

# Environmental Assessment and Review Framework

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MON: Integrated Livelihoods Improvement and  
Sustainable Tourism in Khuvsgul Lake National Park  
Project

Prepared by the Government of Mongolia for the Asian Development Bank.

## CURRENCY EQUIVALENTS

(as of 13 October 2015)

Currency unit	–	togrog (MNT)
MNT1.00	=	\$0.000501
\$1.00	=	MNT1,997.00

## ABBREVIATIONS

ADB	–	Asian Development Bank
CSO	–	civil society organization
DEIA	–	detailed environment impact assessment
DENR	–	Department of Environment and Natural Resources Management
DPAM	–	Department of Protected Areas Management
EIA	–	environmental impact assessment
EMP	–	environmental management plan
GEIA	–	general environmental impact assessment
GOM	–	Government of Mongolia
GRM	–	grievance redress mechanism
KLNP	–	Khuvsgul Lake National Park
MEGDT	–	Ministry of Environment, Green Development and Tourism
PIU	–	project implementation unit
PMU	–	project management unit
PSC	–	project steering committee
SPS	–	safeguard policy statement

## GLOSSARY

<i>aimag</i>	–	province
<i>bagh</i>	–	subdistrict
<i>soum</i>	–	district

## NOTES

- (i) The fiscal year (FY) of the Government of Mongolia and its agencies ends on 31 December.
- (ii) In this report, “\$” refers to US dollars.

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## I. INTRODUCTION

1. This environmental assessment and review framework (EARF) is for *MON (48216) Integrated Livelihoods Improvement and Sustainable Tourism in Khuvsgul Lake National Park*, a four-year (2016–2019) project to support local livelihoods through improved capacity for sustainable tourism and subsistence activities. Under the Asian Development Bank's (ADB) Safeguard Policy Statement (SPS, 2009), the project is categorized as "C" for the environment i.e., it is anticipated to cause minimal or no adverse environmental impacts. No formal environmental assessment and management procedure is required for category C projects, although environmental implications need to be reviewed. This EARF reviews the environmental implications of the project and provides a simple framework for environmental management, monitoring, and reporting. The EARF has been prepared in compliance with ADB's SPS (2009) and in consideration of the Mongolian Law on Environmental Impact Assessment (2012).

2. The project is located in Khuvsgul Lake National Park (KLNP), in Khuvsgul *aimag* (province), northern Mongolia. (i) per capita income in five *soums* of Khuvsgul *aimag* increased; and (ii) management of natural resources in the KLNP improved. The expected project outcome will be livelihoods and sustainable tourism in five *soums* of the KLNP improved and integrated. The project has three outputs: (i) community-based tourism in Khatgal and Khankh settlements promoted; (ii) capacity for sustainable livestock and pasture management in the KLNP and buffer zone improved; and (iii) waste management around Khuvsgul Lake strengthened.

3. Output 1 will (i) establish the first pilot comanagement tourism group for the KLNP, comprising the KLNP Administration, communities, tour operators, and *soum* governments; (ii) develop a stakeholder vision, targets, and codes of practice for tourism; and (iii) promote and strengthen community-based tourism, including household-scale enterprises such as guiding, handicrafts, and the provision of food supplies to guest houses.

4. Output 2 will (i) establish herder groups among the herding families in the KLNP and buffer zone; (ii) establish herder management plans for each herder group that are tailored to local conditions, including optimal stocking densities and pasture management; and (iii) support income diversification for herder families, especially those with limited opportunities for tourism-based income. Output 2 will use scientific and traditional knowledge available for the KLNP to support the herder management plans and improved grazing practices.

5. Outputs 1 and 2 will be supported through a combination of specialist support, training, and the establishment of five community revolving funds (one per project *soum*). The funds will be community-managed and support household-scale enterprises, with 17% of the grant proceeds (an average of \$100,000 or 4% per *soum*) channeled into the funds.<sup>1</sup> Funds will be held in one bank account per *soum*. The project will provide financing expertise, training, and initial capital for the first 4 years for the communities to develop and manage the funds, including the establishment of fund committees, operating procedures, and repayment terms and conditions. Loans will be limited to activities compatible with outputs 1 and 2, the KLNP Management Plan, and domestic and ADB policies and regulations. The interest rate applied to loans will be low and reviewed regularly.<sup>2</sup> Interest repayments over the 4-year project duration will replenish the funds. The activity is aligned with Mongolia's Law on Buffer Zones, which provides a legal framework to support communities in protected areas and buffer zones.

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<sup>1</sup> A range of grant disbursement mechanisms were assessed, including the use of bank loans and/or credit unions.

<sup>2</sup> The rate will be slightly lower than the government's policy lending rate.

6. Output 3 will (i) implement a water quality monitoring program tailored to the project activities, including a rapid assessment of threats to the water quality of Khuvsgul Lake; (ii) establish a pilot community-led waste management program, including waste management teams, the installation of low environmental impact toilet facilities and litter bins, and the phasing in of public campsite fees to fund team salaries and facility operation and maintenance (O&M); and (iii) conduct a best-practice review on the internal zoning of the KLNP, including scientific and traditional knowledge and stakeholder consultation, to identify zones that maximize benefits to livelihoods, tourism, and conservation.

7. **Project management.** The executing and implementing agencies lack the personnel and resources needed to fully implement the project. The grant proceeds will also (i) establish the administrative framework for the project, including a steering committee, project management unit (PMU), and project implementation unit (PIU); and (ii) finance the specialist support and PMU and PIU operational costs required to implement outputs 1–3. The PMU and PIU will implement the project on behalf of the executing and implementing agencies, including accounting, procurement, training, preparation and dissemination of knowledge products, monitoring, and reporting.

8. No major environmental impacts by the project are anticipated. The project will support small-scale, household enterprises, including the provision of small equipment. The only facilities to be constructed will be small-scale eco-toilets, located in existing cleared public areas. The EARF will guide the process of screening proposed community enterprises to ensure alignment with protected area laws and the KLNP management plan, and, for the specific positioning of the facilities (to be identified in the first year of project implementation). The EARF: (i) describes the project and its outputs; (ii) assesses the potential environmental impacts of the project activities; (iii) specifies the procedures for screening and categorization of activities, meaningful consultation with stakeholders, and information disclosure requirements; and (iv) describes the institutional arrangements, and monitoring and reporting procedures.

## II. ASSESSMENT OF LEGAL FRAMEWORK AND INSTITUTIONAL CAPACITY

### A. Legal Framework of Mongolia

9. Mongolia has enacted a comprehensive policy and legal framework for environmental assessment and management. It has policies, legislation, and strategies in place to manage the protected estate, satisfy its international obligations, and to protect the quality of the environment for the health and well-being of its citizens. The hierarchy of policies and legislative provisions for environmental management in Mongolia comprises several layers ranging from the constitution to international treaties, and to environment and resources protection laws.

10. The basic principle of the Mongolian state environmental policy is that economic development must be in harmony with the extraction and utilization of natural resources, and that air, water, and soil pollution will be controlled. In April 1996, Mongolia's National Council for Sustainable Development was established to manage and organize activities related to sustainable development in the country. The country's strategy is designed for environmentally friendly, economically stable, and socially wealthy development, which emphasizes people as the determining factor for long-term sustainable development.

11. In recognition of its global responsibilities, Mongolia has acceded to a number of international environmental conventions (Table 1). Each convention places obligations on signatory governments ranging from the provision of a legislative basis for implementation,

adherence to the requirements and conditions of each convention, monitoring implementation performance on a regular basis, and reporting on a regular basis to the conference of parties.

**Table 1: International Environmental Conventions Signed by Mongolia**

<b>Convention</b>	<b>Year of Accession</b>
Stockholm Convention on Persistent Organic Pollutants.	2004
Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade	2000
Kyoto Protocol	1999
Convention on the Protection of Wetlands of International Importance (Ramsar)	1998
Convention on the Transboundary Movement of Hazardous Waste (Basel)	1997
UN Convention on Combating Desertification	1996
Vienna Convention for the Protection of the Ozone Layer	1996
Montreal Protocol on substances that deplete the ozone layer	1996
Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)	1996
UN Framework Convention on Climate Change	1994
Convention on Biological Diversity	1993
World Heritage Convention	1990

UN = United Nations.

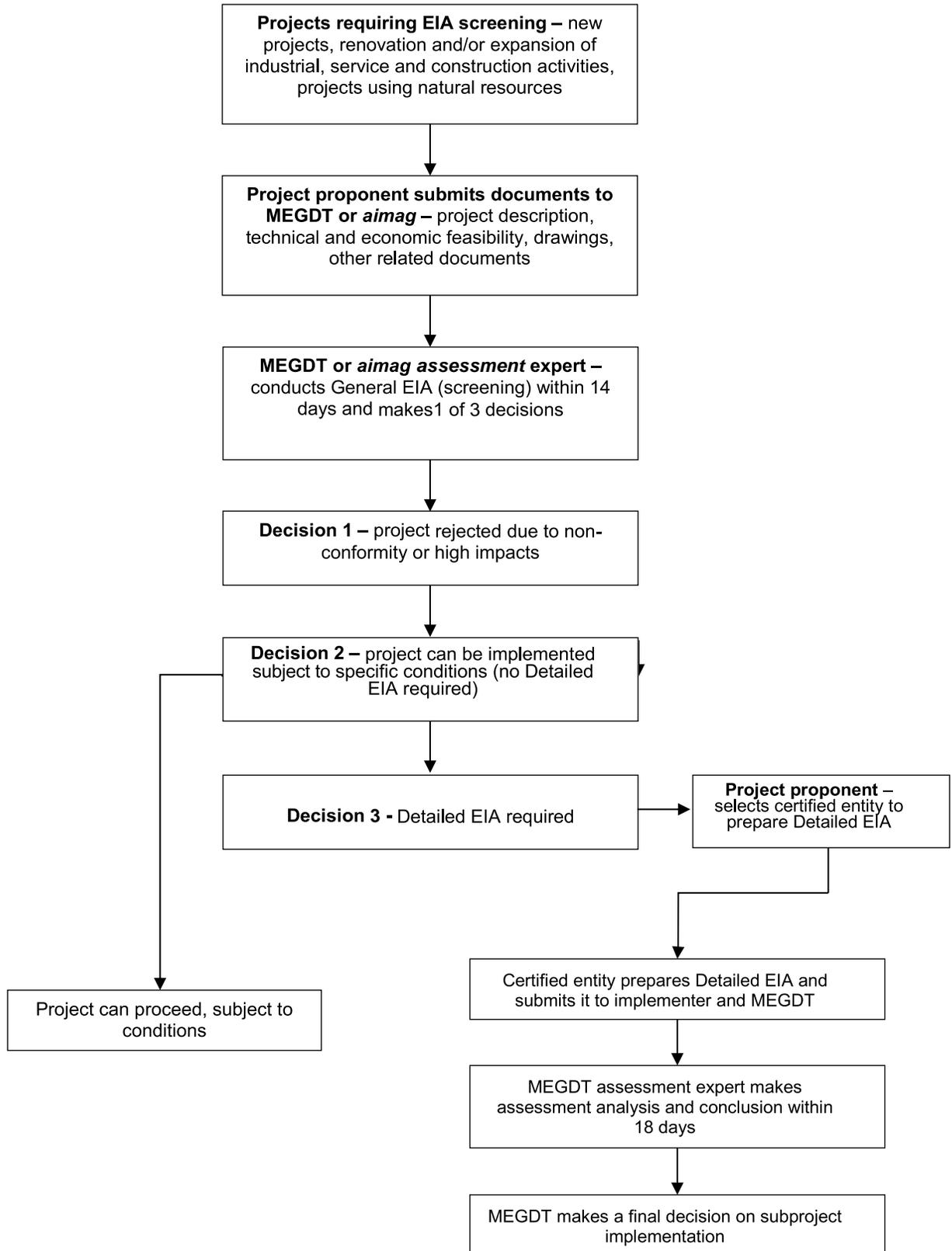
12. The Government of Mongolia undertook major reforms of environmental laws in the 1990s and again between 2002 and 2012, including laws of land, protected areas, water, forest, wildlife, and native flora resources. Laws relating to the environment are listed in Table 2.

**Table 2: Acting Laws Relating to the Environment**

<b>Resource Type</b>	<b>Law and Year of Passage</b>
Land Resources	Mongolian Law on Land, 1994, last amended in 2012
	Mongolian Law on Land Use Fees, 1997, renewed in 2002
	Mongolian Law on Land Ownership for Mongolian Citizens, 2002
	Mongolian Law on Regulation for Implementing the Land Law, 2002
	Mongolian Law on Subsoil, 1988
Forest resources	Mongolian Law on Forests, 1995, renewed in 2012
Water resources	Mongolian Law on Water, 1995, renewed in 2012
	Mongolian Law on Water Pollution Fees, 2012
	Mongolian Law on Mineral Water, 2003
Plant Resources	Mongolian Law on Plant Protection, 1996, amended in 2011
	Mongolian Law on Natural Plants, 1995, amended in 2012
Wildlife Resources	Mongolian Law on Fauna, 2000, revised in 2012
National Park Resources	Mongolian Law on Special Protected Areas, 1996, amended in 2004
	Mongolian Law on Buffer Zones, 1997
Conservation	Mongolian Law on Environmental Protection 1995, amended in 2012
	Mongolian Law on Environmental Impact Assessment, 1998, renewed in 2012
	Mongolian Law on Air, 1995, renewed in 2012
	Mongolian law on Hazardous and Toxic Chemicals, 2006
	Mongolian law on Hazardous and Chemical Toxic Waste, 2006
	Mongolian Law on Hydrology, Meteorology and Environmental Monitoring, 1997
	Mongolian Law on Cultural Heritage Protection, 2001, revised in 2005.
	Mongolian Law on Natural Resource Use Fees, revised in 2012
Other laws	Mongolian Law on Waste Disposal, 2012
	Mongolian Law on Sanitation, 1998
	Mongolian Law on Food, revised 2012
	Mongolian Law on Food Safety, 2012
	Mongolian Law on Labor Safety and Hygiene, 2008, last amended in 2012
	Mongolian Law on Fire Safety, 1999
	Mongolian Law on State Inspection, 2003

13. **Environmental assessment requirements of Mongolia.** The environmental impact assessment (EIA) requirements of Mongolia are regulated by the Law on Environmental Impact Assessment (1998, revised in 2012). The terms of the law apply to all new projects, as well as rehabilitation and expansion of existing industrial, service, or construction activities and projects that use natural resources. The purpose of the law is environmental protection, the prevention of ecological imbalance, the regulation of natural resource use, and the assessment of environmental impacts of projects and procedures for decision-making regarding the implementation of projects. The EIA process in Mongolia is summarized in Figure 1.

**Figure 1: Environmental Impact Assessment Process in Mongolia**



14. There are two types of EIAs defined under the Law on Environmental Impact Assessment (2012), as follows.

- (i) General EIA (GEIA). To initiate a GEIA, the project proponent submits to the Ministry of Environment, Green Development and Tourism (MEGDT) or *aimag* government a brief description of the project, including feasibility study, technical details, drawings, baseline description of the project environment, and a written opinion of the *soum* governor. These documents form the basis of the GEIA and MEGDT's assessment, which will have one of three conclusions: (a) project is rejected due to non-conformity with national laws and/or the severity of impacts; (b) project may proceed, subject to specific conditions, and (iii) a detailed EIA (DEIA) is necessary. Assessment by MEGDT generally takes 14 working days.
- (ii) Detailed EIA. The scope of the DEIA is defined in MEGDT's response for the GEIA. The DEIA is prepared by an accredited national entity. The DEIA is submitted by the project proponent to MEGDT and *aimag* government. The reviewer(s) of the GEIA also review the DEIA, generally within 18 working days, and present the findings to the MEGDT. Based on the content of the DEIA, reviewer conclusions, and any additional comments by MEGDT departments, MEGDT issues a decision on whether to approve or reject the project.

15. The DEIA is required to contain the following chapters: (i) environmental baseline data; (ii) analysis of extent and distribution of adverse impacts; (iii) measures to minimize, mitigate, and/or avoid impacts; (iv) alternative methods and technology; (v) risk assessment; (vi) environmental management plan (EMP); and (vii) stakeholder consultations, including potentially affected communities.

## **B. ADB Environmental Safeguard Requirements**

16. **Safeguard Policy Statement (SPS).** Environmental safeguards requirements, including EIA requirements, are defined in ADB's SPS (2009).<sup>3</sup> All projects funded by ADB must comply with the ADB's SPS (2009) to ensure they are (i) environmentally sound; (ii) designed to operate in compliance with applicable domestic regulatory requirements; and (iii) are not likely to cause significant environmental, health, or safety hazards. The SPS promotes international good practice as reflected in internationally recognized standards such as the World Bank Group's Environmental, Health and Safety Guidelines (2007).<sup>4</sup>

## **III. ANTICIPATED ENVIRONMENTAL IMPACTS**

17. This section summarizes the potential environmental impacts of the project, based on assessment of the planned activities under each output.

18. **Output 1: Community-based tourism in Khatgal and Khankh settlements promoted.** Activities under this output comprise non-structural measures of improving stakeholder coordination and co-management, strengthening tourism codes of practice for lake protection, and supporting small-scale household enterprises for local tourism. Local enterprises will include training and the provision of small equipment or gear for tourism guiding,

<sup>3</sup> ADB's SPS is available in English and Mongolian language at: <http://www.adb.org/documents/safeguard-policy-statement>; and, <http://www.adb.org/mn/documents/safeguard-policy-statement>

<sup>4</sup> <http://www.ifc.org/ifcext/enviro.nsf/Content/EnvironmentalGuidelines>

handicrafts, and improving the reliability of existing supply of dairy, meat, and vegetable products to guest houses. None of these activities involve construction. All activities will be screened against the project criteria to avoid environmental impacts and ensure alignment with the KLNP management objectives (Section IV). No environmental impacts are anticipated.

19. **Output 2: Capacity for sustainable livestock and pasture management in the KLNP improved.** Activities under this output comprise non-structural measures of improving the sustainability of livestock herding and pasture management, training, and household-based income diversification, especially for poor families in the buffer zone. This will include training and the provision of small equipment e.g. dairy processing units. All activities will be screened against the project criteria to avoid environmental impacts and ensure alignment with the KLNP management objectives (Section IV). No environmental impacts are anticipated.

20. **Output 3: Waste management around Khuvsgul Lake strengthened.** This output includes the installation of pilot eco-toilets. The specific number and location of these facilities will be identified in the first year of project implementation. All facilities will be: (i) small toilets and septic tanks, installed in existing tourism lodges and camps, homes, and/or existing public toilet blocks; (ii) located in existing public areas which are already cleared and subject to regular human activity; (iii) located in the KLNP Tourism and Limited Use Zones, in compliance with Mongolia's *Law on Special Protected Areas*, where small-scale facilities and human activities are permitted; (iv) non-flushing, composting systems which do not impose new pressures on water resources; (v) constructed above ground, on a small sealed surface, to avoid infiltration of waste products to soil or groundwater; (vi) made of pre-fabricated materials (e.g., toilet seats) and/or locally sourced materials from nearby towns; (vii) independently operated, and which do not require the construction of wastewater pipeline networks or treatment plants; (viii) maintained by the tour camp operators and/or residents according to clear operating procedures, including recycling of the sanitized waste products and/or disposal in the existing *soum* waste center (10 km south of Khuvsgul Lake); and (ix) climate resilient due to independence from the use of limited water resources, and, avoiding the mechanical impacts of freezing and thawing by being located above subsurface strata. None of these measures will cause environmental impacts to the KLNP. All are aimed at reducing existing pollution to soil and water from inadequate waste disposal and management.

21. In summary, (i) the project does not involve any major infrastructure construction or activities which could generate major environmental impacts, especially to the land, soil, and water resources of Khuvsgul Lake; (ii) project activities will comply with the KLNP Management Plan and Mongolia's *Law on Special Protected Areas* and *Law on Buffer Zones*; (iii) the installation of eco-toilets, and small-scale activities proposed during implementation, will be subject to the procedures of this EARF; and (iv) the project emphasis is on local livelihoods. All activities will be conducted with the participatory involvement of communities and other stakeholders.

22. **Environmental benefits.** The project is expected to achieve environmental benefits. Project activities contribute to the conservation objectives of the KLNP Management Plan (2014) and Mongolia's *Law on Special Protected Areas* and *Law on Buffer Zones*, by helping to improve the protection and management of land and water resources in a protected area. Improved stakeholder coordination and community-based tourism will increase the efficiency and sustainability of natural resource use in the park. Raising community capacity for livestock and pasture management will address current issues of over-grazing, declining grazing land, and associated land degradation. Strengthening local capacity for waste disposal and management will help address one of the greatest threats to the KLNP, pollution of Khuvsgul

Lake and its surrounding lands and streams due to unmanaged sewage. The project emphasis on stakeholder collaboration will strengthen park management by the park administration, communities, and local government.

#### IV. ENVIRONMENTAL ASSESSMENT FOR PROJECT ACTIVITIES

23. The project is category C for environment and only activities likely to have minimal or no adverse environmental impacts will be implemented. No environmental assessment and formal procedure is required for category C projects although environmental implications need to be reviewed. This section provides a simple procedure for screening of small-scale, household income diversification activities (under outputs 1 and 2) and installation of the pilot eco-toilet facilities (under output 3). The KLNP Administration (the implementing agency) and project implementation unit (PIU) (the latter under the project management unit, PMU) will have main responsibility to implement the EARF (Table 3).

#### STEP 1: SCREENING OF ENVIRONMENTAL IMPACTS

24. **Step 1.1. Exclusion criteria.** Activities which involve the following will not be supported by the project.

- (i) Involuntary resettlement, land acquisition, or influx of workers.
- (ii) Infrastructure construction and major civil works, including major earthworks, dams, irrigation, drainage works, roads, land clearance, or significant heavy vehicle traffic.
- (iii) Exposure to hazardous waste.
- (iv) Installation of facilities within 200 meters of Khuvsgul Lake.<sup>5</sup>
- (v) Intensification of land (and pasture) use with resulting environmental degradation.
- (vi) Intensification of forest use, including increase of net extraction of timber.
- (vii) Warrant classification as environment category A or B under ADB's SPS (2009).<sup>6</sup>
- (viii) Listed in ADB Prohibited Investment Activity List (Appendix 1).
- (ix) Require a Detailed EIA under Mongolia's *Law on Environmental Impact Assessment* (2012).
- (x) Impacts on the ecological or cultural values of the KLNP.
- (xi) Incompatible with the KLNP Management Plan, *Law on Special Protected Areas*, *Law on Buffer Zones*, or other relevant laws and policies.
- (xii) Incompatible with the project objectives for small-scale, household based enterprises which are environmentally friendly and support protection of the park's livelihood, cultural, biodiversity, and natural resource values.

25. **Step 1.2. National screening requirements—GEIA.** MEGDT has advised that the small-scale project activities, which are intended to result in environmental benefits, probably do not require a GEIA. This will be confirmed at the stage of detailed design. The implementing agency and PIU will submit the proposed project activities and designs to the MEGDT Department of Protected Areas Management (DPAM) (the executing agency). The DPAM will submit the designs to the MEGDT Department of Environment and Natural Resources

<sup>5</sup> In compliance with the national standard *MNS 6424: 2013 Eco-Tourism Development in Protected Areas*.

<sup>6</sup> 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. Category B: potential adverse environmental impacts are less adverse than those of category A projects. These 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 (ADB Safeguard Policy Statement, 2009).

Management (DENR), which will assess whether a GEIA is required. If a GEIA is required, the DPAM will request DENR to conduct the GEIA. The DPAM will provide the following information: (i) description of the project activity, location map, and designs; (ii) baseline environmental description of the project area; (iii) written opinion of the *soum* governor regarding relevance of the activity to local development programs; and (iv) copy of relevant certificates of land tenure and use. The DPAM and DENR, not the PMU, PIU, or project grant, will be responsible for preparation and submission of these materials, including payment for any required specialists or costs.

26. **Step 1.3. ADB screening requirements.** As a category C project, all planned activities, and any new activities that may be identified during implementation, must comply with the exclusion criteria in Step 1.1 and meet ADB's requirement of minimal or no adverse impacts. During preparation of the detailed designs for each activity, the PIU and PMU will provide a brief review with conclusions to the DPAM and ADB confirming that the activities conform to the scope of the project design and the reasons for why no environmental impacts are anticipated.

## STEP 2: PRE-CONSTRUCTION ACTIVITIES

27. **Step 2.1. Environment management plan.** A simple environmental management plan (EMP) has been prepared to mitigate any potential negative impacts and health and safety risks during project activities, including installation of the pilot eco-toilets (Appendix 2). The EMP includes basic requirements for implementation and supervision of works. It requires the contractor and/or community member(s) to plan for the activity, including work schedule and consultation with residents and other stakeholders, and defines prohibited activities, good environmental and housekeeping practices, occupational health and safety and community health and safety requirements, and reporting and communication requirements. The EMP will be included in the tender documents and attached to each civil works contract. The contractors are required to follow these requirements. It is anticipated that most (if not all) of the eco-toilets will be piloted by local residents and lodge owners, with local hired labor, rather than external contractors.

28. **Step 2.2. Preparation of tender documents and evaluation of bids.** Civil works and equipment will be procured in accordance with ADB's Procurement Guidelines (2015, as amended from time to time). The PIU will incorporate this EARF including the EMP (Appendix 2) and environmental clauses (Appendix 3) as specifications in the tender documents for contractors. The PMU will assist MEGDT in the bid evaluation process and assessing compliance with the specifications (to be documented in a bid evaluation report).

29. **Step 2.3. Preparation of contractor site-EMPs.** After contract awarding but before construction commencement, each civil work contractor will develop a small site-EMP based on the EMP, additional site investigations, and consultation with residents. If new environmental issues are identified, corresponding measures shall be defined in the site-EMP. The contractor shall assign the site manager to coordinate site-EMP implementation. No construction shall commence without clearance of the site-EMP by the DPAM.

30. **Step 2.4. Confirmation of project readiness.** After contract award but before construction commencement, the KLNP Administration and PIU shall check that: (i) the contractor has prepared a site-EMP which complies with the EMP and contract clauses (Appendices 2 and 3) and appointed the site manager as coordinator; and (ii) the contractor has disclosed information to local residents about the civil works and site-EMP.

31. Costs for the contractor and procurement of goods and works for installation of the eco-toilets, and/or small equipment for small-scale household livelihood activities, will be supported by the project grant.

### STEP 3: CONSTRUCTION (E.G., INSTALLATION) PHASE ACTIVITIES

32. **Step 3.1. Implementation of the site-EMP.** During construction, the contractor has overall responsibility for site-EMP implementation. The contractor will cover the costs for any required mitigation measures. The contractor will consult with the PIU, KLNP Administration, and residents as necessary so that stakeholders are informed of progress. The KLNP Administration and PIU will support the contractor with consultations (Table 3).

33. **Step 3.2. Supervision, site inspections, and public consultation.** During installation of facilities, the PIU and KLNP Administration will conduct regular site inspections to assess contractor compliance with the site-EMP. Inspections shall be at least twice a month, and follow the site inspection checklist for the project (Appendix 4). The PIU will fill out the checklist during these inspections and submit them to the KLNP Administration and PMU as part of the semi-annual progress reporting. In the event of any violations, accidents, or risks to the environment, the contractor will notify the KLNP Administration and PIU immediately. Public consultation will mainly rely on informal discussions with residents, guest house operators, and *soum* officials.

34. **Step 3.3. Construction completion, audits, and reporting.** At the end of construction, a completion audit will be conducted by the *soum* environment inspector to ensure the safety of each facility and conformity with the agreed design. Given the low impact and minor nature of the civil works, inspections will be conducted as needed. The PIU will prepare a brief completion report for the activity, including a copy of the inspector's certification of completion, and submit this with the project semi-annual reports.

### STEP 4: OPERATION PHASE

35. The completed facilities and/or livelihood equipment will be operated and maintained by the tour camp operators and residents respectively, according to operational procedures that will be designed by the relevant stakeholders with support from the PIU specialists. Composted waste in the eco-toilets will be recycled or transferred by sealed container to the *aimag* waste center. The KLNP Administration will conduct inspections of the facilities as needed.

## V. CONSULTATION, INFORMATION DISCLOSURE, AND GRIEVANCE REDRESS MECHANISM

### A. Consultation and Participation

36. Meaningful public consultation and participatory planning with stakeholders is a key approach for the project and is embedded in all project activities. Meaningful consultation is a process that (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as

project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

37. Consultations and meetings will be led by the pilot co-management group to be established under output 1, comprising community representatives, KLNP Administration, *soum* governments, and tour operators. Consultations will include other key stakeholders as necessary, especially civil society organizations (CSOs), will be culturally sensitive, and conducted in a manner commensurate with the impacts or benefits to affected communities. The consultation process shall also be used to introduce and discuss the project grievance redress mechanism (GRM; Section V.C).

38. Stakeholder consultations for the project shall be documented by the PIU and included in the project progress reports. This shall include details of any project-related environmental issues and concerns raised by stakeholders and how these will be addressed by the project. Proof of consultations such as attendance sheets, minutes of meetings and pictures shall be included in the documentation. A sample template for the consultation record is in Appendix 5.

## **B. Information Disclosure**

39. The PIU will be responsible for ensuring that: (i) all project public information, including results of consultations, is stored as part of the project record; and (ii) are made available to stakeholders, in a form, language and at a location in which they can be easily accessed by all stakeholders including affected people.

## **C. Grievance Redress Mechanism**

40. The PIU shall establish and maintain the project GRM to receive and facilitate resolution of any environment-related concerns or grievances about the project. The GRM will address affected people's issues promptly, using an understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to all stakeholders at no cost and without retribution. The GRM does not impede access to the national legal system. All project agencies (Table 3) will be aware of the GRM and inform the PIU of any complaints received. The GRM will be introduced during community consultations and made publicly available to stakeholders throughout the project. In the event of a grievance issue, up to three stages will be implemented, as follows.

- (i) Stage 1 (maximum 7 days): If a concern arises during construction, the affected person may raise the issue with the contractor, KLNP Administration, PIU, or community or *soum* representatives. All agencies will be aware of the GRM and will be requested to immediately report any incidents to the PIU. If the issue is resolved directly between the affected person and contractor, no follow-up is required.
- (ii) Stage 2 (maximum 7 days): If the issue is not resolved, the affected person can submit an oral or written complaint to the KLNP Administration. The KLNP Administration and PIU will reply within one week and keep a written record of the whole process.
- (iii) Stage 3 (maximum 10 days): If the issue is still not resolved, the PIU will, if agreed by the affected person, arrange a meeting with MEGDT, PIU, and relevant community and *soum* representatives to identify a solution. This

meeting, and implementation of the solution, will be achieved within 10 days. If the issue still cannot be resolved it will be referred to the relevant higher authorities. The PMU may report the process to ADB at any of Stages 1–3, but will do so immediately if Stage 3 is reached.

**VI. INSTITUTIONAL ARRANGEMENTS AND RESPONSIBILITIES**

41. Implementation and institutional arrangements for the project agencies, and roles and responsibilities, are summarized in Table 3. MEGDT’s DPAM is the executing agency. The KLNP Administration (comprising the park director and staff) is the implementing agency. A steering committee, chaired by the Director General of DPAM, will be established to guide the project and will include government agencies, CSOs, and community representatives. The DPAM and KLNP Administration will be supported by a PMU and PIU, based in Ulaanbaatar and the KLNP, respectively, which will comprise a team of individually contracted specialists. PMU and PIU staff costs will be supported by the project.

42. The PIU will be responsible for implementation of the EARF, supported by the KLNP Administration. The executing agency, and other relevant MEGDT departments, especially the DENR, will provide support when needed (Table 3). Due to the simple nature of this EARF and presence of qualified environmental staff within the MEGDT and KLNP Administration, no specialist environmental staff will be recruited in the PIU or PMU to implement this EARF. The requirement for application of this EARF to all project activities is included in the terms of reference for all PIU team members (see Appendix 1 of the Project Administration Manual). In the (unlikely) event a GEIA and DEIA (Section IV) are required, MEGDT, not the project, would be responsible for the provision and payment of any required specialist services and costs.

**Table 3: Project Institutional Arrangements, Agency Responsibilities, and other Participating Agencies**

<b>Executing agency:</b> MEGDT–DPAM	<ul style="list-style-type: none"> <li>• Assumes overall accountability and responsibility for project planning, management, and implementation</li> <li>• Ensures timely and effective execution of the grant agreement</li> <li>• Co-signs approval for withdrawal application from project imprest account (with MOF)</li> <li>• Submits progress reports to ADB</li> <li>• Facilitates auditing of project accounts</li> <li>• Chairs the PSC</li> <li>• Daily coordination with PMU</li> <li>• Overall guidance and support to implementing agency</li> <li>• Provides timely policy support</li> </ul>
<b>Implementing agency:</b> KLNP Administration of DPAM	<ul style="list-style-type: none"> <li>• Assumes direct accountability and responsibility for implementation of project outputs 1–3</li> <li>• Submit progress reports to executing agency</li> <li>• Member of the PSC</li> <li>• Coordinates the preparation and delivery of any domestic environmental or social safeguard requirements</li> <li>• Daily coordination with the PIU</li> <li>• Facilitate project stakeholder activities e.g., meetings and trainings with <i>soum</i> government, communities, tour operators</li> <li>• Review PIU progress reports</li> </ul>
<b>Oversight body:</b> PSC	<ul style="list-style-type: none"> <li>• Comprises 15 members: Director General of DPAM (Chair),</li> </ul>

	<p>MOF (1), KLNP Administration (1), Khuvsgul <i>aimag</i> government (1), five <i>soum</i> governments (one per <i>soum</i>),<sup>a</sup> Khatgal village (1), National University of Mongolia (1), Mongol Ecology Center (1), community representatives (one each for Khatgal and Khankh), and Khuvsgul Tourism Association (1)</p> <ul style="list-style-type: none"> <li>• Reviews and assesses project implementation progress and plans</li> <li>• Provides advice on policy matters related to the project</li> <li>• Meets at least semi-annually</li> </ul>
<b>PMU:</b> based at DPAM office in Ulaanbaatar	<ul style="list-style-type: none"> <li>• Comprising a project manager, implementation specialist, accountant, procurement specialist, and GIS specialist</li> <li>• Supports the executing agency for daily project coordination, planning, implementation, financial management, and procurement</li> <li>• Monitors project progress, including periodic site inspections and compliance with PAM, EARF, GAP, and other project documents</li> <li>• Prepares semi-annual project progress reports</li> </ul>
<b>PIU:</b> based at KLNP Administration in the park	<ul style="list-style-type: none"> <li>• Comprising a project field coordinator, Khankh officer, driver, and full-time and/or part-time specialists (Appendix 1)</li> <li>• Under the supervision of the PMU, supports the implementing agency to implement the project field activities</li> <li>• Ensures compliance with the EARF, GAP, and other project documents. For the EARF, this includes screening procedures, GRM, and compliance with EMP requirements</li> </ul>
<b>ADB</b>	<ul style="list-style-type: none"> <li>• Oversees project administration and timely execution of the grant agreement by the executing and implementing agencies</li> <li>• Disburses loan proceeds</li> <li>• Reviews and, as needed, approves procurement, consultant recruitment, progress reports, and audit reports</li> <li>• Reviews project compliance and targets against the DMF, EARF, GAP, PAM, and community funds screening criteria</li> <li>• Monitors project progress and conducts review missions</li> <li>• Disclose monitoring reports on ADB public website</li> <li>• Observer to the project steering committee</li> </ul> <p><b>Coordination with EOJ in Mongolia, JICA, and ADB's OCO–Japan team</b></p> <ul style="list-style-type: none"> <li>• Invite EOJ, JICA, and OCO–Japan team to project events and missions (for OCO, inform up to 4 months ahead)</li> <li>• Inform on project progress and provide key reports and materials</li> <li>• Inform and/or discuss potential changes in scope</li> <li>• Respond to inquiries and/or information requests</li> <li>• Support donor visibility for dissemination of outcomes and lessons</li> </ul>
<b>Other participating agencies</b>	
MOF	<ul style="list-style-type: none"> <li>• Represents GOM for grant negotiations</li> <li>• Signs grant agreement and project approval on behalf of GOM</li> <li>• Co-signs withdrawal applications from project imprest account</li> </ul>

	<ul style="list-style-type: none"> <li>together with MEGDT</li> <li>Reviews project progress and/or audit reports as needed</li> </ul>
MEGDT–EFPD	<ul style="list-style-type: none"> <li>Provides oversight support to the executing agency for project financial management</li> <li>Facilitates independent financial auditing of the project</li> </ul>
MEGDT– Department of Environment and Natural Resources	<ul style="list-style-type: none"> <li>Responsible for national environmental planning, conducting GEIAs, and assessment of DEIAs</li> <li>For this project, will assess the need for GEIA for project activities and, if required, prepare the GEIA(s)</li> </ul>
Khuvsgul <i>aimag</i> governor’s office	<ul style="list-style-type: none"> <li><i>Aimag</i>-level support and coordination</li> <li>Coordination of the participating <i>soum</i> governments</li> </ul>
<i>Soum</i> government officers – agricultural, environment, and forestry technicians	<ul style="list-style-type: none"> <li>The five project <i>soums</i> will be represented by at least one counterpart officer per <i>soum</i> or village</li> <li>Participate in project planning and training</li> <li>Facilitate coordination between <i>soum</i>, community, and project</li> <li>Report project progress to the <i>soum</i> and village governments</li> </ul>
GASI–environment, health and safety inspectors	<ul style="list-style-type: none"> <li>In general, four to six inspectors at <i>aimag</i> level and one to two at <i>soum</i> level</li> <li><i>Soum</i> environment, health, and safety inspectors will inspect project facilities and issue completion certificates</li> </ul>
CSOs and other donors	<ul style="list-style-type: none"> <li>Project will collaborate and coordinate with existing donor efforts at KLNP, including MEC, NUM, and KfW program</li> <li>MEC and NUM are members of the project steering committee</li> </ul>
Civil works contractors	<ul style="list-style-type: none"> <li>To be identified during project implementation</li> <li>Ensure that bidding documents respond to the requirements of the EARF and GAP as relevant for construction works</li> </ul>
Embassy of Japan in Mongolia	<ul style="list-style-type: none"> <li>Represents the Government of Japan and JFPR fund</li> <li>Observer to the steering committee</li> <li>May choose to attend project events, meetings, and field sites</li> <li>Guidance and feedback on Japanese visibility in project activities</li> </ul>

ADB = Asian Development Bank, CSO = civil society organization, DEIA = detailed environmental impact assessment, DMF = design and monitoring framework, DPAM = Department of Protected Areas Management, EARF = environmental assessment and review framework, EFPD = Economic, Financial and Planning Division, EMP = environmental management plan, EOJ = Embassy of Japan, GAP = gender action plan, GASI = General Agency for Specialized Inspection, GEIA = general environmental impact assessment, GIS = geographic information systems, GOM = Government of Mongolia, GRM = grievance redress mechanism, JFPR = Japan Fund for Poverty Reduction, JICA = Japan International Cooperation Agency, KLNP = Khuvsgul Lake National Park, MEC = Mongol Ecology Center, MEGDT = Ministry of Environment, Green Development and Tourism, MOF = Ministry of Finance, NUM = National University of Mongolia, OCO = Office of Cofinancing Operations, PAM = project administration manual, PIU = project implementation unit, PMU = project management unit, PSC = project steering committee.

## VII. MONITORING AND REPORTING

43. **Monitoring.** Due to the minor scope of works, no detailed environmental monitoring (e.g., water and air quality) will be implemented. Instead, an environmental supervision checklist (Appendix 3) will be used to monitor compliance of contractors with the site-EMPs. This will be complemented by the water quality monitoring program to be established by the project (under output 3). The program will include sections of Khuvsgul Lake subject to point-source pollution from tour camps, including sites at which the eco-toilets will be piloted.

44. **Reporting.** The PIU will provide semi-annual project progress reports to the PMU. The PMU will review and compile these, and provide semi-annual progress reports to the DPAM, project steering committee, and ADB. These progress reports will document: (i) project implementation status; (ii) status of financial management; (iii) results of procurement for goods and works; (iv) results of project activities (e.g. training); (v) analysis of any monitoring data against relevant standards; (vi) implementation of the EARF (e.g., environmental mitigation measures implemented, construction monitoring, contractor performance, completion inspections, any incidents or complaints received, GRM implementation, and what corrective actions were undertaken). Given the small and simple scope of this EARF, separate environmental reports to ADB, and more frequent reporting (e.g., quarterly) is not required.

45. **Documentation and data storage.** The PIU will be responsible for maintaining systematic and organized records for all project information, including environmental documents and reports.

## ADB LIST OF PROHIBITED INVESTMENT ACTIVITIES

1. The use of ADB funds is strictly prohibited for the following activities (ADB's Safeguard Policy Statement, 2009).

- (i) Production or activities involving harmful or exploitative forms of forced labor<sup>7</sup> or child labor.<sup>8</sup>
- (ii) Production of or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements or subject to international phase-outs or bans, such as (a) pharmaceuticals,<sup>9</sup> pesticides, and herbicides,<sup>10</sup> (b) ozone-depleting substances,<sup>11</sup> (c) polychlorinated biphenyls<sup>12</sup> and other hazardous chemicals,<sup>13</sup> (d) wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora,<sup>14</sup> and (e) transboundary trade in waste or waste products.<sup>15</sup>
- (vii) Production of or trade in weapons and munitions, including paramilitary materials.
- (viii) Production of or trade in alcoholic beverages, excluding beer and wine.<sup>16</sup>
- (ix) Production of or trade in tobacco.
- (x) Gambling, casinos, and equivalent enterprises.
- (xi) Production of or trade in radioactive materials,<sup>17</sup> including nuclear reactors and components thereof.
- (xii) Production of, trade in, or use of unbonded asbestos fibers.<sup>18</sup>
- (xiii) Commercial logging operations or the purchase of logging equipment for use in primary tropical moist forests or old-growth forests.
- (xiv) Marine and coastal fishing practices, such as large-scale pelagic drift net fishing and fine mesh net fishing, harmful to vulnerable and protected species in large numbers and damaging to marine biodiversity and habitats.

<sup>7</sup> All work or services not voluntarily performed i.e. extracted from individuals under threat of force or penalty.

<sup>8</sup> Employment of children whose age is below the host country's statutory minimum age of employment, or, in contravention of International Labor Organization Convention No. 138 "Minimum Age Convention" (www.ilo.org).

<sup>9</sup> A list of pharmaceutical products subject to phaseouts or bans is available at <http://www.who.int>.

<sup>10</sup> A list of pesticides and herbicides subject to phaseouts or bans is available at <http://www.pic.int>.

<sup>11</sup> A list of the chemical compounds that react with and deplete stratospheric ozone resulting in the widely publicized ozone holes is listed in the Montreal Protocol, together with target reduction and phaseout dates. Information is available at <http://www.unep.org/ozone/montreal.shtml>.

<sup>12</sup> A group of highly toxic chemicals. Likely to be found in oil-filled electrical transformers, capacitors, and switchgear dating from 1950 to 1985.

<sup>13</sup> A list of hazardous chemicals is available at <http://www.pic.int>.

<sup>14</sup> A list is available at <http://www.cites.org>.

<sup>15</sup> As defined by the Basel Convention; see <http://www.basel.int>.

<sup>16</sup> Does not apply to project sponsors who are not "substantially involved" in these activities i.e. the activity concerned is ancillary to a project sponsor's primary operations.

<sup>17</sup> Does not apply to the purchase of medical equipment, quality control (measurement) equipment, and any equipment for which ADB considers the radioactive source to be trivial and adequately shielded.

<sup>18</sup> Does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is <20%.

## ENVIRONMENTAL MANAGEMENT PLAN (EMP)

This EMP is developed for the *Integrated Livelihoods Improvement and Sustainable Tourism in Khuvsgul Lake National Park* project. It defines the basic requirements for implementation and supervision of minor civil works. The EMP requires the contractor to plan for construction, including consultation with potentially affected stakeholders e.g. nearby communities. It also defines good environmental and housekeeping practices, occupational and community health and safety requirements, and communication requirements. The EMP will be included in the tender documents and will form part of all civil works contracts. Contractors are expected to follow these requirements and develop site-specific EMPs (site-EMPs) for implementing these measures. The contractors will be made aware of their obligations to comply with this EMP, and to budget EMP implementation costs in their bids.

**Table EMP-1: Environmental Management Plan**

Potential Issues	Mitigation measures	Implementing Agency	Supervising Agency	Monitoring Indicators
<b>PRE-CONSTRUCTION PHASE</b>				
Institutional strengthening	<ul style="list-style-type: none"> <li>Establish PMU and PIU</li> </ul>	IA	executing agency, ADB	PMU, PIU established
Design of livelihood activities and eco-toilets	<ul style="list-style-type: none"> <li>Review proposed activity against exclusion criteria (Section IV) and submit screening results and conclusions to KLNP Administration, PMU, DPAM, and ADB for review</li> <li>For the eco-toilets, utilize pre-fabricated or locally-sourced materials (e.g. from Khuvsgul <i>aimag</i> and/or Ulaanbaatar) to minimize on-site construction works and duration</li> <li>Designs are to maximize environmental sustainability and climate resilience. For eco-toilets: (i) non-flushing, composting systems with no water needs; (ii) dimensions based on numerous available models, tailored to site; (iii) construct on a sealed surface above ground to avoid infiltration of waste products to soil or groundwater, and mechanical damage from freezing/thawing; (iv) clear operating procedures, including recycling of the sanitized waste products and disposal in the <i>soum</i> waste center</li> </ul>	PIU ecotourism specialist, design contractor	PIU, IA	Designs comply with GASI environment, health and safety standards
Bidding documents and contractors qualifications	<ul style="list-style-type: none"> <li>Include EARF as annex to Requests for Proposals</li> <li>Ensure that civil works contracts are responsive to this EMP and that mitigation and monitoring measures are budgeted</li> </ul>	PIU, IA	executing agency, ADB	Tender and documents, civil works contracts
Site-EMP	<ul style="list-style-type: none"> <li>Contractor develops a site-EMP, responding to all clauses and requirements of this EMP</li> <li>On-site manager responsible for coordinating the site-EMP</li> <li>Contractor shall ensure adequate resources are available to implement site-EMP throughout construction</li> </ul>	Contractor	PIU, IA	Site-EMP approved by PIU
Permits and licenses	<ul style="list-style-type: none"> <li>Contractor will secure any necessary permits and licenses before undertaking the works</li> <li>Contractor will comply with all domestic laws and regulations, especially guidelines for working in protected areas (as provided by KLNP Administration)</li> </ul>	Contractor	PIU, IA	Copy of approved permits and licenses
Information disclosure, hotline	<ul style="list-style-type: none"> <li>Contractor shall display contact details at the site</li> <li>Contractor shall disseminate in timely manner information on construction progress, including anticipated risks or public disturbances e.g. noise</li> </ul>	Contractor	PIU, IA	PIU progress report
<b>CONSTRUCTION PHASE</b>				
Prohibited activities	<ul style="list-style-type: none"> <li>The contractor will not: (i) remove or disturb any vegetation, natural habitats, flora, fauna, or cultural heritage objects; (ii) spill any pollutants e.g. petroleum products; (iii) burn any wastes; (iv) dispose of rubbish or construction wastes in KLNP; (v) drink alcohol during working hours</li> </ul>	Contractor	PIU, IA	PIU progress report
Construction	<ul style="list-style-type: none"> <li>If necessary, erect simple drains around site perimeter to</li> </ul>	Contractor	PIU, IA	PIU progress

Potential Issues	Mitigation measures	Implementing Agency	Supervising Agency	Monitoring Indicators
and worker wastewater and sewage	<ul style="list-style-type: none"> <li>prevent runoff of any construction water and rainwater</li> <li>Provide adequate number of portable latrines for workers. Upon completion, remove all worker sewage</li> <li>Workers are not to use natural habitats in park as toilets</li> <li>Provide garbage receptacles at construction site</li> </ul>			report, GASI inspection form
Construction and worker solid waste	<ul style="list-style-type: none"> <li>Store all materials in small areas to minimize area of construction disturbance</li> <li>Cover materials with tarpaulin to avoid runoff of oils or other chemicals from machinery during rains</li> <li>Upon completion, remove all construction waste materials</li> <li>Recycle as many materials as possible</li> <li>Dispose remaining materials in Khatgal or Murun landfills</li> <li>Prohibit burning of waste</li> </ul>	Contractor	PIU, IA	PIU progress report, GASI inspection form
Construction noise	<ul style="list-style-type: none"> <li>Maintain equipment and machinery in good working order</li> <li>Operate between 07:00–22:00 subject to agreement with residents and/or other stakeholders</li> <li>Communicate with residents to seek any feedback or suggestions on noise disturbance</li> <li>Overall risk is small due to minor nature of the civil works</li> </ul>	Contractor	PIU, IA	PIU progress report, GASI inspection form
Air pollution (construction dust, machinery and vehicle air emissions)	<ul style="list-style-type: none"> <li>Prohibit the use of any large machinery</li> <li>Maintain well-kept machinery to minimize exhaust emissions</li> <li>Avoid clearance of any existing vegetation or habitats</li> <li>Overall risk is small due to minor nature of the civil works</li> </ul>	Contractor	PIU, IA	PIU progress report, GASI inspection form
Occupational health and safety	<ul style="list-style-type: none"> <li>Provide safe supply of clean water for workers</li> <li>Provide personal protection equipment for workers in accordance with relevant health and safety regulations</li> <li>Establish emergency response procedures to address any accidents or emergencies and include these in the site-EMP</li> <li>Document occupational accidents, diseases, and incidents</li> <li>Display emergency contact numbers for local fire, medical and police services in a prominent place</li> </ul>	Contractor	PIU, IA	PIU progress report, GASI inspection form, number of incidents
Community health and safety	<ul style="list-style-type: none"> <li>Identify potential risks or disturbance to residents and/or disruption to services</li> <li>If necessary, develop measures to minimize disruption, include these in the site-EMP, and communicate them (including dates, duration) in advance to all affected people</li> <li>Display signs at construction sites to warn general public of potential hazards e.g. equipment, materials</li> <li>Secure all construction sites, especially at night</li> </ul>	Contractor	PIU, IA	PIU progress report, GASI inspection form, number of incidents
Grievance Redress Mechanism	<ul style="list-style-type: none"> <li>Contractor to immediately report any complaints received, to PIU and KLNP administration</li> <li>Workers to be aware of GRM and report to on-site construction manager immediately if they receive complaints</li> <li>Workers to be instructed to treat residents with respect</li> </ul>	Contractor, PIU	PIU, IA	PIU progress report, number of incidents and complaints
<b>OPERATION PHASE</b>				
Management of human waste at eco-toilets	<ul style="list-style-type: none"> <li>Implement the operational procedures developed at design stage: (i) removal using hygiene safety gear; (ii) transport to Khatgal landfill in sealed containers</li> </ul>	Community management team	PIU, IA	IA progress report
Small-scale tourism and/or agricultural activities	<ul style="list-style-type: none"> <li>Maintain project equipment as per operational procedures developed at design stage</li> <li>Implement herding plans</li> <li>With PIU, review procedures and revise if needed</li> </ul>	Residents, families	PIU, IA	IA progress report

DPAM = Department of Protected Areas Management, EARF = environmental assessment and review framework, GASI = General Agency for Specialized Inspection, IA = implementing agency (KLNP Administration), KLNP = Khuvsgul Lake National Park, PIU = project implementation unit, PMU = project management unit.

## ENVIRONMENTAL SAFEGUARD CLAUSES FOR CIVIL WORKS CONTRACTS

The general environment, health and safety obligations of the Contractor within this Contract, without prejudice to other official provisions in force, shall include the following.

- The Contractor shall ensure that the construction of project facilities comply with (a) all applicable laws and regulations of Mongolia relating to environment, health and safety; (b) the environmental safeguards stipulated in ADB's Safeguard Policy Statement (2009); and (c) all measures and requirements described in the EMP (Appendix 3 of this EARF).
- The Contractor shall prominently display contact details at the sites. The Contractor shall disseminate information on construction progress in a timely manner, including anticipated activities that might cause safety risk.
- The Contractor shall implement the relevant actions of the project grievance redress mechanism (GRM). This includes: responding to any complaints within seven days; if the issue is not resolved, following up immediately with the PIU and KLNP Administration and resolving it within seven days; or if still not resolved, following the subsequent advice given by the KLNP administration and PIU in accordance with Stages 1–3 of the GRM.
- The Contractor shall ensure that all workers treat residents and other stakeholders with respect, and undertake their work and behavior in a culturally respectful manner.
- The Contractor shall secure the necessary permits and licenses before undertaking the works.
- The Contractor shall assign the responsibility for coordination of the site-EMP to the site manager, and ensure that sufficient resources are available to implement the site-EMP.
- The Contractor shall provide equal pay for equal work, regardless of gender or ethnicity; provide those they employ with a written contract; provide the timely payment of wages; use local unskilled labor, as applicable; comply with core labor standards and applicable labor laws and regulations, including stipulations related to employment, e.g. health, safety, welfare, workers' rights, and anti-trafficking laws; and not employ child labor. Contractors shall maintain records of labor employment, including the name, ethnicity, age, gender, domicile, working time, and the payment of wages.
- The Contractor shall take necessary precautions to avoid damage to Khuvsgul Lake and other natural habitats, and interruptions to water supply, wastewater collection, heating and other utility services during the civil works.
- The Contractor shall prepare a site-EMP based on the EMP in Appendix 2.
- The Contractor shall take appropriate action against personnel not complying with these clauses and EMP.
- The Contractor shall document and report to the PIU any incidents caused by the works.
- The Contractor shall inform the PIU of any unanticipated environmental, health and safety risks or impacts that may arise during implementation of the contract.

## ENVIRONMENTAL SITE INSPECTION CHECKLIST

*Note: This form is designed for use by the project implementation unit (PIU) and/or GASI<sup>19</sup> environmental, health, and safety inspectors during site inspections, and may not be exhaustive. Modifications and additions may be necessary to suit individual project activities and to address any specific environmental issues.*

Location: \_\_\_\_\_  
 Inspection Date: \_\_\_\_\_  
 Inspection Time: \_\_\_\_\_  
 Inspector(s): \_\_\_\_\_

Inspection Item	Yes	No	N.A.	Remarks (i.e. problem observed, possible cause of problem, and/or proposed corrective/ preventative actions)
1. Has contractor appointed a construction supervisor and is the supervisor on-site?				
2. Is information pertaining to construction disclosed at construction site (construction period, contractor information, etc.)?				
3. Are chemicals/hazardous products and waste stored on impermeable surfaces in secure, covered areas?				
4. Is there evidence of oil spillage?				
5. Are chemicals stored and labeled properly?				
6. Is construction equipment well maintained? (any black smoke observed)				
7. Is there evidence of excessive dust generation?				
8. Are there enclosures around the main dust-generating activities?				
9. Does contractor regularly consult with residents to identify concerns?				
10. Is there evidence of excessive noise? If yes, describe location and equipment.				
11. Any noise mitigation measures adopted (e.g. use noise barrier / enclosure)?				
12. Is construction wastewater and domestic wastewater discharged to sewer systems (if possible), or are on-site treatment facilities (e.g. septic tank, portable latrine) provided?				
13. Is there any wastewater discharged to soil or surface water?				
14. Is the site kept clean and tidy? (e.g. litter free, good housekeeping)				
15. Are separated labeled containers/ areas provided for facilitating recycling and waste segregation?				
16. Are construction wastes / recyclable				

<sup>19</sup> Mongolia's General Agency for Specialized Inspection.

Inspection Item	Yes	No	N.A.	Remarks (i.e. problem observed, possible cause of problem, and/or proposed corrective/ preventative actions)
wastes and general refuse removed off site regularly?				
17. Have hazardous wastes been identified (such as asbestos, PCBs)?				
18. Is safe supply of clean water and an adequate number of latrines provided for workers?				
19. Is personal protection equipment (PPE) provided for workers?				
20. Are clear information and warning signs placed at construction sites?				
21. Are construction sites secure, to discourage access?				
22. Are fire extinguishers / fighting facilities properly maintained and not expired? Escape not blocked / obstructed?				
23. Is there any evidence of damage to vegetation, habitats, Khuvsgul Lake, or streams?				
24. Are disturbed areas properly re-vegetated after completion of works?				
25. Any other problems identified or observations made?				

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Date, Name and Signature of GASI Inspector or PIU staff member

