

### DETAILED SAFEGUARDS PROGRAM ACTIONS

	Gap	Proposed Action	Indicators or Targets	Responsibility	Time Frame/Reporting
<b>Environment</b>					
1	Environmental categorization	IA to submit program REA checklists and proposed categorization to ADB for all subprojects under the program.  Environment Category A projects to be excluded.	Project REA checklists accepted and categorization confirmed by ADB.  No Category A projects approved for implementation.	IA, supported by TA consultants.	During project environmental assessment, REA checklists will be included in the semi-annual environmental monitoring reports to be submitted to ADB.
2	Area of Influence	In addition to relevant PRC technical guidelines, the definition of project area of influence in EITs to be based on based on potential impacts. In case of inconsistency, the definition which defines the larger area shall be adopted.	Area of influence in project EITs defined based on potential impacts as well as relevant PRC technical guidelines (whichever is larger shall be adopted).	EIT Institutes, supported by TA consultants.	During project environmental assessment
3	Existing Facilities	Compliance audit of existing facilities to be undertaken, if relevant.	Compliance audits of existing facilities included in project EITs, if relevant.	EIT Institutes, supported by TA consultants.	During project environmental assessment
4	Associated Facilities	Assessment of associated facilities, if relevant.	Assessment of associated facilities included in project EITs, if relevant.	EIT Institutes, supported by TA consultants.	During project environmental assessment
5	Climate Change	Assessment of climate change risks.	Climate Risk Assessment (CRA) incorporated into project EITs.	EIT Institutes, supported by TA consultants.  ADB to provide CRA	During project environmental assessment
6	Physical and Cultural Resources (PCRs)	Assessment of PCRs.	PCR assessment and Chance Find Procedure incorporated into project EITs.	EIT Institutes, supported by TA consultants.	During project environmental assessment
7	Analysis of Alternatives	Analysis of alternatives to the project's location, design, technology, and components, including no	Analysis of alternatives incorporated into project EITs.	EIT Institutes, supported by TA consultants.	During project environmental assessment

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		project option.			
8	Environmental Management Plan (EMP)	EMP including adverse environmental impacts and risks; mitigation measure; environmental monitoring program; reporting; implementation arrangements; schedule; budget; and EMP performance indicators	EMP included within project EITs.  EMP provisions incorporated into construction contracts.	EIT Institutes, supported by TA consultants.	During project environmental assessment and program implementation
9	Public Consultation	Meaningful public consultation.	Meaningful public consultation incorporated into project EITs and during project implementation.	EIT Institutes, supported by TA consultants.	During project environmental assessment and program implementation
10	Disclosure	Disclosure of the environmental assessment reports in English  Disclosure of semi-annual environmental monitoring reports	Environmental assessment reports in English of the first three subprojects disclosed on ADB website.  Environmental monitoring reports disclosed on ADB website, IA websites.  Information from the EITs provided to affected people and other stakeholders	IA	Provide environmental assessment reports in English of the first three subprojects to ADB for disclosure within 15 days of obtaining domestic approval.  During project environmental assessment and implementation
11	Inadequate institutional arrangements and staffing for environmental management	Safeguards Unit in charge of environmental safeguard coordination and management	Safeguards Unit established.  Safeguards Unit has adequate qualified environmental staff.	IA	By December 2019
12	Inadequate	Conduct workshop(s) for	Workshop(s) and	PMO and qualified	Workshop(s) and

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	capacity for environment management and coordination	staff of the PMO and IA with environmental management responsibilities, contractors and CSCs, covering (i) environment screen and categorization, (ii) EMP scope, (iii) incorporation of EMP provisions into bidding documents and construction contracts, (iv) EMP implementation and monitoring during construction and operation phases, (v) public engagement and information disclosure, and (vi) GRM	trainings held and summary report accepted by ADB	consultant to design and lead workshop(s)	training(s) held by March 2020, and will continue throughout program implementation
13	Inadequate monitoring of and reporting on EMP implementation	CSC to monitor daily and report monthly to IA based on established reporting template. IA to conduct monthly construction site and operation site inspections based on established checklist.	Monitoring and reporting requirements, including checklist, incorporated into the PID.  Semiannual environmental monitoring reports submitted to ADB	IA supported by CSC and TA consultants.	Monitoring requirements incorporated into the PID before program approval.  Monitoring and reporting ongoing throughout construction phase and operation phase
14	Grievance redress procedure limited to hotline system managed by EEB	IA formalizes a locally accessible program GRM, supplemental to the environmental hotline system.	GRM arrangements posted on relevant websites, and at project construction sites and operation sites	IA	Established by December 2019
<b>Involuntary Resettlement</b>					
1	Screening and categorization	Prepare involuntary resettlement impact categorization checklist for all subprojects	All IR categorization checklists are prepared.	PMO with support from resettlement institute and project implementation consultants.	The screening and categorization forms and Safeguard Reports for Category C will be included in the semi-

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		<p>Category A projects to be excluded.</p> <p>For Category C projects, Preparation of Subproject Safeguard Report as per Social Safeguard Technical Guideline which has the following attachments: (i) Screening and categorization form which includes confirmation that there are no outstanding or legacy issues, (ii) Copy of Land Certification.</p>	<p>No Category A projects approved for implementation.</p> <p>All Safeguard Reports for Category C are prepared.</p>		annual monitoring reports to be submitted to ADB.
2	No requirement for Resettlement Plan (RP) preparation for Non-Large-Scale Projects	Preparation of RP for subprojects in accordance with PRC regulations, ADB SPS, and the Program's Social Safeguard Technical Guideline	<p>RPs prepared for all subprojects.</p> <p>PMO Issuance of Confirmation Letter that the RP is satisfactory prior to award of civil works contract.</p> <p>PMO Issuance of Confirmation Letter that LA and HD were satisfactorily completed before physical and economic displacement of affected persons and submit to ADB.</p>	PMO with support from resettlement institute and project implementation consultants.	<p>RPs in English language submitted to ADB within 15 days upon confirmation that the RPs are satisfactory to PMO<sup>a</sup></p> <p>PMO Confirmation Letters will be included as attachment in the semi-annual monitoring reports to be submitted to ADB.</p> <p>Semi-annual external monitoring reports to verify PMO reporting.</p>
3	No requirement to conduct due diligence for past land acquisition	Conduct due diligence for subprojects. Preparation of due diligence report	<p>DDRs prepared.</p> <p>PMO Issuance of Confirmation Letter that the DDR is satisfactory and there is no legacy or</p>	PMO with support from resettlement institute and project implementation consultants.	<p>DDRs in English language submitted to ADB within 15 days upon confirmation that the DDRs are satisfactory to PMO<sup>b</sup></p> <p>PMO Confirmation Letters</p>

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			<p>outstanding issue prior to award of civil works contract.</p> <p>If there are outstanding/ legacy issues, PMO to submit the report including corrective actions to ADB for review prior to award of civil works</p>	<p>PMO with support from resettlement institute and project implementation consultants.</p>	<p>will be included as attachment in the semi-annual monitoring reports to be submitted to ADB.</p> <p>Semi-annual external monitoring reports to verify PMO reporting.</p> <p>DDR with corrective actions to be submitted to ADB for review once available.</p>
4	No requirement to conduct compliance audit for existing facilities	Social Compliance Audit (SCA) of existing facilities to be undertaken, if relevant.	<p>SCA prepared.</p> <p>PMO to confirm in writing that the audit is satisfactory before awarding of civil works contract and no legacy issues for past resettlement activities.</p> <p>If there are outstanding/ legacy issues, PMO to submit the social compliance audit report including corrective actions to ADB for review prior to award of civil works.</p>	<p>PMO with support from resettlement institute and project implementation consultants.</p> <p>PMO with support from resettlement institute and project implementation consultants.</p>	<p>SCAs in English language submitted to ADB within 15 days upon confirmation that the SCAs are satisfactory to PMO<sup>c</sup></p> <p>PMO Confirmation Letters will be included as attachment in the semi-annual monitoring reports to be submitted to ADB.</p> <p>SCA report with corrective actions to be submitted to ADB for review once available.</p>
5	Lack of identification of the poor and vulnerable groups during the screening process and	Early screening of vulnerable groups; conduct of proper social/risk analysis.	Results of screening and assessment in the IR categorization checklist, RP, Due Diligence, SCA.	PMO with support from resettlement institute and project implementation consultants.	See items 2–4 above.

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	resettlement planning.				
6	Inadequate documentation of the consultation and information disclosure activities and grievances received	Documentation of consultations, information disclosure and grievances received.  GRM established at the PMO level.	Documentation are reflected in the resettlement plan and monitoring reports.  A well-established and functional GRM is in place at the PMO; and with clear roles and responsibilities when dealing with concerned government agencies handling resettlement.	PMO with support from resettlement institute and project implementation consultants.  External Monitor	See items 2–4 above and 8 below.  See Item 8 below in terms of monitoring grievances and assessment if GRM is effective.
7	No requirement to disclose resettlement planning documents during project preparation and implementation.	Disclosure of resettlement plans, DDR, SCA report	All RPs, DDRs, SCAs disclosed on PMO website <sup>d</sup>  Key information of RPs, DDRs and SMRs provided to affected people and other stakeholders in a form and language understandable to them.	PMO  PMO	Disclosure activities will be reported in the semi-annual monitoring reports.  Disclosure activities will be reported in the semi-annual monitoring reports.
8	Inadequate monitoring and evaluation	PMO to establish a safeguard monitoring system to allow proper coordination and facilitation with concerned agencies.  Preparation of semi-annual monitoring reports  PMO to engage an external monitor to carry out its own	Safeguard monitoring tracking system established.  Semi-annual monitoring reports prepared and submitted to ADB and uploaded on PMO website  An external resettlement monitor, acceptable to both	PMO  PMO  PMO	Monitoring requirements incorporated into the PID before program approval.  Every July (for Jan–Jun monitoring period) and Every January (for July–Dec monitoring period).  Engagement of external monitor and timing of



- <sup>d</sup> Satisfactory RP, DDR, SCA disclosed by ADB on ADB website upon receipt.
- <sup>e</sup> PMO to seek ADB's guidance by sharing TOR and qualification of potential external monitor selected by the PMO prior to contract signing.
- <sup>f</sup> Satisfactory monitoring reports will be uploaded by ADB on the ADB website upon receipt.
- <sup>g</sup> Satisfactory completion report will be uploaded by ADB on the ADB website upon receipt.