c) estimates capital and recurrent costs and describes sources of funds for implementing the environmental management plan.
- (iv) Performance indicators:
- (a) describes the desired outcomes as measurable events to the extent possible, such as performance indicators, targets, or acceptance criteria that can be tracked over defined time periods.

Conclusion and Recommendation

This section provides the conclusions drawn from the assessment and provides recommendations.

MEASURES TO PREVENT THE SPREAD OF COVID-19¹⁰

1. These requirements have been prepared in accordance with the interim advisory note “Protecting the safety and wellbeing of workers and communities from COVID-19” provided by ADB.¹¹

2. Given the complexity of the situation and the fact that there are a large number of employees in one place, there is a possibility of the spread of infectious diseases and the consequences of such a spread.

3. In this regard, contractors’ organizations (hereinafter referred to as Contractors) who carry out work on the sites selected under this project should take all precautions to maintain the health and safety of the Contractor's personnel.

4. Assessment of the workforce characteristics

It is necessary to prepare a detailed profile of the workforce, namely:

- Break down workers into those who live home, in the nearby community, and those who live on the site.
- Identify workers who may be at greater risk from COVID-19, those with serious health problems, or who may be otherwise at risk.
- Consider ways to minimize the movement within the facility (construction site) and outside. This may include extending the existing contracts to prevent workers from returning home to the affected areas or returning workers to the site from the affected areas.
- Consider requiring workers who live in the local community to move to a construction camp where the same restrictions apply.

5. Regulation of working methods

Consider changes to the work processes and timescales to reduce or minimize communication between workers, realizing that this could affect the project schedule.

Possible measures may include:

- Reducing the size of working groups.
- Limiting the number of workers in the workplace (construction site) at any time.
- Adapting or reorganizing work processes for specific work activities and tasks to provide social distancing, and training workers in these processes.
- Consider changing the layout of the dining facility and introducing the phased mealtime to ensure social distancing and gradual access to and/or temporary restriction of access to leisure activities that may exist at the facility, including watching TV.

6. Measures to prevent disease risks at the construction site

The following measures must be followed to prevent the spread of COVID-19:

- Authorize the Health and Safety Officer to issue instructions to maintain the health and safety of all personnel who are allowed to enter and/or work on the site, and to take measures to prevent accidents (this may be the person responsible for occupational health, safety and the environment (OHSE));
- Issue the internal order "On the approval of the PIU notification scheme in the event of incidents at construction sites, on compliance with the requirements of COVID-19 precautionary measures."
- Provide a replacement for the OHSE officer in case of illness;

¹⁰ WHO-2019-nCoV-Adjusting_PH_measures-Mass_gatherings-2020, WHO

¹¹ Safety-well-being-workers-communities-covid-19, ADB

- Have daily pre-shift briefings for workers with a focus on COVID-19, including cough etiquette, hand hygiene and distancing measures, using demonstrations and methods with the involvement of others.
- Purchase infrared scanners and take the workers' temperature daily.
- Placing posters and signs all over the construction site, with images and text in Russian and Kyrgyz;
- Ensure the availability of the first aid kit for construction workers, in cooperation with local health authorities in the isolation wards, ambulances and any other specified medical services.
- Ensure the availability of handwashing products, disposable paper towels and closed trash cans in the key locations throughout the facility; where there is a toilet, a canteen, or food distribution or drinking water supply. It is also possible to use an alcohol-based disinfectant (based on 60-95% alcohol, if possible).
- In the event that a temporary or permanent workforce is recruited on a contract basis, take all necessary measures to prevent or minimize the spread of infectious diseases among permanent workers. It is necessary to provide a certificate from the medical institution at the place of residence that the employee is not under observation or quarantine.
- In case workers live home, it is necessary to take temperature daily at the beginning of work and limit their communication with residents of the local community.
- Carry out regular and thorough disinfection (cleaning) of all work facilities, including offices, living quarters, dining rooms, common areas;
- Provide cleaning personnel with appropriate cleaning equipment, materials and disinfectant;
- Organize preliminary discussions with specific health care providers to agree on what to do if referral of sick workers is needed.

7. Measures concerning the employees' own safety:

Employees shall:

- Take early steps to ensure their own safety in daily activities.
- Do not violate rules that may lead to the spread of the coronavirus infection;
- Do not disrespect the use of personal protective equipment, masks, respirators, gloves;
- Maintain personal hygiene with alcohol-based hand rub and hand washing.
- Site workers are required to minimize contact with people in the vicinity of the site and, in some cases, are prohibited from leaving the site during their contract to avoid contact with local residents.
- One should tell their supervisor or COVID-19 coordinator if they have symptoms or feel unwell.

8. Actions in case of illness of workers on the site

In case there are sick people at the construction site:

- If a worker has symptoms of COVID-19 (eg, fever, temperature, dry cough, fatigue), they should be removed from work immediately and quarantined on site.
- If the test is positive for COVID-19 or the test is not possible, the worker should remain isolated. This will be either in the workplace or at home. If isolation will occur at home, the worker must be transported to their home in the contractor's vehicle.
- Large-scale disinfection procedures with high alcohol disinfectants should be carried out in the worker's area prior to any further work on the site. The tools used by the worker must be disinfected with special means and the disposal of personal protective equipment accordingly.
- Employees (that is, employees with whom the sick employee was in close contact) should stop working and should be quarantined for 14 days, even if they do not have symptoms.

- The family and other close friends of the worker should isolate themselves for 14 days, even if they do not have symptoms.
- If COVID-19 is confirmed by a worker in the workplace, visitors should be prohibited from entering the facility and workgroups should be isolated from each other as much as possible.
- If workers live at home and have a family member with confirmed or suspected COVID-19 disease, the workers must isolate themselves and be kept away from the project site for 14 days, even if there are no symptoms.
- Workers should be paid for the entire period of illness, isolation or quarantine, if they are required to stop working, in accordance with the national legislation.

TEMPLATE OF SEMI-ANNUAL ENVIRONMENTAL MONITORING REPORT

Semi-annual Environmental Monitoring Report

Project Number: {XXXXXX}

{Reporting period: Month Year}

{Full Country Name}: {Project Title}

{(Financed by the <source of funding>)}

Prepared by {author(s)}

{Firm name}

{City, country}

For {Executing agency}

{Implementing agency}

Endorsed by: (staff name of IA/PIU) and signature, submission date

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Abbreviations

Include list of abbreviations used in the report

A. Introduction**Preamble**

1. This report represents the Semi - Annual Environmental Monitoring Review (SAEMR) for INSERT PROJECT NAME.
2. This report is the (insert number of report, i.e. 1st, 2nd etc) EMR for the project.

Headline Information

3. Include a brief summary of significant outcomes of the project construction process and any specific areas of concern of which ADB should be informed.

B. Project description and current activities**Project Description**

4. Provide a brief description of the project. – this should not vary from one report to the next.

Project Contracts and Management

5. Provide a list or table of main organisations involved in the project and relating to Environmental Safeguards. This should include lender, borrower, PIU, Main Contractor/s and significant sub-contractors, environmental staff of various organisations should be named, and contact details provided.
6. Provide a description of how the contracts are being managed and names of key personnel.

Project Activities During Current Reporting Period

7. Provide an outline of major activities which have been carried out during the current reporting period. Provide adequate information so the reader can understand what has been taking place on site. Include photographs (with date

stamp) of activities where possible and relevant. Place bulk photographs into an annex to the main report or a separate photographic record.

8. Where multiple work sites are involved provide information on which work sites have been active during the current reporting period. Provide map of work site areas if relevant.
9. Provide details (chart) of worker numbers (maximum, Minimum) in the current reporting period and anticipated changes in staff in following period
10. Highlight any significant new activities commenced during the current reporting period.
11. For the above make maximum use of charts, images and tables.

Description of Any Changes to Project Design

12. Describe any changes to the project design from that which was assessed in the Impact Assessment phase of the project and is set out in the Initial Environmental Examination/Environmental Impact Assessment. If none have taken place, please state
– No changes.
13. Note if significant changes have occurred the PIU should have already informed ADB of this and made a decision on the need for updates to the EIA/IEE and/or Environmental Management Plans

Description of Any Changes to Agreed Construction methods

14. Provide a description and reason for changes to any construction processes, for example, blasting of rock rather than excavation, open channel rather than thrust boring at road crossings.

C. Environmental Safeguard activities

General Description of Environmental Safeguard Activities

15. Please provide a summary of the routine activities undertaken by environmental safeguard staff during the current reporting period. This should include the work undertaken by the contractor's environmental manager, the Environmental Supervisor and any informal visits by the PIU environmental staff.

Site Audits

16. Please provide details (table form preferred) of any **formal** audits undertaken by environmental safeguard process staff during the current reporting period. This would include Contractors Environmental Manager, Environmental Supervisor, PIU Staff and ADB staff during review missions.
17. Information required includes:
 - Date of Visit
 - Auditors Name
 - Purpose of Audit
 - Summary of any Significant Findings
 - Cross reference to Audit Report which should be included as an annex.
18. Summarise Findings of Audits under taken in the current period, compare with

previous periods and identify any trends or common issues.

Issues Tracking (Based on Non-Conformance Notices)

19. Provide an overview and description of issues tracked during the current period.
20. Provide commentary on key statistics based on graphs and tables which can be copied from the Environmental Safeguards Issues Tracing Workbook. For example
21. Use data from workbook as required.

Trends

22. Use information from previous period reports and the current period information to identify trends in issues. For example -

Quarterly Report No	Total No of Issues	% issues Closed	% issues closed late
1	5	87	0
2	18	56	15
3	59	23	26

23. Provide a commentary on the trends, explain why they may be occurring and in the case of negative trends explain what steps have been taken to make corrections.
24. Provide a copy of all NCN' s for all major Non-Conformances in an annex. If none state this.

Unanticipated Environmental Impacts or Risks

25. Document any unanticipated environmental impacts and risks which have been identified in the current period (as a reminder, these are impacts or risks which were not identified in the Impact Assessment process). State what actions were taken to mitigate the impacts and risks, were these successful.

A. Results of environmental monitoring

Overview of Monitoring Conducted during Current Period

26. Provide a commentary on what environmental measurements have been undertaken during the current reporting period. Highlight any areas where agreed monitoring has not taken place.
27. Include sub sections for the report on those environmental media which have been measured, for example
 - Noise
 - Air Quality
 - Water Quality
28. The sections should present highlights of the outcomes of the monitoring focussing on a comparison of the results with the agreed standards as set out in the Specific Environmental Management Plan and/or Monitoring Plan.
29. In particular make clear where exceedances in the standards have occurred and

provide reasons and actions which have been implemented to correct – refer to relevant NCN as appropriate.

30. Detailed monitoring results should be presented as an annex.

Trends

31. Based on the current and past periods of monitoring identify and discuss any trends which may be developing.

Summary of Monitoring Outcomes

32. Provide any recommendations on the need for additional monitoring, or requests for ceasing/altering monitoring if activities have been completed or monitoring is showing no significant effects over long period.

Material Resources Utilisation

Current Period

33. Provide values (tables, graphs etc) for current reporting period of utilisation of electricity, water and any other materials which have been include in the SEMP for monitoring.

Cumulative Resource Utilisation

34. Provide values (tables, graphs etc) for cumulative resource utilisation of power water etc, for whole project life. Identify trends or significant changes and provide reasons for any such changes.

Waste Management

35. Provide summary of waste management activities during the current period. Provide waste contractors/s names and location of waste sites.

Current Period

36. Provide breakdown using graphs, table etc, of waste streams during current reporting period. This information should include
- Type of Waste (description and classification – e.g. hazardous – non-hazardous;
 - Waste Source – what activity generated the waste and where;
 - Quantity of waste generated;
 - Treatment/disposal route – provide information on quantities of waste reused, recycled and sent to landfill or incineration; and
 - Final disposal sites for waste.

37. Provide commentary on results.

Cumulative Waste Generation

38. Using the above bullet points for waste develop cumulative waste generation results.
39. Discuss trends and provide suggestions for waste reduction, increase in reuse and recycling if possible.

Health and Safety

Community Health and Safety

40. Provide information on any incidents which have occurred during the reporting period which resulted in or could have resulted in Community Health and Safety issues. Include within this section traffic accident.
- **Worker Safety and Health**
41. Provide detailed statistics on accident rates, including Lost Time Incidents, Accidents and near misses.
42. Provide information on safety campaigns conducted during the reporting period.

Training

43. Provide information on all environmental safeguard related training activities undertaken in this period and cumulatively for project life to date. These may include specific training of environmental staff, HSE inductions of site workers etc.
44. Discuss the need for additional training and what training is planned for coming quarter.

B. Functioning of the SEMP

SEMP Review

45. Provide a commentary on the SEMP in terms of the ability of the contractor to implement fully the requirements set out. Highlight any areas where the contractor has not been able to implement mitigation or monitoring measures.
46. Is the SEMP effective, are mitigation measures set out still appropriate and are they working as intended – do they need changing?
47. Are there better alternative mitigation measures?
48. Can some mitigation measures be reduced or removed as the specific risk identified in the IEE/EIA and/or SEMP has not materialised?
49. Provide a table of requests for changes to the current mitigation measures for consideration by ADB. Note you can send these at any time during the project, there is no need to wait until the quarterly reporting period to be completed. If PIU has supplied requests to ADB, these should be listed along with ADB response. Where changes (additions/deletions and modifications) of mitigation or monitoring measures have been approved, the PIU shall ensure that the SEMP is updated to reflect these changes.

C. Good practice and opportunity for improvement

Good Practice

50. Provide an overview with charts, images etc of examples of continuing good practice for the project. State why these have been implemented and how they are reducing environmental impacts or risks.

Opportunities for Improvement

51. Identify any areas which may be outside of the formal NCN process, but which changes to construction techniques, mitigation etc would result in an improvement in environmental, health and safety performance of the project.

D. Summary and recommendations

Summary

52. Provide a summary of the effective implementation of Environmental Safeguards during the reporting period and for the overall project construction period to date.

Recommendations

53. Provide any recommendations for consideration by the ADB for changes to the Environmental Safeguarding process for the project.