

Environmental Management Plan

October 2021

Cambodia: Fourth Greater Mekong Subregion Corridor Towns Development Project

Wastewater Treatment Plant and Drainage System Subproject,
Stung Treng City, Stung Treng Province

Prepared by the Ministry of Public Works and Transport for the Asian Development Bank

ABBREVIATIONS

ADB	-	Asian Development Bank
AP	-	Affected People
BOD	-	Biochemical Oxygen Demand
CEMP	-	Construction Environmental Management Plan
C-EHS	-	Contractor's Environment, Health and Safety Officer
CMAC	-	Cambodia Maine Action Center
COD	-	Chemical Oxygen Demand
CRVA	-	Climate Risk Vulnerability Assessment
DDPP	-	Detailed Design and Project Preparation
EA	-	Executing Agency
EIA	-	Environmental Impact Assessment
EMP	-	Environmental Management Plan
FGD	-	Focus Group Discussion
GDR	-	General Department of Resettlement
GMS/CTDP-4	-	Fourth Greater Mekong Subregion Corridor Towns Development Project
GRM	-	Grievance Redress Mechanism
IEE	-	Initial Environmental Examination
IESIA	-	Initial Environmental and Social Impact Assessment
MAFF	-	Ministry of Agriculture, Forest, and Fishery
MoE	-	Ministry of Environment
MOWRAM	-	Ministry of Water Resources and Meteorology
MPWT	-	Ministry of Public Works and Transport
PDoE	-	Provincial Department of Environment
PDPWT	-	Provincial Department of Public Works and Transport
PMC-I/NES	-	PMC-International and National Environmental Specialists
PIU	-	Project Implementation Unit
PIU-SFP	-	PIU Safeguards Focal Point
PMC	-	Project Management Consultant
PMU	-	Project Management Unit
PMU-ESO	-	PMU Environmental Safeguards Officer
PSC	-	Project Steering Committee
RCP	-	Representative Concentration Pathway
SHC	-	Sewer Household Connection
SPS-1	-	Sewage Pumping Station 1
SPS-2	-	Sewage Pumping Station 2
TS-2 Project	-	Second Urban Environmental Management in the Tonle Sap Basin Project
TSS	-	Total Suspended Solid
UXO	-	Unexploded Ordnance
WHO	-	World Health Organization
WWTP	-	Wastewater Treatment Plant

CURRENCY EQUIVALENTS

(as of June 2020)

Currency unit	–	riel (KR)
KR 1.00	=	\$ 0.00025
\$1.00	=	KR 4,000

WEIGHTS AND MEASURES

dB(A)	-	A-weighted Decibel
ha	-	Hectare
km	-	Kilometre
km ²	-	Square kilometre
L _{Aeq}	-	Equivalent Continuous Level 'A weighting' - 'A'-weighting = correction by factors that weight sound to correlate with the sensitivity of the human ear to sounds at different frequencies
m	-	Metre
°C	-	Degree Celsius
PM ₁₀	-	Particulate Matter 10 micrometres or less
PM _{2.5}	-	Particulate Matter 2.5 micrometres or less
µg/m ³	-	Microgram per cubic meter

NOTE

In this report, "\$" refers to United States dollars.

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1 INTRODUCTION

1.1 Purpose

1. This document is the environmental management plan (EMP) for the Stung Treng Wastewater Treatment and Drainage Subproject. The EMP covers the construction and operation of a Wastewater Treatment Plant, and construction and operation of separate wastewater and stormwater networks in Stung Treng City.
2. The Stung Treng Wastewater Treatment and Drainage Subproject is a subproject under the Fourth Greater Mekong Subregion Corridor Towns Development Project (GMS/CTDP-4 or the Project), which supports the Governments of Cambodia and the Lao People's Democratic Republic (PDR) in enhancing the competitiveness of selected towns located along the Central Mekong Economic Corridor in the Greater Mekong Subregion (GMS).
3. The objectives of the subproject are to (i) accelerate the development of Cambodia's second socioeconomic growth centre; and (ii) promote regional socioeconomic integration of provinces and towns along the GMS corridors (iii) support the scaling up for climate adaptation, public management reforms including use of ICT, expand regional connectivity and extend value-chains, and competitive, inclusive, and environmentally sustainable urban development.
4. The EMP defines the mitigation and monitoring measures and describes the institutions, responsibilities and mechanisms to monitor and ensure compliance. Such institutions and mechanisms will seek to ensure continuous improvement of environmental protection activities during pre-construction, construction, and operation of the subproject in order to prevent, reduce, or mitigate adverse impacts.
5. The environmental classification of the Subproject is confirmed as Category B. The EMP has been carried out in accordance with the Safeguard Policy Statement (2009) of the Asian Development Bank (ADB), and Cambodia's Law on Environmental Protection and Natural Resource Management (Preah Reach Kram/NS-PKM-1296/36) 1996, and its sub-decrees and implementing guidelines. The EMP is based on the separate Initial Environmental Examination (IEE) of October 2021 and both the IEE and EMP have been updated in conjunction with the finalization of the Detailed Engineering Design (DED) ensuring consistency between engineering designs and environmental mitigation measures. The EMP also incorporates the findings of the Initial Environmental and Social Impact Assessment (IESIA) approved by the Ministry of Environment (MoE) on 20 May 2021. The EMP will be further updated if necessary. The previous EMP which was part of an IEE/EMP (May 2018) covering all subprojects under the GMS/CTDP-4 Project is available on ADB's website¹.

1.2 Objective of the EMP

6. The EMP describes how the mitigation and other measures to enhance the benefits of environmental protection to be implemented. It explains how the measures will be managed, who (agency) will implement them, when and where they will be implemented. The following elements will be described in the EMP: (i) implementation of mitigation measures during project design; (ii) implementation of mitigation measures during construction by contractors, and how impacts prevention will be incorporated in the materials procurement; (iii) social development program (e.g., resettlement plan, community training); (iv) contingency response plan for natural or other disasters, and

¹ <https://www.adb.org/projects/documents/cam-50099-002-iee>

project contingencies; and (v) environmental management and monitoring costs including mitigation costs.

2 Project Description and Technical Approach

2.1 Salient Project Data

7. The subproject has a design period of 20 years to Year 2040. The main subproject components are listed below:
 - Construction of 47.841 km primary and secondary sewers and 5.528 km tertiary sewers;
 - Construction of service connections for 2,373 households, commercial and institutional buildings including onsite plumbing;
 - Construction of three (3) wastewater pumping stations and 3.077 km of associated pumping mains;
 - Upgradation of one (1) existing storm drainage pumping station with additional one pump in existing pump station building, associated pumping main, and other additional allied units and structures;
 - Construction of a 2,900 m³/day Wastewater Treatment Plant (WWTP) above flood levels:
 - Total area 9.75 ha
 - Treatment ponds 4.31 ha
 - Operations area 0.161 ha
 - Internal access road 0.21 ha
 - Laterite wearing course on the 4.5 m wide access road the first 85 meter from the WWTP to the east
 - Construction of administration, workshop, electrical and guard buildings at the WWTP site;
 - Construction of 1.800 km storm drainage diversion (φ800–φ1000) for storm water management including outlet structure;
 - Provision of operations & maintenance equipment.

2.2 WWTP Location and Service Area

8. The proposed WWTP site is located in Krang Memay Village, Preah Bat Commune, Stueng Treng District. The site covers an area of 9.75 ha.
9. The location of the wastewater treatment plant and its service area are indicated on the map in **Figure 1**. The project is designed to cover three communes (sangcats) constituting the main urban area of Stung Treng namely Preah Bat, Srah Ruessei and Stung Treng. The service area is approximately 450 ha and has a population of about 19,700 (2020).

Figure 1 Stung Treng Wastewater and Drainage Service Area



2.3 Technical Approach

10. The layout of the Wastewater Treatment Plant is displayed in **Figure 2**. Waste Stabilization Ponds has been chosen as the most appropriate technology. This technology consists of a series of different types of waste stabilization ponds (anaerobic, facultative, maturation) that rely entirely on natural processes by algae and bacteria with sunlight as the only energy source. This is a well-established, low-cost, low-maintenance, highly efficient, entirely natural and sustainable technology for domestic wastewater treatment in tropical climates.
11. The Wastewater Treatment Plant for Stung Treng City comprises a dual series of 2 x anaerobic, 2 x facultative and 2 x maturation ponds. The WWTP is designed to produce a high-quality effluent that will consistently remove BOD, COD, TSS and Total Coliform. Although the design (as is common practice) is based on BOD and faecal coliform removal – for which waste stabilization ponds are very effective - and not on removal of nutrients from the wastewater, the processes do also contribute to nutrient removal.
12. The main WWTP process components and units include:
 - Inlet Screening Structure with channels for manually cleaned main screen and bypass screen;
 - Septage Receiving Structure with manually cleaned screen;
 - Two (2) Anaerobic Ponds in parallel with actual pond ground level dimensions including freeboard of 30.90 m (width) and 59.40 m (length), each pond. Total effective process volume 1450 m³/pond;
 - Two (2) Facultative Ponds in parallel with actual dimensions including freeboard of 48.20 m (width) and 81.20 m (length), each pond. Total effective process volume 6317 m³/pond;
 - Two (2) Maturation Ponds in parallel with actual dimensions including freeboard of 47.50 m (width) and 104.40 m (length), each pond. Total effective process volume 5339 m³/pond;
 - One (1) Sludge Pond - actual dimensions including freeboard of 26.0 m (width) and 54.06 m (length). Total effective process volume 1939 m³.

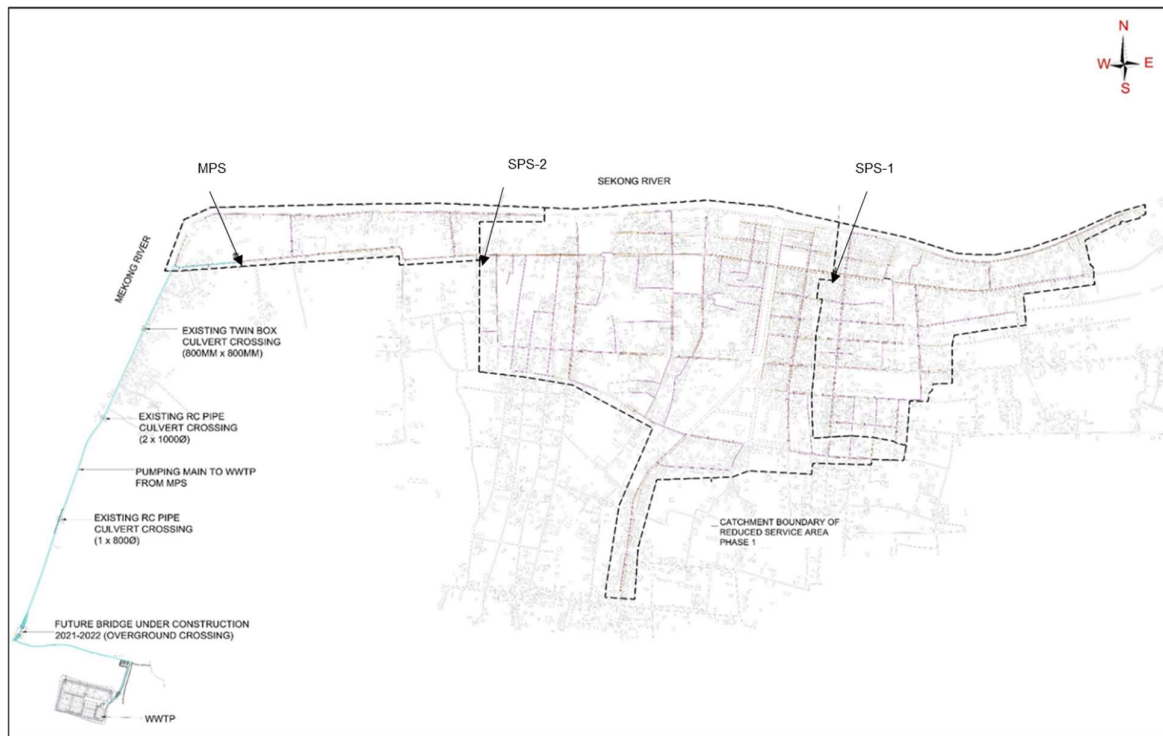
The site plan illustrates the layout of the wastewater treatment facility. Key components include:

- Perimeter Fence:** A dashed line indicating the boundary of the site.
- Existing Stream:** A solid line representing the natural water body.
- Mekong River:** A large body of water on the left side of the plan.
- Outlet Pipe and Structure:** A point where treated effluent is discharged.
- Workshop and Administration:** Buildings located near the outlet structure.
- Maturation Ponds:** Two large rectangular ponds for final treatment.
- Facultative Ponds:** Two rectangular ponds for intermediate treatment.
- Anaerobic Ponds:** Two rectangular ponds for initial treatment.
- Sludge Pond:** A circular pond for sludge storage.
- Septage Receiving Chamber and Truck Washing Bay:** Facilities for sludge handling and vehicle cleaning.
- Coordinate Tables:** Two tables on the right providing UTM coordinates for various points on the site.
- Legend:** A key for symbols used in the plan, including GUT, SLP, FWS, and various types of roads and channels.
- Notes:** A note at the bottom right stating "NOTES: ALL DIMENSIONS AND LEVELS ARE IN METERS".

POINT	X-COORDINATE	Y-COORDINATE
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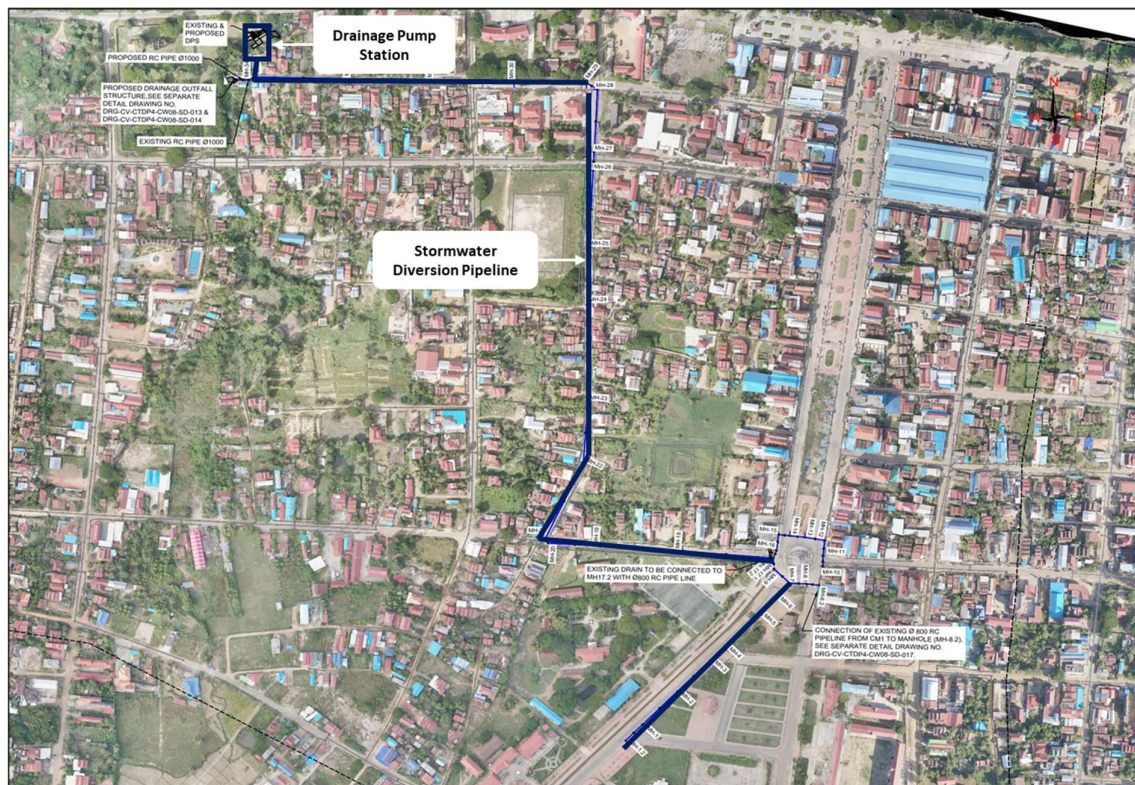
- 10

Figure 3: Outline of the Wastewater Network



14. The new stormwater drainage is displayed in **Figure 4**. The network will overlap with the sewage service area. The primary objective of the drainage system is to mitigate flooding and resolve other drainage problems in the urban centre.

Figure 4: Outline of the drainage network



3 SUMMARY OF POTENTIAL RECEPTORS & IMPACTS

15. The key receptors and their proximity to the subproject components are presented in **Table 1** and the receptors in the area surrounding the WWTP site are displayed in **Figure 5** and **Figure 6**

Table 1: Summary of Environmental Sensitive Receptors for WWTP Subproject

Project Component	Surface Water Receptors	Socio-Economic & Cultural Receptors	Land Cover/ Ecological Receptors	Protected Area Status
Wastewater Treatment Plant	<ul style="list-style-type: none"> - the Mekong River via a 350 m long stream 	<ul style="list-style-type: none"> - 100 m – 150 m to the nearest single houses - 250 m to housing along the road on the left bank of the Mekong River - About 4 km from National Road No. 9 - About 2 km from densely populated areas - Five private landowners. Land acquisition by willing seller - willing buyer arrangement 	<ul style="list-style-type: none"> - The site is covered with grassland, shrub and cashew trees. - The surrounding area in a 500 m radius is dominated by shrubland with patches of agricultural land 	<ul style="list-style-type: none"> - The site is located inside the Mekong River from Kratie to the Lao PDR, Key Biodiversity Area. - 300 m east of the Northeast Biodiversity Corridor of Protected Area - 7.6 km south-southwest of the Stung Treng Protected Area (Ramsar Site)
Wastewater and Drainage network	<ul style="list-style-type: none"> - The stormwater drainage network discharges to the Mekong River and the Sekong River 	<ul style="list-style-type: none"> - Network in dense urban area, where there are houses, pagodas, market, business shop, schools. - Presence of local utilities services: electric line/pole, water supply, cable line, and other social service structures 	<ul style="list-style-type: none"> - Paved and unpaved urban roads - Some street trees and limited urban vegetation 	<ul style="list-style-type: none"> - Stung Treng District is partly inside Sekong River KBA and Mekong River from Kratie to the Lao PDR, KBA.
Wastewater and drainage pump stations (MPS, SPS-1 and SPS-2, DPS-1)	<ul style="list-style-type: none"> - The drainage pump station discharges to the Sekong River 	<ul style="list-style-type: none"> - MPS: 60 m to school, 60 m to pagoda and 25 m to the nearest houses - SPS-1: next to kindergarten - SPS-2: 45 m to houses 	<ul style="list-style-type: none"> - As above 	<ul style="list-style-type: none"> - As above

Figure 5 Key Receptors in the Immediate Vicinity of the Wastewater Treatment Plant

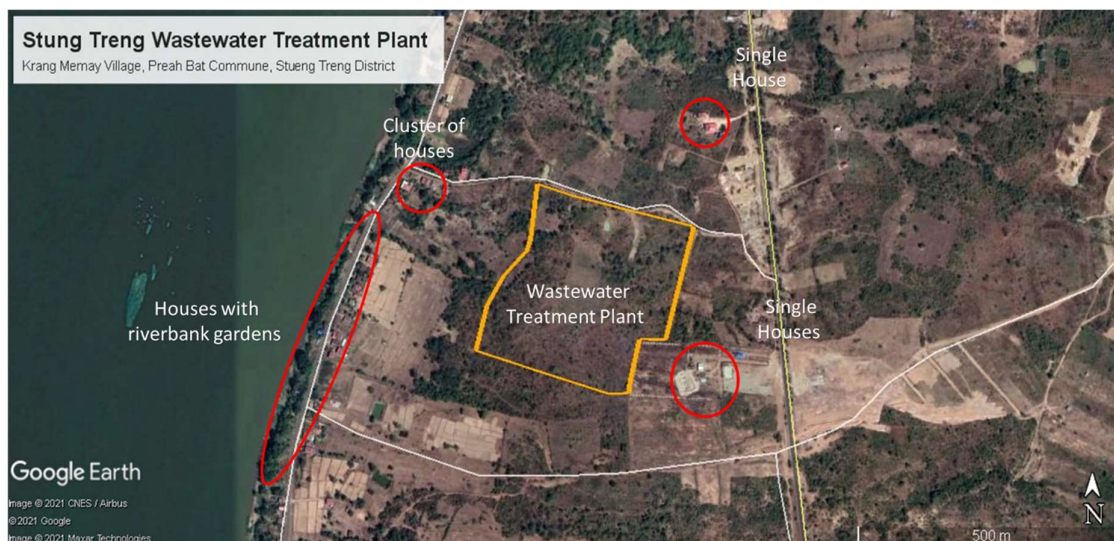
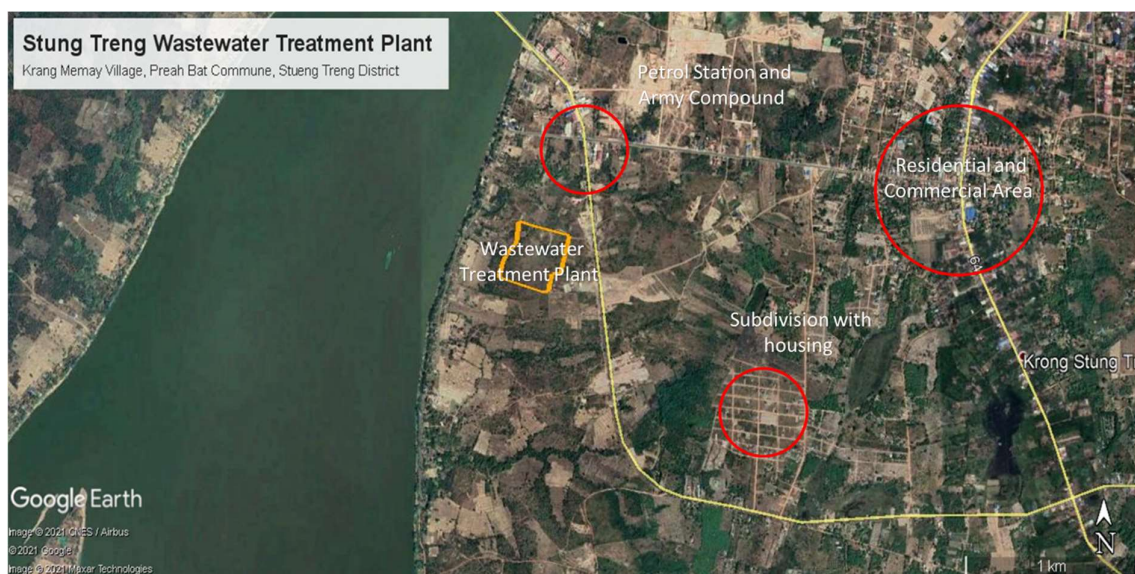


Figure 6 Key Receptors in the Immediate Vicinity of the Wastewater Treatment Plant



16. **Table 2** summarizes the potential impacts associate with the Stung Treng Wastewater and Drainage Subproject during construction and operation.

Table 2: Summary of Impacts from the Stung Treng Wastewater and Drainage Subproject

Impact	Source	Receptors
Construction		
Degradation of Air Quality	<ul style="list-style-type: none"> - Exhaust fumes from construction machinery and equipment, movement of haulage trucks - Fugitive dust from earth works, loading, unloading and haulage of construction materials 	<ul style="list-style-type: none"> - Nearby residents - Workers
Noise and vibration nuisance	<ul style="list-style-type: none"> - Noise from construction equipment - Earthworks 	<ul style="list-style-type: none"> - Nearby residents - Workers

Impact	Source	Receptors
Impacts on water quality	<ul style="list-style-type: none"> - Discharge of contaminated runoff (suspended material, oil spills) - Accidental spills - Waste littering 	<ul style="list-style-type: none"> - Local streams - Groundwater
Erosion or degradation of soil and land	<ul style="list-style-type: none"> - Earthworks - Accidental spills/ poor management of waste 	<ul style="list-style-type: none"> - WWTP site and its immediate surroundings
Flora and fauna	<ul style="list-style-type: none"> - Removal of street trees for construction of pipelines 	<ul style="list-style-type: none"> - Local communities
Risk of infections	<ul style="list-style-type: none"> - Influx of labour force for the construction work 	<ul style="list-style-type: none"> - Communities - Workers
Reduced accessibility	<ul style="list-style-type: none"> - Excavation works / trenches in public areas - Presence of equipment in public areas 	<ul style="list-style-type: none"> - Communities
Operation		
Impacts on water quality	<ul style="list-style-type: none"> - Non-compliant effluents 	<ul style="list-style-type: none"> - Fauna and flora in recipient stream
Odours	<ul style="list-style-type: none"> - WWTP operations - Treatment of sludge 	<ul style="list-style-type: none"> - WWTP operators - Nearby residents
Health and safety risks	<ul style="list-style-type: none"> - Use of equipment/maintenance of WWTP and networks - Presence of litter and pests in networks - Non-compliant effluents 	<ul style="list-style-type: none"> - Workers - Nearby residents - Communities

4 INSTITUTIONAL ARRANGEMENTS & RESPONSIBILITIES

17. The framework for implementation of the environmental management plan (EMP) for the project is described in this section. The key institutions, organizations and stakeholders relevant to environmental safeguards are set out below.
18. The overall responsibility for EMP implementation and compliance with loan assurances lies with the Executing Agency (EA), the Ministry of Public Works and Transport. The EA will establish a Project Management Unit (PMU) based in Phnom Penh, responsible for general project implementation. The Implementing Agency is the Provincial Department of Public Works and Transport (PDPWT) in each subproject city. The PDPWT has established a Project Implementation Unit (PIU) in each province, comprising relevant provincial government representatives including the Provincial Department of the Environment.
19. A summary of the key functions for project implementation and environmental safeguards is presented in **Table 3²**.

Table 3: Key Roles for Project Implementation

Role	Abbreviation	Location	Summary of Overall Function
Ministry of Public Works and Transport	MPWT	Phnom Penh	Accountable towards the Royal Government of Cambodia and ADB for the implementation of the Subproject and for

² For further information see the Project Administration Manual, Kingdom of Cambodia: Fourth Greater Mekong Subregion Corridor Towns Development Project, Project Number: 50099-003, July 2018

Role	Abbreviation	Location	Summary of Overall Function
			ensuring compliance with loan covenants
Project Steering Committee	PSC	Phnom Penh	Policy and technical guidance for subproject implementation
Project Management Unit	PMU	Phnom Penh within MPWT	Responsible for general project implementation and reporting
PMU Environment Safeguards Officer (funded through CTDPA Loan)	PMU-ESO	Phnom Penh within PMU	EMP compliance across the sub-projects for environmental safeguards - Full Time
Provincial Department of Public Works and Transport	PDPWT	Stung Treng Province	Subproject implementing agency. Approve budgets for the PIU and ensure coordination with provincial departments
Project Implementation Unit	PIU	Provinces within PDPWT	Responsible for sub-project implementation
PIU Safeguards Focal Point	PIU-SFP	Provinces within PIU	Responsible for sub-project environmental and social safeguard monitoring - Full Time
Contractor's Environment, Health and Safety Officer	C-EHS	Construction Site	Ensuring compliance with applicable Cambodian environmental, health and safety legislation and with relevant IFC Environmental, Health and Safety guidelines
Project Management Consultants	PMC	Phnom Penh	Project final design and implementation, support and capacity development. Engineering supervision for all construction and reporting
International and National Environment Specialists	PMC-I/NES	Phnom Penh within PMC team	Environmental safeguards and reporting support during design and implementation - Intermittent
Asian Development Bank	ADB	-	Review project progress, compliance with covenants and advise on corrective actions
Ministry of Environment (MOE)/ Provincial Department of Environment (PDoE)	MoE/PDoE	Phnom Penh province	Collaborate with project to provide policies or environmental standards and advise. Observer and conduct environmental monitoring of the project activities based on the mandate.

20. A Project Steering Committee (PSC) has been established to provide policy and technical guidance for subproject implementation. The PSC is chaired by the EA and comprises relevant ministry of provincial departments representatives including the Ministry of Environment, General Department of Resettlement (GDR) and Ministry of Labour as a minimum.
21. External support to the Implementing Agency/PIU for EMP implementation during the project detailed design and implementation phase will be provided by the International and National Environment Specialists (I/NES) of the Project Management Consultants (PMC). Field sampling and laboratory analyses of environmental quality (e.g., water quality, air quality, noise) will be carried out by duly qualified technicians such as qualified staff of the Ministry of Environment (MoE).

22. ADB is responsible for reviewing project progress reports and semi-annual environmental safeguards monitoring reports and undertaking review missions to ensure the project is implemented in line with the relevant environmental safeguard requirements, Safeguards Policy Statement (2009) and Royal Government of Cambodia regulations and guidelines.
23. The Executing Agency is accountable for project implementation and operation on behalf of the Royal Government of Cambodia. The responsibilities of the Executing Agency in relation to environmental safeguards requirements are summarized below:
- a) Overall responsibility for subproject implementation and management of the Project Management Unit (PMU);
 - b) Recruit and manage qualified ESO for PMU;
 - c) Recruit and manage Project Management Consultants
 - d) Ensure compliance with Loan Covenants;
 - e) Approve procurement plans, bidding documents, bid evaluation and contract awards including EMP;
 - f) Submit regular quarterly and annual subproject reports to ADB including summary on EMP and GRM implementation;
 - g) Ensure compliance of subproject/component implementation with ADB and Government social and environmental policies, guidelines and plans;
 - h) Approve proposed corrective actions in the event of identified impacts or non-compliance issues identified in monitoring and evaluation reports.
24. The responsibilities of the Implementing Agency in relation to environmental safeguards requirements are summarized below:
- a) Coordinate and monitor subproject implementation activities including all environmental safeguards activities;
 - b) Coordinate capacity development program for PIU;
 - c) Obtain necessary approvals from respective departments and other institutions prior to awarding of civil works contracts;
 - d) Support PMU-ESO in the implementation of EMP;
 - e) Coordinate regular reporting of PMU to EA on EMP implementation;
 - f) Undertake regular quality control inspection of subproject facilities;
 - g) Manage the handover of subproject facilities to agencies responsible for operation and maintenance; and
 - h) Ensure PIU engage with and follow the Grievance Redress Mechanism GRM.
25. Specific environmental safeguard responsibilities are set out for each project phase as shown in **Table 4**.

Table 4: EMP Responsibilities

Responsible Entity	Engineering Detailed Design	Tendering & Pre-construction	Construction	Operation
Ministry of Public Works and Transport, Executing Agency	Accountable towards the Royal Government of Cambodia and ADB for the implementation of the Subproject and for ensuring compliance with loan covenants			
PMU / PMU-ESO	Update IEE/EMP	Engage PMC & PMU-ESO	Ensure EMP is implemented, and that the contractor(s) abide by the EMP	
	Review updated EMP	Coordinating the tendering process including overseeing incorporation of EMP clauses into the bidding documents	Supervising project construction (with support of PMC engineers)	
	Confirm that mitigation measures have been included in engineering detail design	Ensuring the procurement of environmentally responsible contractors and approve CEMP	Prepare and submit quarterly and annual reports including environmental safeguard reporting to ADB	
		Ensuring that domestic IESIA approvals by MoE have been secured prior to the awarding civil works contracts		
		Dissemination and coordination of Grievance Redress Mechanism	Ensure EMP implementation and submit regular monitoring reports to Implementing Agency and EA	
			ensure PIU-SFPs undertake regular site inspections as part of progress reporting	
PIU-SFP		Attend all pre-construction training courses regarding EMP implementation Establish GRM	Working closely with the contractors to ensure EMP implementation	
			Support GRM	
			Support Progress Monitoring and Reporting requirements working with PMU-ESO	
			Conduct consultation interviews with	

Responsible Entity	Engineering Detailed Design	Tendering & Pre-construction	Construction	Operation
			affected people	
Project Management Consultants PMC	Engage appropriate engineer and safeguards staff	See PMC-I/NES	See PMC-I/NES	Operator training and support as per ToR in PAM
	Finalise Detailed Engineering Design in accordance with Environmental Safeguard principles			
Project Management Consultants PMC (PMC-I/NES)]	Update IEE/EMP if needed	Provide training on EMP supervision and GRM to PMU, PIU and contractors	Coordinate public consultation with PMU/ ESO/ PIU-SFP	Organize, prior to project completion report (PCR) mission, a survey to assess community satisfaction with project implementation and EMP implementation performance. Draft environment sections of the PCR.
		Set-up environmental management and internal monitoring systems at PUSO and civil works contracts level	Prepare semi-annual EMP progress reports	
		Review tender and contractor documents	Identify environment-related implementation issues and necessary corrective actions	
		Review the Construction Environmental Management Plan	Training of PMU, PIU and other stakeholders GRM and EMP implementation	
		Ensure grievance redress mechanism established		
		Regular EMP and implementation monitoring		
		Assess the subproject's readiness in terms of environmental management (see <i>Table 10</i>)		
		Coordinate public consultations		
			Organize, prior to project completion report (PCR) mission, a survey to assess community satisfaction with project implementation and EMP implementation performance. Draft environment sections of the PCR.	

Responsible Entity	Engineering Detailed Design	Tendering & Pre-construction	Construction	Operation
Contractor		Prepare Construction Environmental Management Plan and provide environmental track record in bid response Obtain approval of the CEMP from PMU before starting any works at site	Ensure sufficient funding and human resources for proper and timely implementation of required mitigation and monitoring measures in the EMP throughout the construction phase	Ensure handover of sites is in accordance with EMP and any corrective actions identified in Project Completion Report are completed.
			Appoint an Environment, Health and Safety (EHS) officer to oversee EMP implementation related to environment, occupational health and safety on construction site	
			Ensure health and safety	
			Implement mitigation measures	
			Act as a local entry point for the project GRM and collaborate with PMU on all GRM issues	
External Monitoring Institute		Undertake specialised environmental monitoring as contracted by PMU	Undertake specialised environmental monitoring as contracted by PMU	Undertake specialised environmental monitoring as contracted by Operator
Operator			Testing prior to commissioning to ensure discharge standards can be met	Ensure proper operation of project facilities according to design standards & monitoring
				Allocation of budget for O&M

4.1 Institutional Capacity Review and Needs

26. Currently there is little experience of monitoring and implementing environmental mitigation measures particularly at provincial level. There is little enforcement of environmental or health and safety legislation and routine environmental monitoring is not undertaken apart from in major urban centres (air quality) or major rivers (water quality).
27. During the preparation of the EMP, the team checked the capacity and experience at MPWT and found that there are a number of people who have fulfilled the role of 'focal point' for safeguards on a project-by-project basis, and there is an established Safeguards team within the ministry of six people. This team has experience of working on highway projects but have not to date been involved in urban development projects and are willing to be involved in any training and site visits required during project implementation. They will be provided with copies of relevant monitoring reports, the EMP and other relevant safeguard documents.
28. In addition, through understanding existing operations for the wastewater treatment in Phnom Penh, it is clear that there is still limited ability for operation and maintenance. The limiting factors affecting the operators' ability to maintain adequate standards are likely to be a function of (i) a lack of technical capacity and experience; and (ii) insufficient budget.
29. A training program is set out in **Table 5, Error! Reference source not found.** which addresses the safeguard reporting and implementation requirements during construction, and the environmental and social risks from operations.
30. The engagement of a National Environmental Specialist for 10 months spread throughout implementation will be critical to ensuring the capacity of the PIU staff and to ensuring monitoring and reporting are managed effectively during implementation. This person will also work closely with the PMU Environment Safeguards Officer (PMU-ESO) in order to ensure safeguards are implemented and monitored.
31. **Training for EMP implementation.** The proposed training required for project implementation is set out in **Table 5.** For budgeting purposes, refer to Feasibility Report Volume 5, Institutional Strengthening and Capacity Building. Specifically, the training requirements for the project set out in the relevant Terms of Reference include to train PIUs, contractors, municipalities, and other relevant stakeholders on the implementation of the EMP.
32. To ensure that the subproject will be duly and properly operated and maintained, operation and maintenance equipment is included in the construction contract and the contractor is required to prepare an operation and maintenance manual and conduct training of the operator. In addition, at the end of the commissioning period, there shall be a six (6) months operations and maintenance period where the contractor shall provide an operations and maintenance manager and relevant operations and maintenance staff to operate the WWTP and the wastewater and drainage networks. During this period, the contractor shall provide on-the-job training for operator's employees. The on-the-job training shall include:
 - Training on achievement and compliance with regulatory standards and monitoring of the performance of the facilities;
 - Training on operation and maintenance, of the wastewater system, odour control, discharging of effluent, sludge disposal and other environmental controls related to the WWTP;
 - Troubleshooting typical issues with wastewater treatment performance;
 - Occupational health and safety;
 - Emergency preparedness and response procedures.

Table 5: Capacity Building and Training Requirements

Subject / Content	Participants	Trainer/ Organization	When/ Frequency	Duration (days / event)	Participants	Cost (\$) USD
EMP adjustment and implementation - Development and adjustment of the EMP, roles and responsibilities, monitoring, supervision and reporting	PMU, PIU, contractors	I/NES of Project Management Consultant	Twice - Once prior to, and once after 6 months of construction	2	10	in project construction cost
Grievance Redress Mechanism (GRM)-roles and responsibilities	PMU, PIU, contractors, Commune Councils	I/NES of Project Management Consultant	Twice - Once prior to, and once after 6 months of construction	1	10	
Environmental protection Pollution control on construction sites (air, noise, wastewater, solid waste)	PMU, PIU, contractors	I/NES of Project Management Consultant	Once (during project implementation)	2	10	
Environmental monitoring - Monitoring methods, data collection and processing, reporting systems	PMU, PIU, contractors, Operators of the WWTP and wastewater and drainage network	I/NES of Project Management Consultant & MoE (environmental analyst)	Once (at beginning of project construction)	2	10	
WWTP Management	Included as part of the subproject investment management training budget					

5 IMPACT MITIGATION MEASURES PLAN

5.1 Overview of Mitigation Measures

33. The Impact Mitigation Plans for the Subproject are presented in **Table 7**: Pre-Construction Phase Mitigation Measures, **Table 8**: Construction Phase Mitigation Measures, and **Table 9**: Operational Phase Mitigation Measures.

5.2 Construction Environmental Management Plan

34. The contractor is required to prepare the Construction Environmental Management Plan (CEMP) for review and approval by the PMU and PMC. The CEMP shall be prepared in accordance with the IEE and EMP for the Subproject as cleared by ADB and in accordance with any other requirements stipulated in the bidding documents.

35. PMC has developed a CEMP template to guide the preparation of the CEMP.

5.2.1 CEMP Subplans

36. The CEMP for this Subproject shall include the following subplans:

- Air emissions management and monitoring
- Noise management and monitoring
- Hazardous materials management
- Erosion and sediment control
- Surface water and groundwater monitoring
- Community and Occupational Health and Safety
- Emergency Preparedness and Response
- Traffic Management
- Labour Camp Management
- COVID-19 health and safety subplan in accordance with national COVID-19 instructions and regulations.

5.2.2 Borrow Pit and Spoil Disposal Site Selection

37. The contractor shall include the site selection criteria stipulated in **Table 6** when proposing sites for borrow pits and spoil disposal.

Table 6: Site Selection Criteria for Borrow Pits and Spoil Disposal Sites

Site Selection Criteria	Proposed Site Conditions
Preferably on degraded or lower value land such as grasslands, land devoid of forest or with highly degraded forest cover, or land with poor soil quality	
Not in ecological sensitive area (e.g. Protected Area or Key Biodiversity Area or on land that hosts Threatened (IUCN Red List) plant or animal species	
Not in wetlands, waterways or in riparian zones	
Not in agricultural productive land	
Not in land with spiritual, cultural, historical or archaeological value	
On lower slope land, so that stable landforms can be created. If possible, land with a slope more than 10% shall generally not be used for spoil disposal, where possible	
Not on unstable slopes, where the added weight could trigger mass movement	
Not where groundwater emerges or a thick organic layer is present	
Above the 0.05 (5%) Annual Exceedance Probability flood line	
Backfilling of excavation voids (for spoil disposal)	

Table 7: Pre-Construction Phase Mitigation Measures

Sub-Project Activity	Environmental Risk or Impact	Pre-Construction Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
National IESIA Approval	All	1. The IESIA has been prepared and it was approved by the MoE on 20 May 2021	PMU-PMC Local Firm	MoE	Included in project cost
Design	Surface water pollution	2. The final detailed engineering design of the WWTP ensures that the applicable effluent standards will be complied with	PMC-NIES	PMU	Part of Contract Cost
Disclosure and engagement of community through consultation	Any community related risks or impacts	3. Inform and consult with local communities about the final design, mitigation measures and the Grievance Redress Mechanism	PMU-ESO/ PIU-SFP	EA	Included in PMC cost package
Unexploded Ordnance (UXO) survey, & removal	Risk of injuries or fatalities among workers or members of the public	4. Ensure national military is consulted to confirm that all relevant areas are clear from UXO. This includes: a) All land designated for resettlement purposes (residential/businesses/ farmland) b) All construction sites including 50 m either side of any access roads c) All associated areas including borrow sites. 5. Cambodian Mine Action Centre to clear areas where necessary and provide evidence of clearance to PMU in advance of construction. 6. As evidence, submit a certificate of UXO clearance and attach it as annex to the subsequent monitoring report to ADB once the certificate of clearance has been awarded.	Cambodian Mine Action Centre PIU	PMU/PMC	To be confirmed as required
Tree survey for protection or cutting	Loss of trees	7. Survey for trees higher than 3 m within the construction area for protection or removal. Ensure DWPT and the local authorities have been informed and obtain a permit for tree removal. Tree replantation shall be sought upon completion of the work	Contractor	PMU/PMC	Included in consultancy contract price
Final Design	Flooding/ Climate Change	8. The design incorporates safety margins to accommodate a 50-year return period adjusted for Climate Change with an expected increase in annual precipitation of 5%. As an extra precaution, an additional 0.6 m height above the projected design flood levels has been applied in the design of the structures 9.	PMC	EA	Included in consultancy contract price
Final Design	Emergency	10. The CEMP shall include an Emergency Response Plan 11. The operation and maintenance plan to be prepared prior to start operations shall include an emergency response plan	PMC	EA	Included in consultancy contract price
IEE and EMP Updated	All	12. The IEE and EMP have been updated reflecting the final detailed engineering design and incorporate appropriate mitigation measures.	I/NES	PMU	Included in project cost

Sub-Project Activity	Environmental Risk or Impact	Pre-Construction Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
Construction Environmental Management Plan (CEMP)	All construction related risks and impacts	13. The contractor shall prepare the CEMP for review and approval by PMC and PMU	Contractor	PMC, PMU / EA	Included in project cost
GRM	Any risk or impact as perceived by affected persons	14. Erect sign boards with project details and GRM procedures/contact details at the entrance to each construction site/camp or at strategic locations. 15. PMU to provide contractor with GRM contact details which the contractor will use to print 'GRM Contact Cards' for its staff to hand to complainants and will keep cards with all vehicles, machinery and site managers/foremen. 16. Contractor to raise awareness of all workers on how to respond when an affected person or member of the public has a complaint i.e. direct the person to the most senior site manager present at the time and provide a 'GRM Contact Card'.	Contractor	PMU/ PIU/ PMC	Included in bid price

Table 8: Construction Phase Mitigation Measures

Sub-Project Activity	Environmental Risk or Impact	Construction Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
Civil works	Air quality	1. Batching facilities will be located at least 500 m from the nearest dwellings in order to reduce the impact of fumes on humans and to be fitted with necessary emission control equipment such as bag house filters to reduce fugitive dust emissions. 2. Water will be sprayed at construction sites, material handling areas, unpaved transport routes and borrow pits where fugitive dust may be generated. 3. Trucks carrying dry and loose construction materials such as earth will be covered with tarpaulins or other suitable cover. 4. Construction vehicles and machinery will be maintained to a high standard to minimize emissions. 5. Vehicle speed will be limited to max 30 km/hour in City and village areas 6. All open burning of construction and demolition waste material and refuse will be prohibited. 7. Areas in which road excavations are required for sewage and drainage pipe works will be notified adequately 1 month in advance of works starting.	Contractor	PMU/PMC	Included in bid price
Civil Works	Noise	8. Maintain all exhaust systems which generate noise in good working order and undertake regular equipment maintenance. 9. Ensure that noise control options such as silencers and mufflers are fitted to exhausts, compressors and fans for construction equipment (such as hydraulic excavator, bulldozer, front loader, backhoe and trucks). 10. Implementation of operating and maintenance practices of equipment and machinery to ensure that they are well-maintained.	Contractor	PMU/PMC	Included in bid price

Sub-Project Activity	Environmental Risk or Impact	Construction Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
		<ul style="list-style-type: none"> 11. Restrict construction working hours using heavy machinery to daytime between 07:30-18:00 on weekdays. 12. Collaborate with local authorities, school administrations, pagoda managers and affected people to define proper working hours to mitigate the impact of noise (including in streets or near sensitive receptors like hospitals, schools, places of worship). 13. Provide advance warning to the nearby communities on timing of noisy activities and seek suggestions from community members to reduce noise annoyance particularly related to noise sensitive activities at receptors such as periods of worship at pagodas. Public notification of construction operations will incorporate noise considerations; information procedure of handling complaints through the Grievance Redress Mechanism will be disseminated. 14. Use of mobile noise barriers in densely populated areas where excavations are taking place, if necessary, fence-off construction zones. 15. Ensure noise monitoring is undertaken near sensitive receptors (hospitals, schools, places of worship) when construction machinery is in operation. 16. The contractor shall provide all construction personnel working in the vicinity of noisy construction activities (defined as those activities generating noise levels greater than 80 dB(A)), or any construction personnel who requests hearing protection, with hearing protection equipment. 17. As part of a traffic management plan, speed limits should be set for trucks and other work machinery when passing through residential areas where vehicle speed will be reduced to max 30 km/hour. Engines should be turned off when not in use. 			
Civil Works	Flora or vegetation	<ul style="list-style-type: none"> 18. In accordance with the permit to cut or remove trees (to be obtained prior to start construction), all trees over 3 m in construction sites or access areas shall be preserved, if they are not required and permitted to be removed. The cutting and removal of trees shall be informed to DPWT and the local authorities. 19. An inventory shall be held of trees to be cut and addition replantation shall be sought upon completion of the work 	Contractor	PMU/PMC	Included in bid price
Civil Works	Water Quality and Access	<ul style="list-style-type: none"> 20. Minimize the area of disturbed surfaces and sequence and schedule work to minimize the duration of time that large erodible surfaces are exposed. 21. Where practicable reuse stormwater for various purposes to reduce the amount of water that would otherwise have to be treated and discharged, and to reduce consumption of water from other sources. 22. Design and construct non-erodible channels or bunds to prevent runoff from eroding batter faces or entering excavations. 23. Ensure that runoff is channelled safely over batter slopes and onto stable areas. 24. Ensure that pump outfalls and outfalls from any temporary treatment do not cause or generate erosion of land, banks or beds. 25. Pumps for dewatering of trenches or pits should be placed on a gravel base in a 	Contractor	PMU/PMC	Included in bid price

Sub-Project Activity	Environmental Risk or Impact	Construction Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
		<p>sump or inside a large diameter perforated pipe or manhole ring.</p> <p>26. Install adequate short-term drainage to collect potentially contaminated runoff or process water and provide settlement ponds with the appropriate design to ensure sufficient time for the particles to settle.</p> <p>27. All chemicals and hydrocarbon products used on construction sites will be stored on an impervious surface, under cover, in adequate tanks or containers and within secondary containment. A bund will be provided around any above ground fuel storage tanks with capacity of 110% of the largest single tank. Storage of chemicals or hydrocarbon products shall be at least 50 m from surface water bodies with no direct drainage to surface water.</p> <p>28. All maintenance and refuelling of vehicles and machinery must take place in designated areas, within retention bunds (mobile retention bunds if necessary).</p> <p>29. Similarly, all wastes, especially hazardous waste shall be collected and stored on an impervious surface, under cover and in adequate tanks or containers and within secondary containment for liquid hazardous waste.</p> <p>30. Stockpiles and materials will be stored at least 50 m from surface waters with drainage directed away from the canals or drainage channels and streams or water sources.</p> <p>31. No washing or repair of machinery within 50 m from surface waters.</p> <p>32. There shall be no disposal of spoil on agriculturally productive land or within 50 m of a water course.</p> <p>33. Measures to rehabilitate borrow sites shall be included in the CEMP and will involve contouring of the slopes within each site and replanting sites with native species.</p> <p>34. Topsoil present on construction sites will be removed and stockpiled in labelled areas for later use in rehabilitation of the construction sites including borrow sites.</p> <p>35. Construction working areas will be clearly demarcated and encroachment onto adjacent areas avoided.</p> <p>36. Portable toilets and small wastewater treatment units will be provided on construction sites and construction camps for the workers and canteens. All sanitary facilities should be located at least 50 m from surface water bodies. All workers must be instructed to use these facilities, which shall be kept clean at all times.</p> <p>37. Pit latrines and septic tanks should be placed at least 2 m above the groundwater table must be located at least 50 m from surface water bodies and water wells and in areas of suitable soil profiles.</p> <p>38. Monitoring shall be conducted on effluents and on receiving water bodies.</p>			
Civil Works	Interruption of power supply, water supply and	<p>39. Based on the pre-construction assessment of power and water supply locations, if the contractor identifies a risk to supplies from construction activities, the contractor will:</p>	Contractor	PMU/PMC	Included in bid price

Sub-Project Activity	Environmental Risk or Impact	Construction Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
	any other utilities	<ul style="list-style-type: none"> • Liaise with power or water supplier to identify an approach to minimise inconvenience to residents • Provide advance warning to residents (minimum 2 weeks in advance) that power/water supplies will be interrupted • Provide alternatives for residents if the supply interruption exceeds 2 days for water 			
Excavation	Unanticipated finding of artifacts	40. Upon a chance find of an artifact, all work will be stopped immediately, find left untouched, and the PIU will be notified to determine the next step and contact the responsible authority, if necessary.	Contractor	PMU/PMC	
Spoil and Borrow Site Management	Flora and Fauna Soil and land resources	41. Where possible existing borrow pits or spoil disposal sites shall be used. If new sites are needed, the contractor shall obtain approval from the relevant authorities and from PMU/PMC to ensure that sensitive habitats are avoided, and that appropriate mitigation and rehabilitation measures will be implemented. 42. obtain and document agreement with the landowner; 43. ensure minimisation of vegetation and habitat loss and limit land clearance to only the land required for the borrow pit / spoil disposal; 44. Set out the site boundaries and ensure that the surrounding land is not disturbed; 45. prohibit the use of burning to clear and control vegetation; 46. ensure that spoil is disposed of only at the designated disposal sites and that no material is side tipped along roads or down slopes, dumped on private or public land, or dumped in water bodies; 47. ensure that all necessary disposal site preparation activities are completed prior to the start of the related spoil generation, handling and disposal; 48. The contractor shall install erosion and sediment controls such as sedimentation ponds, non-erodible channels or bunds at each site and progressively adjust the measures as the landform changes, to minimise on-site erosion and prevent off-site sedimentation; 49. ensure that only inert waste is disposed of at spoil disposal sites; 50. ensure that roots and stumps and other vegetation debris are separated from the spoil materials prior to disposal and either mulched on-site for reuse in landscaping or ground stabilization works, left to decompose naturally, or otherwise safely disposed; 51. conduct routine inspections, not less frequently than once a week, of water pollution, erosion and sediment control measures, and promptly undertake necessary maintenance, repair and upgrading works to ensure that the design capacity is maintained; 52. undertake inspections within 24 hours of a heavy rainfall event; 53. undertake progressive rehabilitation of disturbed areas taking into consideration what the final land use will be; 54. conserve topsoil for later site rehabilitation;	Contractor	PMU/PMC	Included in bid price

Sub-Project Activity	Environmental Risk or Impact	Construction Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
		55. recontour the sites, fill depressions and revegetate the sites to create a final surface that is consistent with the original topography of the area; 56. design the final landforms and slopes to protect groundwater quality, to prevent surface water ponding, to facilitate revegetation, to convey runoff in a non-erosive manner, and to account for long term settlement; 57. revegetate the sites in such a way as to establish a diverse, effective, and long-lasting vegetative cover that is capable of self-regeneration without continued dependence on irrigation, soil amendments or fertilizer, and is at least equal in extent of cover to the natural vegetation of the surrounding area; 58. use appropriate native and non-invasive plant species for re-vegetation and rehabilitation work.			
Solid and Liquid Waste Management	Resource use and natural resource contamination	59. Preparation of a Solid and Liquid Waste Management subplan as part of the CEMP, which applies the waste hierarchy to ensure efficient use and management of resources with a priority to prevent waste at source as much as possible; 60. Effective management of materials on site through good housekeeping and work planning. 61. Clear arrangements for storage and transportation of all hazardous and non-hazardous waste to an authorized and approved disposal point as set out in the Waste Management Plan. 62. The wastes, especially hazardous waste shall be collected and stored in safety tanks and provide to license sub-contractor to dispose at licensed sites. 63. Prohibit burning of waste at all times. 64. Provide all vehicles/drivers with plastic bags for waste collection and prevent any unauthorized waste disposal with particular attention paid to prevention of waste entering water ways including irrigation canals.	Contractor	PMU/PMC	Included in bid price
Community Health and Safety	Human health and safety	65. Appropriate fencing, protective barriers, and buffer zones will be provided around all construction sites including barriers where needed on access roads and populated. 66. The construction campsites should be located outside and distance from residential area and fencing campsites with safety barriers and safety zones. 67. Sufficient signage giving health and safety warnings and information disclosure at all sites. 68. Develop Traffic Management Plan together with provision of safety signs, traffic safety control and regular monitoring the public safety or traffic safety management on construction sites on the streets in urban area. 69. Limited the driving speed in village/urban areas and other sensitive areas. Provide watering to reduce dust pollution in village and urban areas, when and where is dusty.	Contractor	PMU/PMC	Included in bid price
Occupational Health and	Human health and safety	70. Prepare a health and safety plan containing site-specific precautions in accordance with relevant occupational health and safety guidelines.	Contractor	PIU/PMU/PMC	Included in bid price

Sub-Project Activity	Environmental Risk or Impact	Construction Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
Safety and Emergency Response		<p>71. Appoint a full-time environment, health and safety officer for the entire 3-year construction period, who will be responsible for CEMP implementation and supervision and for ensuring compliance with applicable Cambodian environmental, health and safety legislation and with relevant IFC Environmental, Health and Safety guidelines.</p> <p>72. Adequate first aid equipment will be made available on site.</p> <p>73. Inspect and check the relevant construction equipment to ensure that it meets the applicable mechanical and safety requirements.</p> <p>74. Inspect the worksite to ensure that the equipment can be safely mobilized and operated, and that there are no unmitigated risks (typical factors to consider include: proximity and physical condition of nearby structures, soil classification, soft ground, surface and ground water).</p> <p>75. Conduct training of workers on work practices, health and safety measures, use of personal protective equipment and emergency response.</p> <p>76. Provide fall protection when workers are exposed to unguarded platforms or walkways higher than 2 m.</p> <p>77. Guard against danger to persons at work from falling objects (earth, rock or other material) by suitable sloping, shielding or shoring.</p> <p>78. Ensure there are safe ways to enter and exit the excavation.</p> <p>79. Trenches will have cave-in protection such as sloping, shielding or shoring.</p> <p>80. Materials will be kept at least 0.6 m away from the edge of a trench.</p> <p>81. Adequate ventilation will be secured at all workplaces so as to maintain an atmosphere fit for respiration.</p> <p>82. Excavations will be kept dry.</p> <p>83. Provision will be made for safety precautions when using high voltage electric power tools.</p> <p>84. The health and safety measures at the worksite will be inspected at least once in every day during which persons are at work there, and after any event likely to have affected the strength or stability of the excavation or the shoring.</p> <p>85. Daily toolbox meetings (safety briefings) will be carried out.</p> <p>86. An accident record book will be maintained where all major or minor accidents and incidents are recorded with actions taken.</p> <p>87. Worker education and awareness events for construction hazards will be given. A construction site safety program will be developed and distributed to workers.</p> <p>88. The contractor shall appoint an Environment, Health and Safety Officer who is qualified engineer.</p> <p>89. Training and awareness will be provided to the workers on safety management and HIV-AIDS.</p> <p>90. Ensure that all workers are equipped with and use Personal Protective Equipment (PEE).</p>			

Sub-Project Activity	Environmental Risk or Impact	Construction Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
		91. Warning signs will be set up if mud is likely on public roads. Mud will be removed at the end of each day. Other spillages on public roads will be removed immediately. 92. The Contractor will set out an Emergency Response Plan			
Protection against the COVID-19 disease	Transmission of SARS-CoV-2 virus	93. Plan and execute work in compliance with country-specific COVID-19 risk management regulations and directives including directions of the General Department of Labour, MoLVT. 94. Conduct workplace risk assessment to identify low, medium or high exposure risk to COVID-19. Prepare an action plan for prevention and mitigation of the spreading of COVID-19. 95. Monitor the implementation of COVID-19 measures and apply the checklists in Annex 6 . 96. Conduct Risk communication, training, and education. Training of workers in infection prevention and control practices. 97. Dissemination about COVID-19 prevention and mitigation measures to staff and workers through orientation or distributing leaflet/poster at information/safety board at each construction and camp site. 98. Daily checking temperature of staff and workers prior starting the works. 99. Staff and workers have to wear masks all the time and properly. 100. Do not share personal items or supplies such as phones, pens, notebooks, tools, etc. 101. Avoid common physical greetings, such as handshakes. 102. Maintain a minimum physical distance of one metre from others if possible. 103. Wash hands often with soap and water for at least 20 seconds after using the washroom, before handling food, after blowing nose, coughing, or sneezing, and before smoking. If hands are not visibly soiled, and soap and water are unavailable, alcohol-based hand sanitizer can be used. 104. All offices and jobsites implement additional cleaning measures of common areas. All door handles, railings, ladders, switches, controls, eating surfaces, shared tools and equipment, taps, toilets, and personal workstation areas are wiped down at least twice a day with a disinfectant, such as disinfectant wipes. Individuals are responsible for cleaning and disinfecting their workstations. 105. Commonly touched surfaces on vehicles and equipment are thoroughly cleaned and disinfected at the end of shifts and between users. 106. Coughing or sneezing into a tissue or the bend of your arm, not your hand; And dispose of any tissues you have used as soon as possible in a lined waste basket and wash your hands afterwards. Responding measures if there is a COVID-19 case: 107. Individuals who have been potentially exposed to the virus, or who are exhibiting flu-like symptoms such as fever, tiredness, coughing, or congestion are instructed to: Not come to work; Contact their supervisor and/or human resources	Contractor	PMU/PMC	Included in bid price

Sub-Project Activity	Environmental Risk or Impact	Construction Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
		<p>department; Stay at home and self-isolate; and Contact local health authorities for further direction.</p> <p>108. Such individuals are required to follow the directions of the local health authority and may not return to work until given approval by the proper health authorities.</p> <p>109. Individual who begin to display flu-like symptoms on site are instructed to avoid touching anything, take extra care to contain coughs and sneezes, and return home immediately to undergo self-isolation as directed by the local health authority.</p> <p>110. All areas on site potentially infected by a confirmed or probable case are barricaded to keep individuals two meters away until the area is properly cleaned and disinfected.</p>			
Labour Camp Management	Contamination of water, soil, waste production and social issues	<p>111. If a camp for construction workers is required, the contractor will set out a camp management plan in the CEMP together with a location map and a site layout map indicating the site facilities and infrastructure.</p> <p>112. The camp will have adequate and separate accommodation and sanitation facilities for male and female workers, and the facilities will meet good standards of health, hygiene and comfort.</p> <p>113. There will be adequate supply of clean and safe water, adequate waste and wastewater disposal systems, appropriate protection against heat, cold, noise, damp, fire and disease-carrying or poisonous animals (e.g. insects)</p> <p>114. Relevant training on camp management will be provided to all staff.</p> <p>115. Priority will be given to employ local labour and retain evidence of how local labour recruitment efforts were undertaken.</p> <p>116. At the end of the construction phase, all camp facilities, structures, installations and pavements (above ground and below ground, fixed and moveable) will be dismantled or demolished and removed (reused, sold/recycled, disposed of as waste) from the site.</p> <p>117. All chemicals, waste and pollution will be removed and safely disposed of.</p> <p>118. Septic tanks and other sanitary/waste disposal systems will be emptied, and the content disposed of in accordance with local regulations. The installations will be excavated and removed.</p> <p>119. The site will be recontoured, depressions backfilled. Topsoil will be applied, and the site will be revegetated</p>	Contractor	PMU/PMC	Included in bid price
Pipe Network Installation	Socio-Economic (Accessibility)	<p>120. Warning given to residents 4 weeks in advance of any excavations</p> <p>121. Implement traffic management procedures to ensure smooth traffic. Provide traffic signs, control vehicle speeds and be able to warn drivers in advance for any changes to road surface or traffic direction</p> <p>122. Provide adequate and safe pedestrian and vehicular (motorbike) access to enter and exit buildings across any open trenches</p> <p>123. Temporary restoring/rebuilding the impacted assets or relocation of shops and</p>	Contractor	PMU/PMC	Included in bid price

Sub-Project Activity	Environmental Risk or Impact	Construction Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
		<p>stalls through cooperation, between construction contractor, HHs and PIU</p> <p>124. Define and adjust suitable working hours in urban areas or at sensitive sites. Open access road for entry and exit for business sites. Remove the unsuitable soil and materials(spoils) from construction sites which are in front of houses and shops</p> <p>125. Restoration or compensation of any damage to properties at an expense of the contractor</p> <p>126. Consideration and management of potential localized flood impacts.</p>			
Emergency Preparedness and Response	Emergencies	<p>127. Preparation of an Emergency Preparedness and Response Plan.</p> <p>128. The Emergency Preparedness and Response Plan will contain:</p> <ul style="list-style-type: none"> a. Emergency preparedness and response responsibilities b. Identification of hazards that may lead to an emergency situation c. Identification of people at risk d. Emergency response procedures e. Detection, evaluation and emergency level determination f. Notification and communication g. Emergency action h. Termination and follow-up i. Prevention and preparedness j. Training and exercises k. Emergency contacts <p>129. The Emergency Preparedness and Response Plan will address the following emergencies:</p> <ul style="list-style-type: none"> a. Traffic accident b. Serious injuries c. Fall in water d. Trench collapse or cave-in e. Fire f. Explosion g. Flooding h. Electrocution i. Chemical spill j. Structural collapse k. Poisoning 	Contractor	PMU/PMC	Included in bid price

Table 9: Operational Phase Mitigation Measures

Sub-Project Activity	Environmental Risk or Impact	Operational Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
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Sub-Project Activity	Environmental Risk or Impact	Operational Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
Start-up Phase Operation of the WWTP and networks	All	<ol style="list-style-type: none"> 1. The contractor shall develop an operation and maintenance manual for approval by the PMU and PMC. 2. The contractor shall operate the WWTP over a 6-month period. The contractor shall provide an operations and maintenance manager and relevant operations and maintenance staff to operate the WWTP and the wastewater and drainage networks. During the 6-month period, the contractor shall and conduct on-the-job training of the operator's staff. 	Contractor	MPWT MoE	Included in bid price
Operation of the WWTP	Surface Water	<ol style="list-style-type: none"> 3. Remove screenings and grit from the inlet and outlet works; 4. Cut grasses on the embankment, and remove it so that it does not fall in the ponds; 5. Remove floating scum and floating macrophytes from the surface of the maturation and facultative ponds. This will be done to maximise the light energy reaching the pond algae, increase surface re-aeration, and prevent fly and mosquito breeding; 6. Spray scum on the surface of the anaerobic ponds and not removing it, since this will help the treatment processes; 7. Remove any accumulated solids in the inlet and outlet works; 8. Repair any damaged embankment as soon as possible; and repairing any damage of the fences or gates. 9. Sludge management including treatment, disposal. 10. Operational water testing and control procedures to timely identify and troubleshoot operational problems. 11. Emergency procedures including schedule for testing and upgrading procedures. 12. Regularly monitor the wastewater system structures and provide maintenance or corrective actions. 13. Regular inspect the sewage system structures and provide maintenance or corrective actions 14. Conduct monitoring and reporting on water quality of receiving water after discharge from WWTP. The discharge of wastewater quality from WWTP shall always comply with discharged standards specified in sub-decree on Water Pollution Control 1999 for Public water area and sewer. 	Operator	MPWT MoE	Included in operational costs
Operation of the WWTP and wastewater network	Odour	<ol style="list-style-type: none"> 15. Regular monitoring and maintenance of the WWTP, pipelines and pump stations. 16. Quarterly meetings between operator and DPWT with residents and / or their representatives to identify odour or nuisance issues; 17. Movement of any sludge materials off site on days of low wind speed; 18. The sludge loading trucks shall be covered; 19. Provide tree plantings (tree screen) around the WWTP site to reduce propagation of odours; 20. Conduct air quality monitoring inside and near the WWTP. The air quality shall comply with national standards of Sub-decree on Air Pollution and Noise Disturbance 2000; 21. If odour monitoring indicates nuisance odour from the anaerobic ponds, then the 	Operator	MPWT MoE	Included in operational costs

Sub-Project Activity	Environmental Risk or Impact	Operational Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
		<p>course of the odour problem will be investigated (in most cases the course of odour problems from properly designed anaerobic ponds is poor maintenance or overloading) and as a short-term measure, it will be considered to install a deodorizing chemical mist spray or water mist spray in the areas which generates the odour to temporarily eliminate the bad odour until a permanent solution is found. Also, to reduce odour, it will be considered to install additional floating rafts with floating long rooted plants in the anaerobic pond.</p> <p>22. Use quick-disconnect fittings between pumper truck and receiving station to minimize exposure of septage to the atmosphere.</p> <p>23. Wash-down facilities to clean up any spills, with drainage into the holding tank</p> <p>24. Avoid free fall of septage by extending receiving pipes below the water surface</p> <p>25. Introduce septage at slow controlled rates to avoid turbulence or agitation.</p> <p>26. Ventilate the air from the tank to an odour biofilter.</p> <p>27. Clean tanks, trucks and equipment daily.</p> <p>28. Pump stations: To avoid septic conditions and generation of toxic gases in the pump stations' wet wells, a venting system will be installed to provide air circulation. If necessary, ventilation stacks with odour filter treatment (carbon filters, biofilter) will be added.</p> <p>29. Conduct routine hosing and debris removal at the pumping station wet wells to remove accumulated solids.</p>			
Operation of the WWTP: Management of hazardous materials	Water pollution, health and safety, fire	<p>30. All fuels or flammable solvents for operational use and any waste thereof will be stored on an impervious surface, under cover, in adequate tanks or containers and within secondary containment. A bund will be provided around any above ground fuel storage tank with capacity of 110% of the largest single tank. Storage of such materials will be at least 50 m from surface water bodies with no direct drainage to surface water.</p>	Operator	MPWT MoE	Included in operational costs
Operation of the WWTP and wastewater network	Community Health and Safety	<p>31. Community outreach initiatives, such as consultations, meetings and information campaigns regarding contact with wastewater.</p> <p>32. Coordinate with local public health officials to monitor incidence of water and air-borne sickness or disease in the local community and worker that could be caused by the operation of WWTP.</p> <p>33. Review emergency preparedness plans</p>	Operator	MPWT MoE	Included in operational costs
Operation of the WWTP and wastewater network	Occupational Health and Safety	<p>34. Preparation and implementation of a health and safety plan containing: (1) procedures to eliminate or minimize the risk of exposure to biological agents, (2) personal hygiene practices, (3) instructions in proper use of personal protective equipment, (4) emergency procedures.</p> <p>35. Conduct regular education of workers/staff on the health and safety plan.</p> <p>36. Conduct safety training sessions at the beginning of each shift.</p> <p>37. Avoid direct contact with sewage.</p> <p>38. Avoid aerosolizing wastewater or minimizing exposure time in areas where</p>	Operator	MPWT MoE	Included in operational costs

Sub-Project Activity	Environmental Risk or Impact	Operational Phase Mitigation Measures	Implemented by	Supervised by	Cost (\$)
		aerosolizing is occurring. 39. Provide first aid services, supplies and equipment. 40. Undertake regular health checks of workers/staff. 41. Use appropriate protective clothing at work (coveralls) and personal protective equipment (safety boots, gloves, plastic face shields, lifejacket) and, where required wearing respiratory protective equipment.			
Protection against the COVID-19 disease	Transmission of SARS-CoV-2 virus	42. Conduct workplace risk assessment to identify low, medium or high exposure risk to COVID-19. Prepare an action plan for prevention and mitigation of the spreading of COVID-19. 43. Conduct Risk communication, training, and education. Training of workers in infection prevention and control practices 44. Adopt engineering, organizational and administrative measures, plan work so employees can keep distance from each other and minimise contact. 45. Provide clear and visible guidelines on how to prevent infection at the construction site and initiatives taken. 46. Regularly clean and disinfect toilet and bathrooms 47. Promote personal hygiene (including hand and respiratory hygiene), make wash basins and sanitizers available 48. Screen on entry the temperature of each person entering the work site and record their contact details to facilitate tracking of infected persons should there be a need.	Operator	MPWT MoE	Included in operational costs

6 MONITORING PLAN

38. The project monitoring conducted under the EMP includes:

- (i) **Project readiness monitoring.** Monitoring to follow up progress on project readiness and close gaps through corrective actions.
- (ii) **Environmental quality monitoring.** To be conducted by a competent authority and/or persons or agency/organization approved by the Project Owner, involving the collection and analyses of air quality, noise and water quality data at designated monitoring locations for assessing compliance with applicable ambient environmental quality standards and emission standards during construction and operation.
- (iii) **EMP compliance monitoring.** To be conducted by the PMC-NES (contracted via the Project Management Consultants) to verify EMP compliance during project implementation.
- (iv) **Affected People monitoring (consultation).** To be conducted by the PIU-SFP by consulting affected people on the impacts during construction and operation.
- (v) **Operational monitoring.** This is required as part of the operations of the subproject and will be undertaken by the relevant government departments or a nominated private sector operator.

39. The engagement of a National Environmental Specialist for some months will be critical to ensuring the capacity and monitor of the PIU and contractor staffs and to ensuring monitoring is effective and that corrective actions are promptly identified and implemented.

6.1 Project Readiness Monitoring for Sub-Project

40. Before construction, the Project Management Consultant (PMC) will monitor the project readiness on environmental management based on a set of indicators as shown in **Table 10** and report it to ADB and PMU. This assessment will formally demonstrate that environmental commitments are being carried out and environmental management systems are in place before construction starts or suggest corrective actions to ensure that all requirements are met.

Table 10: Project Readiness Assessment Indicators

Indicator	Criteria	Are the Criteria met?	If No, What Corrective action is needed?	Date for Corrective Action Completion
		Yes/No		
1. EMP update	EMP updated after detailed design & approved by ADB	Y/N		
2. Compliance with loan covenants	The borrower complies with loan covenants related to project design and environmental management	Y/N		
3. Public involvement effectiveness	Meaningful consultation completed	Y/N		
	GRM established with entry points	Y/N		
4. Environmental supervision and monitoring in place	Recruitment of external staff as set out in the Institutional Arrangements for this EMP	Y/N		
	Nomination of government staff for PMU and PIU roles as set out in the Institutional Arrangements for this EMP	Y/N		
5. Bidding documents and contracts with environmental safeguards	Bidding documents and contracts incorporate the environmental activities and mitigation measures required by this EMP	Y/N		
	Bidding documents and contracts incorporate the Particular Conditions for bidding (see	Y/N		

Indicator	Criteria	Are the Criteria met?	If No, What Corrective action is needed?	Date for Corrective Action Completion
		Yes/No		
	Annex 33)			
6. EMP financial support	The required funds have been set aside for EMP implementation including training and capacity building	Y/N		

6.2 Environmental Quality Monitoring

41. During construction, the impact on the sensitive environmental receptors will be monitored and compared against the relevant national or international recognized environmental standards. The environmental quality monitoring programme for the construction phase is outlined in **Table 11**.
42. During operation, the PIU and the operator are expected to allocate an adequate budget to ensure environmental monitoring. The environmental quality monitoring programme for the operational phase is summarised in **Table 12**.
43. The applicable ambient environmental quality standards and effluent standards are referenced in **Annex 4**.

Table 11: Construction Phase Environmental Quality Monitoring

Environmental Indicators	Location	Frequency	Responsibility		Estimated Costs (USD)	
			Supervision	Implementation	Per Sample	Total Cost
Air Quality: PM10, NO ₂ , SO _x	Two locations Nearest residential area to the WWTP	1 day (24-hr) per 6 months. More often if standards are exceeded or complaints are filed	PIU/PMC	Contractor	\$1000	\$12000
Construction Noise: 1. LAeq(1-hour) 2. LAmax 3. LAeq(daytime) 4. LAeq(evening) 5. LAeq(night-time)	One location at construction site in the City, and Nearest residential area to the WWTP	1 day (24 hours) per 6 months. More often if standards are exceeded or complaints are filed	PIU/PMC	Contractor	\$300	\$3600
Water Quality: Temp, pH, DO, BOD, COD, EC, TSS, NH3-N, Total nitrogen, Total Phosphorus, Oil and Grease, <i>E.coli</i> , Total Coliform	In stream draining the WWTP site upstream and downstream the construction work	Every 3 months during periods with flow in the stream and when construction is on-going (The stream is likely only to flow in the rainy season)	PIU/PMC	Contractor	\$100	\$1200

Table 12: Operational Phase Environmental Quality Monitoring

Environmental Indicators	Location	Method & Frequency	Responsibility		Estimated Costs (USD)	
			Supervision	Implementation	Per Sample	Total per site/yr
Treatment process monitoring: Inlet and outlet flow rates, Temp, pH, DO, BOD5, COD, total N, total P, TSS, TDS, <i>E.coli</i> , total coliform bacteria	Each step in the treatment process	Weekly during the first 6 months of operations, thereafter monthly or more often in case of performance problems	PIU	Operator	Included in operational costs – O&M Budget	

Environmental Indicators	Location	Method & Frequency	Responsibility		Estimated Costs (USD)	
			Supervision	Implementation	Per Sample	Total per site/yr
Effluent Quality: Temp, Colour, Odour, DO, pH, EC, TSS, BOD5, COD, total P, N total, As, Fe, Cu, Pb, Cd, Zn, Oil and Grease, <i>E.coli</i> , Total Coliform	Effluent outfall	Every 6 months More often if standards are exceeded or complaints are filed	MoE, MPWT	Operator	Included in operational costs – O&M Budget	
Effluent Quality: Temp, pH, DO, BOD5, COD, NH3-N, TSS, TDS, <i>E.coli</i>	Effluent outfall	Monthly	MoE, MPWT	Operator	Included in operational costs – O&M Budget	
Odour	Site boundary (upwind and downwind) Nearest residential area of the WWTP	Weekly during the first 6 months of operations thereafter monthly or more often in case of complaints Systematic use of the human nose (summary of procedures in Annex 5)	MoE, MPWT	Operator	Included in operational costs – O&M Budget	
Ambient Water Quality: Temp, DO, pH, Colour, Odour, TSS, BOD5, COD, NH3-N, total P, total N, As, Fe, Cu, Pb, Cd, Zn, Oil and Grease, <i>E.coli</i> , total Coliform	Mekong River upstream and downstream the outlet from the stream that receives the treated wastewater	In case of non-compliance with the effluent standards	MoE, MPWT	Operator	Included in operational costs – O&M Budget	
Worker & public injury associated with WWTP operations	On property of WWTP	Regular record keeping	MPWT Ministry of Labour and Vocational Training	Operator	Included in operational costs – O&M Budget	

6.3 Recommended Field Monitoring Standards

6.3.1 Noise

- IEC 61672-1 Electroacoustics - Sound Level Meters - Part 1: Specifications
- IEC 61672-2 Electroacoustics - Sound level meters - Part 2: Pattern evaluation tests
- IEC 60942 IEC 60942 - Electroacoustics - Sound calibrators

6.3.2 Odour

- Environmental Protection Agency (Ireland), Office of Environmental Enforcement, Odour Emissions Guidance Note (Air Guidance Note AG9), September 2019³. See also **Annex 5** with a summary of the odour impact assessment procedures

6.3.3 Wastewater Sampling

- United States Environmental Protection Agency Region 4, Operating Procedures, Wastewater Sampling, 2017⁴

6.3.4 Surface Water Quality

- United States Geological Survey National Field Manual for the Collection of Water-Quality Data⁵
- ISO 5667-3:2018, Water quality — Sampling — Part 3: Preservation and handling of water samples
- ISO 5667-4:2016, Water quality — Sampling — Part 4: Guidance on sampling from lakes, natural and man-made

6.4 EMP Compliance Monitoring

44. In order for the EMP to be effective, all its mitigation measures must be monitored to ensure they are implemented. Note this applies to construction only; during operation, it is the responsibility of the appropriate ministries or its line departments to ensure monitoring of operational facilities is incorporated in the operations and maintenance manual and carried out routinely. Compliance monitoring requirements are summarized in **Table 13**.

³ <https://www.epa.ie/pubs/advice/air/emissions/Odour%20Emissions%20Guidance%20Note%20AG09.pdf>

⁴ <https://www.epa.gov/quality/procedures-collecting-wastewater-samples>

⁵ https://www.usgs.gov/mission-areas/water-resources/science/national-field-manual-collection-water-quality-data-nfm?qt-science_center_objects=0#qt-science_center_objects

Table 13: Construction Phase EMP Compliance Monitoring

Environmental Indicators	Location	Method & Frequency	Responsibility		Estimated Costs (USD)
			Verification	Implementation	
Air Quality	Construction sites and surroundings	Monthly checking against mitigation measures specified in this EMP	PMC-NES	Contractor	Included in Construction contract
Noise	Construction sites and surroundings	Monthly checking against mitigation measures specified in this EMP	PMC-NES	Contractor	Included in Construction contract
Flora	Construction sites	Monthly checking against mitigation measures specified in this EMP	PMC-NES	Contractor	Included in Construction contract
Water Quality	Construction sites and recipients	Monthly checking against mitigation measures specified in this EMP	PMC-NES	Contractor	Included in Construction contract
Soil and land resources	Quarries, Borrow and Spoil Disposal Sites and their surroundings	Monthly checking against mitigation measures specified in this EMP	PMC-NES	Contractor	Included in Construction contract
Resource use and natural resource contamination	Construction sites	Monthly checking against mitigation measures specified in this EMP	PMC-NES	Contractor	Included in Construction contract
Human health and safety	Construction sites Labour camp	Monthly checking against mitigation measures specified in this EMP	PMC-NES	Contractor EHS Officer	Included in Construction contract
Contamination of water, soil, waste production and social issues	Construction sites Labour camp	Monthly checking against mitigation measures specified in this EMP	PMC-NES	Contractor	Included in Construction contract
Community Issues <ul style="list-style-type: none"> • Environmental impacts of civil works (e.g., solid & liquid waste, erosion, local flooding, pollution). • Any unforeseen impacts caused by accidentally e.g. through spillages • Civil nuisance (e.g., noise, disrupted business & farming activity, social issues, community health and safety). • Impaired use of access roads 	Construction sites	Consultation interview with Affected People Using the form in Annex 11 . 4-6 weeks after construction starts Every 2 months until end of construction	PMU-ESO	PIU-SFP	Included in PIU staff/travel budget

Environmental Indicators	Location	Method & Frequency	Responsibility		Estimated Costs (USD)
			Verification	Implementation	
(e.g. traffic issues and access). • GRM and its procedures & key contacts					
Socio-Economic (accessibility)	All sites of pipe excavations in urban areas	Visual inspection and record. 4-6 weeks after construction starts Every 2 months until end of construction	PMU-ESO	PIU-SFP	Included in PIU staff/travel budget

7 PUBLIC CONSULTATION

45. The Consolidated IEE for this subproject contains details of the consultation undertaken during preparation of these sub-projects. In addition, consultation will take place during implementation. The PIU Safeguard Focal Point (PIU-SFP) will undertake consultation after detailed designs are completed and will conduct consultation interviews within 4-6 weeks of construction starting and then again, every 3 months until the end of construction. This is set out in the Environmental Monitoring Plan which is provided in the Environmental Management Plan for each sub-project.
46. Informal monitoring interviews with affected people will focus on complaints about community disturbance from construction activities, such as construction noise, dust, solid waste and wastewater, as well as public concerns about ecological protection, soil / land concerns and access issues. A sample Environmental Monitoring Interview Form is given in **Annex 11** which will contribute to project monitoring.
47. The IEE for these sub-projects also includes information on consultation undertaken during preparation of this EMP and can be consulted or discussed for reference.

8 GRIEVANCE REDRESS MECHANISM

8.1 GRM Objective

48. A grievance redress mechanism (GRM), consistent with the requirements of the ADB Safeguard Policy Statement (2009) has been established to prevent and address community concerns, reduce risks, and assist the project to maximize environmental and social benefits. In addition to serving as a platform to resolve grievances, the GRM has been designed to help achieve the following objectives: (i) open channels for effective communication, including the identification of new environmental issues of concern arising from the project; (ii) demonstrate concerns about community members and their environmental well-being; and (iii) prevent and mitigate any adverse environmental impacts on communities caused by project implementation and operations. The GRM is accessible to all members of the community.

8.2 Proposed GRM System

49. In Cambodia, there is currently no existing legally established system to resolve environmental concerns and complaints. The MPWT, established a Grievance Redress Mechanism (GRM) on 18 January 2019 to receive and facilitate resolution of affected peoples' concerns and grievances about social or environmental impacts associated with the subproject. The GRM will address such concerns and complaints promptly, using a transparent process that is readily accessible to all affected persons. The GRM will contain multiple entry points to allow affected people to approach the Contractor, PIU, their local leaders, the Ministry of Public Works and Transport or ADB. . Grievances can be filed in writing or verbally with any entry point of the GRM. The committee will have 15 days to respond with a resolution. The PMU's Environment Safeguards Officer (PMU-ESO) will oversee/manage the implementation/observance of the mechanism and will be responsible for keeping the PMU informed. The PIU Safeguards Focal Point (PIU-SFP) will be responsible for ensuring GRM implementation at the sub-project level.

50. The GRM will accommodate both informally and formally lodged eligible, grievances. Informally lodged grievances are those received by the contractor during construction. Formally lodged grievances are those received at District and Commune Council offices or direct to the PIU. Commune Councils evaluate complaints for eligibility and then report to PDPWT. The PDPWT and PMU maintain record of all grievances, informally and formally lodged, eligible and ineligible. The PMU will inform the MPWT, as necessary, and report on the observance/implementation of the GRM in the monthly progress reports and in the periodic Environmental Monitoring Report that will be submitted to the MPWT.

8.2.1 Access to the Mechanism

51. Any person who has environmental issues pertaining to the subproject during detailed design, construction and operation phases will have access to the mechanism free of charge. The PMU, through its Environment Safeguards Officer (PMU-ESO) and staff in the MPWT, will ensure that:
- (i) The public and all stakeholders are aware of their rights to access, and will have access to, the GRM free of administrative and legal charges; and
 - (ii) The GRM is fully disclosed prior to construction: (a) in public consultations, (b) through posters displayed in the commune office (posters to include names and contact details of the PIU-SFP).
52. The Access Points to the GRM are critical for ensuring it is useable for affected people (APs). The GRM Access points for this project, as set out in this GRM Mechanism will be:
- The Contractors
 - District and Commune Councils
 - The PIU office
 - The Provincial Department of Public Works and Transport (PDPWT).

8.2.2 GRM Steps and Timeframe

53. Grievances raised on environmental impacts are critical to the health and safety of APs. Hence, the proposed mechanism intends to be easily accessible and promptly responsive to APs' complaints.

8.3 Informal Approach

54. Informally, APs can lodge complaints directly to the contractor during construction. PMU to provide contractor with GRM contact details which the contractor will use to print 'GRM Contact Cards' for its staff to hand to complainants and will keep cards with all vehicles, machinery and site managers/foremen.
55. Contractor to raise awareness of all workers on how to respond when an AP or member of the public has a complaint i.e. direct the person to the most senior site manager present at the time and/or Contractor GRM focal point and prepare a 'GRM Contact Card'.
56. The contractor shall document and assess the complaint immediately. If assessment validates the complaint as within the scope of the GRM/eligible, the contractor shall act on the complaint within three days from receipt of complaint. MPWT shall obtain a written confirmation of satisfaction from the AP after 7 days from completion of resolution by the contractor
57. If assessment invalidates the complaint (i.e., reveals the complaint as ineligible or not associated with the project's environmental performance), the contractor shall direct the

AP to the Commune Council and shall report the complaint to MPWT within 2 days from receipt of complaint, stating reasons for ineligibility.

8.4 Formal Approach

58. If complaint is eligible but is not acted on within three days from receipt of complaint, or if AP is not satisfied with the resolution undertaken by the contractor, he/she can access the formal mechanism, as shown in **Table 14**.

Table 14: GRM Steps

Step	Action
Step 1: Lodging a Complaint (Day 1)	AP lodges complaint, by him/herself or with assistance from the village chief or district council, at the access point with the Commune Council. The complaint may also be lodged with the PIU or PDPWT,
Step 2: Documentation & Registration of Complaint (Day 1)	Commune Council, PIU/PMU or PDPWT documents/registers lodged complaint, makes sure these are referenced and provides AP with a copy of referenced complaint. The commune forwards complaint document to the MPWT. A copy of a proposed GRM Complaint Form is in Annex 2
Step 3: Assessment and Discussion (Day 1 to 3)	AP shall be informed if the grievance is eligible or ineligible. If it is ineligible, AP shall be directed to the district. If complaint is eligible, AP shall be informed of the expected action timelines as set out in the established mechanism
	If both of the AP and contractor/operator are available, the complaint shall be immediately reviewed, investigated and discussed. If not, both parties should agree to undertake the review, investigation and discussion within 3 days. The discussion will centre on the cause and action/measure to implement and will engage the PIU/PMU. After review and investigation, agreement on actions and measures and time involved shall be made with the AP. Agreement shall be properly documented and filed; MPWT, PIU/PMU, Commune Council and AP shall have copies
Step 4: Implementing the Agreed Resolution	(Day 3 to Day 4) If complaint is minor, i.e., not requiring further investigation and would be easy to resolve, the contractor/operator shall immediately implement agreed on action/resolution. (To be implemented by Day 8)
	If further investigation and/or procurement of supplies/parts would be necessary, the contractor/operator shall: (i) immediately provide the most suitable interim measure to reduce the magnitude of the impact; and (ii) start work on the final measure within 15 days from the day the complaint is lodged.
Step 5: Acceptance of Resolution (1 week after completion of action/measure taken)	If, according to the AP, the impact has been resolved satisfactorily, MPWT shall obtain a written confirmation of satisfaction from the AP. This confirmation will signify closure of grievance and will form part of the grievance documentation. The PIU, Commune Council and AP shall retain their copies of the confirmation.
Step 6: Monitoring and Evaluation (for 1 week after closure of grievance)	The MPWT shall monitor the effectiveness of the resolution for at least a week after closure of grievance (that is, when action implemented has been satisfactorily confirmed in writing by the complainant). Monitoring and evaluation shall be properly documented and included in the Environmental Monitoring Report
Step 7: Appeal for Dissatisfied AP	When dissatisfied (or, in the event the issue/impact persists despite actions undertaken), AP can appeal for assistance from the district in the elevation of his/her complaint to the provincial authority. The provincial authority shall call all parties concerned to review the history of the grievance and resolution process taken and assess the validity of the appeal.

59. **Appeals.** If appeal is found not valid, the provincial authority shall write the AP and declare the grievance closed. In the event of an appeal, the MPWT shall immediately report to the PMU. The PMU shall ensure that the ADB is immediately informed.
60. If appeal is assessed to be valid, provincial authority and the parties discuss and agree on the quick resolution of the issue. The PMU requires the contractor and operator to implement the agreed resolution. Should the issue continue to persist despite the second action, or the AP remain dissatisfied, the following steps will be taken:
61. **Special Mission or Judicial System.** If the complainant is still unsatisfied, the PMU/EA will inform ADB to convene a special mission to attempt a resolution prior to use of the Cambodian judicial system.
62. **Accountability Mechanism of the ADB.** In addition, affected people may always contact the Complaints Receiving Officer of the ADB via the following addresses which will be included in the sub-project signboard:
 - Complaints Receiving Officer, Accountability Mechanism
Asian Development Bank
ADB Headquarters, 6 ADB Avenue, Mandaluyong City 1550, Metro Manila, Philippines
(+632) 632-4444 loc. 70309, (+632) 636 2086, amcro@adb.org
Instructions available here: <http://www.adb.org/site/accountability-mechanism/how-file-complaint>.
63. Sufficient communication on the GRM including signs containing contact details of the GRM access points will be displayed at strategic locations to sustain the effective implementation of the mechanism.

9 REPORTING

64. Environmental monitoring reports (using ADB's integrated safeguards monitoring report format) will be prepared semi-annually for the EA by the Project Management Consultants in collaboration with PMU-ESO and sent to the MoE and ADB. The reports will table all indicators measured with the monitoring plan of EMP including performance monitoring indicators and will include relevant national environmental quality standards. The reporting requirements are summarised in **Table 15**.

Table 15: Reporting Requirements

Report	Frequency	Purpose	From	To
Contractors' Progress Report	Monthly	EMP Implementation Progress and Monitoring Results	Contractor	PMU
Project Progress Report	Monthly	Confirm Mitigation Measures	International National Env Specialists with PIU-SFP	PMU
Project Progress Report	Quarterly	Progress of environmental safeguards implementation	PMC for PMU	EA
Environmental Monitoring Report	Semi-Annual	Full EMP Implementation and Adherence to Environmental Covenants/Conditions	PMC for PMU	ADB
WWTP Operation	Quarterly	Surface and groundwater Quality. Effluent quality, sludge disposal, health and safety	Operator	EA

9.1 Mechanisms for Feedback and Adjustment

65. Based on environmental monitoring and reporting systems in place, the PMU shall assess whether further mitigation measures are required as corrective action, or improvement in environmental management practices are required. The effectiveness of mitigation measures and monitoring plans will be evaluated by a feedback reporting system. The PMU will play a critical role in the feedback and adjustment mechanism. If the PMU identifies a substantial deviation from the EMP, or if any changes are made to the project scope that may cause significant adverse environmental impacts or increase the number of affected people, then the PMU shall immediately consult MoE, MPWT and ADB to get approval and identify EMP adjustment requirements.

10 ESTIMATED COST OF EMP

66. The budgeting and costing related to the implementation of the EMP are presented in the following tables:

- **Table 16** refers to the training events listed in *Error! Reference source not found.*
- **Table 17** refers to relevant pre-construction activities listed in **Table 7**
- **Table 18** refers to construction phase activities listed in **Table 8**
- **Table 19** refers to the operational phase activities listed in **Table 9** and monitoring during operations listed in **Table 12**
- **Table 20** refers to the construction phase environmental quality monitoring programme in **Table 11**.

Table 16: EMP Training Budgets

Training	Responsible	Quantity	Budgeting / Cost
1. EMP implementation for PMU, PIU, contractors	PMC	2 events, 2 days	PMC Contract
2. Grievance Redress Mechanism for PMU, PIU, contractors, Commune Councils	PMC	2 events, 1 day	PMC Contract
3. Pollution control for PMU, PIU, contractors	PMC	1 event, 2 days	PMC Contract
4. Environmental monitoring for PMU, PIU, contractors and operators	PMC	1 event, 2 days	PMC Contract
5. Operation and Maintenance for the Operator staff	Contractor	Daily for 6 months	Construction Contract

Table 17: EMP Pre-construction Budgets

Pre-Construction Phase Mitigation Measures	Implementor	Budgeting / Costs
UXO survey and clearance	Contractor	Included in the Construction Contract
Tree survey and inventory	Contractor	Included in the Construction Contract
Updating of the IEE and EMP	PMU/PMC	PMC contract
Preparation of the CEMP	Contractor	Included in the Construction Contract

Table 18: EMP Construction Budgets

Construction Phase Mitigation Measures	Implementor	Budgeting / Costs
Air quality management	Contractor	Included in the Construction Contract
Noise management	Contractor	Included in the Construction Contract
Surface Water and Groundwater control	Contractor	Included in the Construction Contract
Unanticipated finding of artifacts	Contractor	Included in the Construction Contract
Flora and Fauna management	Contractor	Included in the Construction Contract
Solid and Liquid Waste Management	Contractor	Included in the Construction Contract
Community health and safety	Contractor	Included in the Construction Contract
Occupational health and safety	Contractor	Included in the Construction Contract
Transmission of SARS-CoV-2 virus prevention	Contractor	Included in the Construction Contract
Labour camp management	Contractor	Included in the Construction Contract
Emergency management	Contractor	Included in the Construction Contract
PPE construction phase	Contractor	Included in the Construction Contract: Estimated to 6,500 USD

Table 19: EMP Operational Phase Budgets

Operational Phase Mitigation Measures	Implementor	Budgeting / Costs
Preparation of Operations Manual	Contractor	Included in the Construction Contract
PPE operational phase	Contractor	Included in the Construction Contract: Estimated to 2,000 USD
Laboratory Equipment and Supplies: (spectrometer, portable pH-meter, DO-meter, COD analytical instrument, laboratory supplies)	Contractor	Included in the Construction Contract: Estimated to 21,000 USD
Effluent monitoring	Operator	Included in the Operations Budget Estimated to 1,200 USD per year
Odour control and monitoring	Operator	Included in the Operations Budget
Hazardous Materials Management	Operator	Included in the Operations Budget
Occupational Health and Safety	Operator	Included in the Operations Budget
Community Health and Safety	Operator	Included in the Operations Budget
Protection against the COVID-19 disease	Operator	Included in the Operations Budget

Table 20: Construction Phase Environmental Quality Monitoring Cost Estimate

	Number of stations	Frequency	Monitoring events (3-year period)	Unit price [USD]	Total Cost [USD]
Air quality	2	every 6 months	12	1,000	12,000
Construction noise	2	every 6 months	12	300	3,600
Surface water quality	2	every 3 months in rainy season	12	100	1,200
Total					16,800

67. As indicated in **Table 18**, the contractor is required to incorporate the costs associated with the implementation of the mitigation measures during construction into the

appropriate work and budget items in the bill of quantities. Most of the environmental mitigation measures are (or shall be) by design built into or form part of delivering the various construction activities, structures and installations. The environmental management costs are therefore built into the respective budget lines and cannot be specifically separated out. However, the bill of quantities will include specific budget lines for the environmental and health and safety management items that clearly constitute separate / independent activities or deliverables. These include provision of personal protective equipment for the workforce and visitors (**Table 18**), and provision of certain environmental measurement equipment that the contractor shall deliver for the landfill operations (**Table 19**), and implementation of environmental quality monitoring during the construction phase (**Table 20**).

68. The water quality monitoring cost estimates are based on the price list from the laboratory under the Ministry of Environment and do not include the cost of sampling.
69. The selected operator, private sector or government, will bear all environmental monitoring and reporting costs during the operational stage. EMP operational environmental mitigation and monitoring measures will be incorporated in the operations and maintenance manual.

11 CONCLUSION

70. The EMP, if implemented as directed, will mitigate impacts on the natural environment and affected people to an acceptable level. The key parties for mitigation measure implementation are the construction contractor and the plant operator. The implementation of the EMP will be closely monitored and reported on by the relevant stakeholders in the project.
71. The most significant impacts from the project will arise from facility operation. A comprehensive training and capacity building component is therefore incorporated into the subproject. This is essential for ensuring that the investment is both financially and environmentally sustainable and beneficial.
72. A robust Grievance Redress Mechanism will be established, as outlined in the EMP. The GRM will ensure that grievances associated with the subproject implementation are managed swiftly and to the reasonable satisfaction of all parties.
73. Overall, the project is anticipated to bring environmental benefits to the residents and visitors to Stung Treng City. It will serve to improve the current wastewater and drainage problems and will provide long term environmental improvements.

Annex 1: Affected Person Monitoring Form

Date of Interview		Interviewer Name	
Interview Site: Where is the interview held? In school, on the road, in shop		Stakeholder Name & Status: Full name, status is business owner, schoolteacher, religious leader, resident	
Construction Site & Date Construction Started Which road, GPS location if available		Has this stakeholder been interviewed before? Yes (when were they interviewed) No	

Interview Discussion Points:

1. NOISE	Record of Discussion
Before the project started, was the person disturbed by noise? If yes, explain how and when. Where did the noise come from? E.g. traffic, machinery, people, music When did it disturb the person? E.g. all day, at night, intermittently	
During the construction, is the person disturbed by noise from the project? If yes, explain how and when. What type of noise and where did the noise come from? All day, at night, intermittently?	
If noise from construction is a problem, what changes does the person suggest are made?	
2. AIR QUALITY	Record of Discussion
Before the project started, was the person affected by air pollution or dust? If yes, explain how and when. Where did the pollution or dust come from? E.g. traffic, machinery, construction, burning garbage, cooking stoves When was the dust or pollution a problem? E.g. all day, at night, intermittently	
During the project, is the person disturbed by dust or pollution? If yes, explain how and when. What type of noise and where did the noise come from? E.g. increased traffic congestion, construction machinery, construction workers, burning construction garbage etc When did it disturb the person? E.g. all day, at night, intermittently	
3. VEGETATION AND LAND USE	Record of Discussion
Before the project started, what was the vegetation like in the project area? E.g. pastureland, trees, shrubs, rice fields.	
During the project, has the person found the vegetation situation has changed? If yes, explain how and when.	
If impact on vegetation is unacceptable, what changes does the person suggest are made?	
4 COMMUNITY SAFETY	Record of Discussion

Before the project started, can you describe the community safety situation in the project area? E.g. no problems, some accidents, difficulty crossing the roads	
During the project, has the person found the community safety situation has changed? If yes, explain how and when. Slower traffic so easier to cross the roads, construction vehicles are making a crossing harder / easier, more accidents / less accidents, construction site dangers	
If change in road safety is unacceptable, what changes does the person suggest are made?	
5. WATER QUALITY	Record of Discussion
Before the project started, was the person affected by poor water quality? If yes, explain how and when. Ground water? Surface Water? which Water source? How was it polluted?	
During the project, is the person affected by water pollution? If yes, explain how and when. Ground water? Surface Water? which Water source? How is quality being affected?	
If water quality from the construction is a problem, what changes does the person suggest are made?	
6. ACCESS	Record of Discussion
During the project, is the person affected by reduced access to their business, home or land? Access to what is limited, and how?	
If access limitations are not acceptable, please suggest changes which can be made?	
7. OTHER ISSUES	Record of Discussion
Any other issues about the construction sites that the person wants to discuss? E.g. wastewater concerns, waste disposal, Other concerns, labour force,	

Annex 2: GRM – Complaint Recording Form

PIU Staff Responsible: (name and role)	
Date: (of this record)	

Date of Complaint:	
Date Resolution Required by (15 days from initial complaint):	
Complaint Made by: (Name & Contact Details)	
Method of Complaint: (direct to PMU, via Contractor, Via Commune People's Council)	
Details of Complaint: (issues, actions taken so far, when did it start – all details needed)	
PMU Actions: (Next steps for PMU to resolve the issue or to move complaint to next level)	
Follow Up Actions Needed and Date: (PMU to follow up on resolution if needed, e.g. check contractor actions)	

Annex 3: Particular Conditions (For Bidding Documents)

The following clauses shall be added to the Bidding Document, Section 8 Particular Conditions in relation to the Environmental Safeguards for the Project:

- a) The contractor will undertake to develop and submit to the PMU/PMC for approval, a Construction Environmental Management Plan with the following management subplans:
- Air emissions management and monitoring
 - Noise management and monitoring
 - Hazardous materials management
 - Erosion and sediment control
 - Surface water and groundwater monitoring
 - Community and Occupational Health and Safety
 - Emergency Preparedness and Response
 - Traffic Management
 - Labour Camp Management
 - COVID-19 health and safety subplan in accordance with national COVID-19 instructions and regulations.
- b) The subplans shall be sufficiently detailed as to allow a clear understanding of the approach the contractor will take to mitigate environmental impacts during construction. The contractor shall adhere to the management subplans at all times unless prior agreement has been given by the PMU under extenuating circumstances.
- c) The Contractor shall commit to ensuring a full-time environmental health and safety officer on site who is competent, nominated to manage health and safety risks, and who can implement the EMP requirements for occupational health and safety and ensure relevant health and safety legislation is followed.
- d) The Contractor shall commit to enabling the project staff or consultants tasked with monitoring, full access to all information and data required in order that the Environmental Management Plan can be fully monitored.

Annex 4: Environmental Quality Standards

(1) Ambient Air Quality Standards

Source: Sub-decree No. 42 ANRK.BK on Air Pollution Control and Noise Disturbance, MoE 2000.

Parameter	Averaging Period	Unit	Standard
Nitrogen Dioxide (NO ₂)	24 hours	mg /m ³	0.1
Sulfur Dioxide (SO ₂)	24 hours	mg /m ³	0.3
Carbon Monoxide (CO)	24 hours	mg /m ³	20
PM 2.5 WHO Ambient Air Quality Guidelines (2005)	24 hours	µg/m ³	25
PM 10 WHO Ambient Air Quality Guidelines (2005)	24 hours	µg/m ³	50

(2) Ambient Noise Standards

Source: Sub-decree No. 42 ANRK.BK on Air Pollution Control and Noise Disturbance, MoE, 2000.

Area	06:00-18:00 dB(A)	18:00-22:00 dB(A)	22:00-06:00 dB(A)
Quiet area (hospital, school)	45	40	5
Residential area	60	50	45
Commercial area	70	65	50
Area with factories mixed with housing	75	70	50

(3) Surface Water Quality Standard

Referring to Sub-decree, No. 27 ANRK.BK on Water Pollution Control, MoE, 1999, the standards of water quality are divided as follows:

Annex 2 of Sub-decree on Water Pollution Control

Effluent standard for pollution sources discharging wastewater to public water areas or sewer

No	Parameters	Unit	Allowable limits for pollutant substance discharging to	
			Protected public water area	Public water area and sewer
1	Temperature	°C	< 45	< 45
2	pH		6 – 9	5 - 9
3	BOD ₅ (5 days at 20 °C)	mg/l	< 30	< 80
4	COD	mg/l	< 50	< 100
5	Total Suspended Solids	mg/l	< 60	< 120
6	Total Dissolved Solids	mg/l	< 1000	< 2000
7	Grease and Oil	mg/l	< 5.0	< 15
8	Detergents	mg/l	< 5.0	< 15
9	Phenols	mg/l	< 0.1	< 1.2
10	Nitrate (NO ₃)	mg/l	< 10	< 20

No	Parameters	Unit	Allowable limits for pollutant substance discharging to	
			Protected public water area	Public water area and sewer
11	Chlorine (free)	mg/l	< 1.0	< 2.0
12	Chloride (ion)	mg/l	< 500	< 700
13	Sulphate (as SO ₄)	mg/l	< 300	< 500
14	Sulphide (as Sulphur)	mg/l	< 0.2	< 1.0
15	Phosphate (PO ₄)	mg/l	< 3.0	< 6.0
16	Cyanide (CN)	mg/l	< 0.2	< 1.5
17	Barium (Ba)	mg/l	< 4.0	< 7.0
18	Arsenic (As)	mg/l	< 0.10	< 1.0
19	Tin (Sn)	mg/l	< 2.0	< 8.0
20	Iron (Fe)	mg/l	< 1.0	< 20
21	Boron (B)	mg/l	< 1.0	< 5.0
22	Manganese (Mn)	mg/l	< 1.0	< 5.0
23	Cadmium (Cd)	mg/l	< 0.1	< 0.5
24	Chromium (Cr+3)	mg/l	< 0.2	< 1.0
25	Chromium (Cr+6)	mg/l	< 0.05	< 0.5
26	Copper (Cu)	mg/l	< 0.2	< 1.0
27	Lead (Pb)	mg/l	< 0.1	< 1.0
28	Mercury (Hg)	mg/l	< 0.002	< 0.05
29	Nickel (Ni)	mg/l	< 0.2	< 1.0
30	Selenium (Se)	mg/l	< 0.05	< 0.5
31	Silver (Ag)	mg/l	< 0.1	< 0.5
32	Zinc (Zn)	mg/l	< 1.0	< 3.0
33	Molybdenum (Mo)	mg/l	< 0.1	< 1.0
34	Ammonia (NH ₃)	mg/l	< 5.0	< 7.0
35	Dissolved Oxygen	mg/l	>2.0	>1.0
36	Polychlorinated Biphenyl	mg/l	<0.003	<0.003
37	Calcium	mg/l	<150	<200
38	Magnesium	mg/l	<150	<200
39	Carbon tetrachloride	mg/l	<3	<3
40	Hexachloro benzene	mg/l	<2	<2
41	DDT	mg/l	<1.3	<1.3
42	Endrin	mg/l	<0.01	<0.01

No	Parameters	Unit	Allowable limits for pollutant substance discharging to	
			Protected public water area	Public water area and sewer
43	Dieldrin	mg/l	<0.01	<0.01
44	Aldrin	mg/l	<0.01	<0.01
45	Isodrin	mg/l	<0.01	<0.01
46	Perchloro ethylene	mg/l	<2.5	<2.5
47	Hexachloro butadiene	mg/l	<3	<3
48	Chloroform	mg/l	<1	<1
49	1,2 Dichloro ethylene	mg/l	<2.5	<2.5
50	Trichloro ethylene	mg/l	<1	<1
51	Trichloro benzene	mg/l	<2	<2
52	Hexachloro cyclohexene	mg/l	<2	<2

Remark: The Ministry of Environment and the Ministry of Agriculture, Forestry and Fishery shall collaborate to set up the standard of pesticides which discharged from pollution sources.

Annex 4 of Sub-decree on Water Pollution Control

Water Quality Standard in public water areas for bio-diversity conservation

Source: Sub-decree No. 42 ANRK.BK on Water Pollution Control, MOE, 1999.

a) River

Parameter	Standard	
	Unit	Value
pH	mg/l	6.5 – 8.5
BOD5	mg/l	1 – 10
Suspended Solid	mg/l	25 – 100
Dissolved Oxygen	mg/l	2.0 - 7.5
Coliform	MPN/100ml	< 5000

b) Lakes and Reservoirs

Parameter	Standard	
	Unit	Value
pH	mg/l	6.5 – 8.5
COD	mg/l	1 – 8
Suspended Solid	mg/l	1 – 15
Dissolved Oxygen	mg/l	2.0 - 7.5
Coliform	MPN/100ml	< 1000
Total Nitrogen	mg/l	1.0 – 0.6
Total Phosphorus	mg/l	0.005 – 0.05

Annex 5 of Sub-decree on Water Pollution Control:

Water Quality Standard in public water areas for public health protection. Source: Sub-decree No. 42 ANRK.BK on Water Pollution Control, MOE, 1999

No	Parameter	Unit	Standard Value
1	Carbon tetrachloride	µg/l	< 12
2	Hexachloro-benzene	µg/l	< 0.03
3	DDT	µg/l	< 10
4	Endrin	µg/l	< 0.01
5	Dieldrin	µg/l	< 0.01
6	Aldrin	µg/l	< 0.005
7	Isodrin	µg/l	< 0.005
8	Perchloroethylene	µg/l	< 10
9	Hexachlorobutadiene	µg/l	< 0.1
10	Chloroform	µg/l	< 12
11	1,2 Trichloroethylene	µg/l	< 10
12	Trichloroethylene	µg/l	< 10
13	Trichlorobenzene	µg/l	< 0.4
14	Hexachloroethylene	µg/l	< 0.05
15	Benzene	µg/l	< 10
16	Tetrachloroethylene	µg/l	< 10
17	Cadmium	µg/l	< 1
18	Total mercury	µg/l	< 0.5
19	Organic mercury	µg/l	0
20	Lead	µg/l	< 10
21	Chromium, valent 6	µg/l	< 50
22	Arsenic	µg/l	< 10
23	Selenium	µg/l	< 10
24	Polychlorobiohenyl	µg/l	0
25	Cyanide	µg/l	< 0.005

(4) Drinking Water Quality Standard

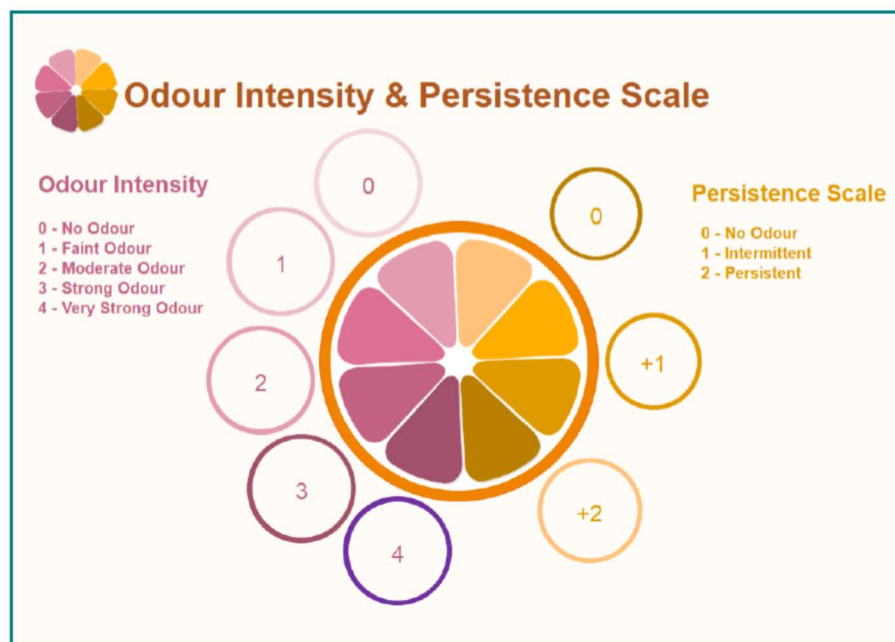
No	Parameter	Drinking Water Quality Standard	
		Unit	Value
1	pH	-	6.5-8.5
2	Turbidity	NTU	5.0
3	Dissolved Oxygen (DO)	mg/l	NV
4	Total Suspended Solid (TSS)	mg/l	NV
5	Chloride (Cl-)	mg/l	250
6	Nitrate (NO3)	mg/l	50
7	Phosphate (PO4)	mg/l	NV

No	Parameter	Drinking Water Quality Standard	
		Unit	Value
8	Sulphate (SO ₄)	mg/l	250
9	(BOD) ₅	mg/l	NV
10	(COD) Mn	mg/l	NV
11	Aluminium (Al)	mg/l	0.2
12	Arsenic (As)	mg/l	0.05
13	Copper (Cu)	mg/l	1.0
14	Iron (Fe)	mg/l	0.3
15	Lead (Pb)	mg/l	0.01
16	Manganese (Mn)	mg/l	0.1
17	Mercury (Hg)	mg/l	0.001
18	Zinc (Zn)	mg/l	3.0
19	Total Coliform	MPN/100mlml	0

Annex 5: Odour Impact Assessment Procedures

The odour impact assessment at nearby sensitive receptors will be performed in accordance with the following standard procedures⁶:

- Staff will only undertake the odour impact assessment prior to coming to work as staff are likely to be desensitised to the odour generated onsite, termed odour adaptation, and thus might be unable to objectively assess odour in the surrounding environment.
- Prior to the test, the wind conditions will be confirmed, and an initial odour impact assessment taken upwind of the facility prior to moving to downwind locations.
- The surveyors will record both the intensity of the odour and its persistence at each location assessed using the terminology outlined in the Figure below.
- The surveyors should not smoke, chew gum, drink coffee / tea nor be experiencing a medical condition (such as a cold / flu) which could interfere with the test.
- Surveys will be conducted on at least several occasions over varying days of the week. The time of day when odour complaints are made and the wind direction which leads to most complaints should be considered also.
- Where an odour is detected, an inspection of the facility must be carried out directly by the odour investigator, to determine whether any observed odour can be linked to the site and to evaluate any potential odour producing activities or locations. Understanding the actual process conditions onsite at the time of the complaint will help to locate the issue and isolate the problem.



⁶ Adapted from Environmental Protection Agency (Ireland), Office of Environmental Enforcement, Odour Emissions Guidance Note (Air Guidance Note AG9), September 2019
<https://www.epa.ie/pubs/advice/air/emissions/Odour%20Emissions%20Guidance%20Note%20AG09.pdf>

Annex 6: COVID-19 Monitoring Checklists

1. Prevention Measures

Below is a checklist for prevention measures.

No.	COVID-19 Preventive Measures	Yes	No
1	Dissemination of COVID-19 prevention measures to staff and workers through orientation or distributing leaflet/poster at information/safety board at each construction and camp site		
2	Daily checking temperature of staff and workers prior to start working		
3	Staff and workers are wearing masks all the time		
4	Do not share personal items or supplies such as phones, pens, notebooks, tools, etc.		
5	Avoid common physical greetings, such as handshakes		
6	Maintain a minimum physical distance of one metre from others if possible		
7	Wash hands often with soap and water for at least 20 seconds after using the washroom, before handling food, after blowing nose, coughing, or sneezing, and before smoking. If hands are not visibly soiled, and soap and water are unavailable, alcohol-based hand sanitizer can be used		
8	All offices and jobsites implement additional cleaning measures of common areas. All door handles, railings, ladders, switches, controls, eating surfaces, shared tools and equipment, taps, toilets, and personal workstation areas are wiped down at least twice a day with a disinfectant, such as disinfectant wipes. Individuals are responsible for cleaning and disinfecting their workstations		
9	Commonly touched surfaces on vehicles and equipment are thoroughly cleaned and disinfected at the end of shifts and between users		
10	Coughing or sneezing into a tissue or the bend of your arm, not your hand; dispose of used tissues you have as soon as possible in a lined waste basket and wash your hands afterwards		
11	Complying with any instructions announced by the Ministry of Health		

2. Response to Possible Cases of COVID-19

Below is a checklist on proper response to possible cases of COVID-19 disease.

No.	Measures in case of COVID-19	Yes	No
1	Individuals who have been potentially exposed to the virus, or who are exhibiting flu-like symptoms such as fever, tiredness, coughing, or congestion are instructed to: <ul style="list-style-type: none"> ▪ Not come to work; ▪ Contact their supervisor and/or human resources department; ▪ Stay at home and self-isolate; and 		

	▪ Contact local health authorities for further direction.		
2	Such individuals are required to follow the directions of the local health authority and may not return to work until given approval by the proper health authorities;		
3	Individuals who begin to display flu-like symptoms on site are instructed to avoid touching anything, take extra care to contain coughs and sneezes, and return home immediately to undergo self-isolation as directed by the local health authority;		
4	All areas on site potentially infected by a confirmed or probable case are barricaded to keep individuals two meters away until the area is properly cleaned and disinfected.		

Note: Additional COVID-19-related checklist/form, please go to this link:

<http://www.cdcmoh.gov.kh/resource-documents/covid-19-documents/494-2019-ncov-documents-management>