

Environmental Assessment and Review Framework

Project Number: 51375-001
June 2019

IND: Public-Private Partnership in Madhya Pradesh Road
Sector Project

Prepared by Madhya Pradesh Road Development Corporation Ltd., Government of India for the
Asian Development Bank.

CURRENCY EQUIVALENTS

(As of 28 May 2019)

Currency unit – Indian Rupee (₹)

₹1.00 = \$0.0143937704

\$ 1.00 = ₹69.474500

ABBREVIATIONS

ADB	-	Asian Development Bank
EARF	-	Environmental Assessment and Review Framework
EMP	-	Environmental Management Plan
GRM	-	Grievance Redress Mechanism
MFF	-	Multitranches Financing Facility
MoHUA	-	Ministry of Housing and Urban Affairs
NCRTC	-	National Capital Region Transport Corporation
REA	-	Rapid Environmental Assessment (REA) Checklist
RRTS	-	Regional Rapid Transit System
SPS	-	Safeguard Policy Statement 2009

WEIGHTS AND MEASURES

km = kilometer

m = meter

This environmental assessment and review framework is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature. In preparing any country program or strategy, financing any project, or by making any designation of or reference to a particular territory or geographic area in this document, the Asian Development Bank does not intend to make any judgments as to the legal or other status of any territory or area.

Table of Contents

I. Introduction	1
II. Assessment of Legal Framework and Institutional Capacity	2
1. The National (India) Environmental Laws and Regulations.....	2
2. ADB Safeguards Policy Statement and Requirements	6
3. International And Regional Agreements And Conventions	6
4. Assessment Of Institutional Capacity	7
III. Anticipated Environmental Impacts	7
IV. Environmental Assessment for Non-Sample Subprojects	8
V. Institutional Arrangement and Responsibilities	9
VI. Consultation, Information Disclosure and Grievance Redress Mechanism	13
APPENDICES	16
Appendix 1: Rapid Environmental Assessment (REA) Checklist	17
Appendix 2: Outline of an Initial Environmental Examination Report	20
Appendix 3: Outline of an Annual EMP Monitoring Report	23

I. INTRODUCTION

1. The proposed project is designed to improve transport connectivity in Madhya Pradesh state by rehabilitating and upgrading about 1,600 kilometers (km) of state highways and major district roads (MDRs). It will involve upgrading newly declared state highways and single-lane MDRs to two-lane width. The project will be implemented under the hybrid–annuity model (HAM), which is a form of public-private partnership (PPP). Consulting services will be provided to supervise the implementation of civil works.
2. The project will have the following outputs: (i) 750 km of state highways upgraded to two-lane and all-weather highways; (ii) 850 km of single-lane MDRs upgraded to two-lane and all-weather roads; and (iii) road maintenance and asset management improved. The expected outcome will be improved road transport accessibility and efficiency within Madhya Pradesh.
3. This environmental assessment and review framework (EARF) was formulated to provide guidance on safeguard screening, assessment, institutional arrangements, and processes to be followed for non-sample subprojects that will be prepared and finalized after Board approval. Madhya Pradesh Road Development Corporation (MPRDC) Ltd. is both the executing agency and implementing agency. MPRDC will be responsible in screening and categorization, environmental assessment, and preparation and implementation of the environmental management plan (EMP) and the environmental monitoring plan contained in the initial environmental examinations (IEE) prepared.
4. Since the investment is under a sector loan modality, only identified sample road packages will be prepared prior to loan approval. Subsequent road packages, which will be selected based on predefined criteria, will be prepared by MPRDC.
5. This EARF assesses the requirements of Indian environmental laws and ADB safeguards policy, and describes the procedures that MPRDC will follow to ensure that the project will comply with both. It also provides guidance on various related matters including anticipated impacts of project activities, procedures for stakeholder consultation, information disclosure and grievance redress, accountability mechanism, institutional arrangements and responsibilities, and monitoring and reporting.
6. Eight sample roads with a total length of 298.9 km have been selected under the sector loan for project preparation (Table 1). All roads, including sample and non-sample projects includes construction and performance-based maintenance period. The technical details for the non-sample roads are still being prepared.

Table 1. List of Sample Subprojects

Sl. No.	Civil Package	Road Section	District	Length
1.	Package 6	Satna-Amarpatan Road (SH-13)	Satna	29.8
2.	Package 7	Rewa-Beeda-Semariya road up to Godha Junction (SH-9)	Rewa	41.0
3.	Package 10	Pawai-Mohindra-Semaria Road	Panna	38.0
4.	Package 14	Ashoknagar-Aaron Road (Up to Sindh River)	Ashok Nagar	41.5
5.	Package 16	Aavan Road Maksudangadh to Janjali	Guna	39.4
6.	Package 17	Tamiya – Junnardeo Road	Chhindwara	27.0
7.	Package 19	Maharashtra Border-Kukru-Khamla-Bhaisdehi	Narmadapuram	30.0
8.	Package 23	Baihar-Lamta Road	Sagar	52.2
Total				298.9

Source: Asian Development Bank.

7. The remaining non-sample roads are at different stages of planning and design. The scope will be finalized once the information in the feasibility studies and detailed project reports have been confirmed.

8. This EARF will serve as guide for the Madhya Pradesh Road Development Corporation on the criteria for selection of non-sample subprojects, preparation of IEE reports and assessment and monitoring of safeguards requirements under the ADB Safeguard Policy Statement (SPS) 2009 and national environmental policies as well as Madhya Pradesh State environmental requirements.

II. ASSESSMENT OF LEGAL FRAMEWORK AND INSTITUTIONAL CAPACITY

9. India has a well-defined institutional and legislative framework. The legislation covers all components of environment viz. air, water, soil, terrestrial and aquatic flora and fauna, natural resources, and sensitive habitats. India is also signatory to various international conventions and protocols. The environmental legislations in India are framed to protect the valued environmental components and comply with its commitment to international community under above conventions and protocols. ADB has also defined its Environmental and Social Safeguard policy requirements. This assessment is about the applicability of above laws and regulations, conventions, protocols, and safeguards.

10. The laws, regulations, policies, and guidelines applicable to this project based on the location, design, construction and operation are summarized in the subsequent sections in following order:

- National (India) Environmental Legislation and Legal Administrative Framework,
- ADB Safeguards Policy Statement requirements, and
- Summary of international treaties and applicability to the project.

1. The National (India) Environmental Laws and Regulations

11. The Government of India's environmental legal framework comprises a set of comprehensive acts and regulations aimed at conserving various components of the biological and physical environment including environmental assessment procedures and requirements for public consultation. The policies and requirements which are most relevant in the context of this project are provided in Table 2.

Table 2: Summary of Relevant Environmental Legislation

Act	Objective	Responsible Institution
National Regulations		
Environment (Protection) Act (1986) and Rules (1986)	To protect and improve the overall environment	Ministry of Environment, Forest and Climate Change
Environmental Impact Assessment (EIA) Notification under Environmental Protection Rules (2006, 2009, 2011) and relevant Office Memorandums (OM)	To provide guidance on environmental clearance requirements and clarification on related specific technical issues	Ministry of Environment, Forest and Climate Change

Act	Objective	Responsible Institution
The Wildlife Protection Act (1972 and amended in 1993)	To protect wild animals and birds through the creation of National Parks and Sanctuaries	Ministry of Environment, Forest and Climate Change
The Water (Prevention and Control of Pollution) Act 1972 (Amended 1988) and Rules 1974	To provide for the prevention and control of water pollution and the maintaining or restoring of wholesomeness of water	Central Pollution Control Board
The Air (Prevention and Control of Pollution) Act, 1981(Amended 1987) and Rules 1982	To provide for the prevention, control and abatement of air pollution, and for the establishment of Boards to carry out these purposes	Central Pollution Control Board and Road Authorities
Hazardous and Other Wastes [Management and Transboundary Movement) Amendment Rules, 2016	Supersedes Hazardous Waste (Management, Handling and Transboundary Movement) Rules 2008	Central Pollution Control Board
Construction and Demolition Waste Management Rules, 2016	Details the duties of waste generators, service providers and contractors, as well as the state government and authorities	Central Pollution Control Board
Solid Waste Management Rules, 2016	Mandates the recovery, reuse and recycling of solid wastes. Details duties of waste generators, manufacturers, different ministries, and CPCB.	Central Pollution Control Board
The Forest (Conservation) Act 1980 (Amended 1988) and Rules 1981 (Amended 2003)	To protect and manage forests	Ministry of Environment, Forest and Climate Change
Ancient Monuments and Archaeological Sites and Remains Act (1958)	Conservation of Cultural and historical remains found in India.	Archaeological Department, Government of India
Building and Other Construction Workers (Regulations of Employment and Conditions of Service) Act, 1996	To regulate the employment and conditions of service of building and other construction workers and to provide for their safety, health and welfare measures	Ministry of Labour and Employment
Child Labour (Prohibition and Regulation) Act, 1986	To regulate the employment of children including age limits, type of employment, timing of work, information disclosure and health and safety.	Ministry of Labour and Employment
State Regulations		
Air (Prevention and Control of Pollution) Madhya Pradesh Rules, 1983	Empowering the Board or any authorized officer to take air emission samples from pollution sources	Madhya Pradesh State Pollution Control Board
Water (Prevention and Control of Pollution) Madhya Pradesh Rules, 1975)	Requirements to obtain the Consent of the State Board for establishing or taking any steps to establish any industry, operation, or process or	Madhya Pradesh State Pollution Control Board

Act	Objective	Responsible Institution
	any treatment and disposal system from discharge, sewage or effluent into a stream, well, sewer or land.	

12. Some of the relevant national policies applicable to the proposed project include:
- National Conservation Strategy and Policy Statement on Environment and Development of 1992
 - National Environment Policy of 2006
 - Policy Statement for Abatement of Pollution of 1992
 - National Forest Policy of 1998
 - National Policy of Resettlement and Rehabilitation (R&R) of 2007
13. The required clearances/permissions related to environment, social, and forests have been summarized in Table 3.

Table 3: Applicable Permits and Clearances Required for the Project

Sl. No.	Permissions/Clearances	Acts/Rules/Notifications/Guidelines	Concerned Agency	Responsibility
A. Pre-construction Stage				
1.	Permission for felling of trees / NOC from Forest Department	Tree Protection Act, 1976	District Forest Office/State Forest Department for trees felling in forest areas and District Authorities in non-forests Areas	Madhya Pradesh Road Development Corporation
2.	NOC from Forest Department	The Forest (Conservation) Act 1980 (Amended 1988) and Rules 1981 (Amended 2003)	State Forest Department	Madhya Pradesh Road Development Corporation
B. Implementation Stage				
1.	Consent to Establish and Operate for hot mix plants, quarrying and crushers, and batch mixing plants	Air (Prevention and Control of Pollution) Act 1981	Madhya Pradesh State Pollution Control Board	Contractor
2.	Permission for withdrawal of groundwater	Environment (Protection) Act, 1986	Central Ground Water Authority	Contractor
3.	Permission for sand mining from river bed	Environment (Protection) Act, 1986	Mining Department/ Ministry of Environment, Forest and Climate Change	Contractor

Sl. No.	Permissions/ Clearances	Acts/Rules/Notifications/ Guidelines	Concerned Agency	Responsibility
4.	Authorization for disposal of hazardous waste including bituminous waste	Hazardous Waste (Management and Handling) Rules 1989	Madhya Pradesh State Pollution Control Board	Contractor
6.	Consent for disposal of sewage from construction camps	Water (Prevention and Control of Pollution) Act 1974	Madhya Pradesh State Pollution Control Board	Contractor
7.	Pollution Under Control Certificate	Central Motor and Vehicle Act, 1988	Department of Transport, Govt. of Madhya Pradesh authorized testing centers	Contractor
8.	Employing labour/ workers	The Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act, 1996	District Labour Commissioner	Contractor
9.	Environmental Clearance / permit for borrow areas and quarries	EIA Notification 2006 (amended 2009, 2011, and 2013)	Designated District/State/ Central Government agency	Contractor

14. Under EIA Notification 2006 (amended 2009, 2011, and 2013), all new state highways or expansion of existing state highways in hilly terrain above 1000 m above mean sea level (amsl) and/or ecologically sensitive areas require environmental clearance. In addition, any state highway project will be treated as category A if it is located in whole or in part within 5 km from the boundary of:

- (i) Protected Areas notified under the Wildlife (Protection) Act, 1972;
- (ii) Critically Polluted areas as notified by the Central Pollution Control Board From time to time;
- (iii) Notified eco-sensitive areas; and
- (iv) Five kilometers from interstate boundaries and international boundaries.

15. As per the Forest Conservation Rules (1981, amended 2003), a forestry clearance from Department of Forests is required for diversion of forest land for non-forest purpose. The executing agency prepares the proposal for diversion of forest land for non-forest purpose and submit it to the State Government. Once the State Government is satisfied with the proposal, sends the proposal with specific comments and justifications to the Central Government. Proposals involving diversion of up to 40 hectares of forest land are sent to the concerned regional office of the Ministry of Environment, Forest and Climate Change (MOEFCC) by the State Government. Proposals involving diversion of forest land in excess of 40 hectares are sent by the State Government to the Secretary to the Government of India, MOEFCC. Prior approval of the Central Government is given in two stages. First stage is the in-principle agreement related to compensatory afforestation, and funds for raising compensatory afforestation. Second stage is the formal approval process by MOEFCC.

2. ADB Safeguards Policy Statement and Requirements

16. The Asian Development Bank has defined its safeguard requirements under its Safeguard Policy Statement (SPS) 2009. The prime objectives of safeguard policy are to: (i) avoid adverse impacts of projects on the environment and affected people, where possible; and (ii) minimize, mitigate, and/or compensate for adverse project impacts on the environment and affected people when avoidance is not possible. This policy requires assessment, mitigation and commitment towards environmental protection. The extent of assessment depends on the category of the project. ADB's SPS 2009 classify a project depending on following three categories:

- **Category A:** A proposed project is classified as category A if it is likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the sites or facilities subject to physical works. An environmental impact assessment is required.
- **Category B:** A proposed project is classified as category B if its potential adverse environmental impacts are less adverse than those of category A projects. These impacts are site-specific, none or very few of them are irreversible, and in most cases mitigation measures can be designed more readily than for category A projects. An initial environmental examination is required.
- **Category C:** A proposed project is classified as category C if it is likely to have minimal or no adverse environmental impacts. No environmental assessment is required although environmental implications need to be reviewed.

17. **Category of the Project as per SPS.** The project has been evaluated considering the outcome of latest ADB's Rapid Environmental Assessment Checklist (Appendix 1). The project has been categorized as "B" for environment since the proposed upgrading of state highways and major district roads will not traverse any environmentally sensitive habitats. These roads are already existing.

3. International and Regional Agreements and Conventions

18. India is a party and signatory to several international and regional environmental agreements to which the MoEFCC is the National Focal Point. Key international agreements that India is signatory to and relevant for the project are provided below:

- Convention Relative to the conservation of Flora and Fauna in their Natural State (1933)
- International Plant Protection Convention (1951)
- Convention on Wetlands of International Importance, Especially as Waterfowl Habitat (Ramsar, 1971)
- Convention concerning the Protection of the World Cultural and Natural Heritage (Paris, 1972)
- Convention in International Trade in Endangered Species of Wild Fauna and Flora (Washington, 1973)
- Convention on Migratory Species of Wild Animals (Bonn, 1979)
- Convention on the Prior Informed Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (PIC or Rotterdam, 1990)
- United Nations Framework Convention on Climate Change (Rio De Janeiro, 1992)
- Convention on Biological Diversity (Rio De Janeiro, 1992)
- Protocol to the United Nations Convention on Climate Change (Kyoto, 1997)

19. The interventions proposed under the project shall be implemented in compliance with applicable international and regional conventions and declarations to which India is a party.

4. Assessment of Institutional Capacity

20. MPRDC has implemented three ADB projects in the past and currently implementing two ADB-funded projects. The proposed project is the sixth to be implemented with ADB funds. MPRDC has established Environment and Social Cell (ESC) in the past. At the subproject level, each project implementation unit (PIU) to be established will have one focal person to manage both the environment and social safeguards.

21. The ESC at MPRDC level and safeguards focal person at the PIU level will be supported by an environmental specialist under the construction supervision consultant (CSC) for regular monitoring and reporting on EMP implementation. An initial coordination cum training workshop will be carried out by ADB and/or MPRDC and/or the CSC environmental specialist during the pre-construction stage to agree on delineation of responsibilities and reporting requirements for each party. Further training will be conducted by the CSC during construction stages as necessary.

III. ANTICIPATED ENVIRONMENTAL IMPACTS

22. It is anticipated that the proposed upgrading of state highways and major district roads into all-weather two-lane roads, will be categorized as “B” for environment, based on SPS guidelines. Environmental impacts arising from road rehabilitation of existing roads are project specific and can be easily mitigated. Some of the activities that will result in direct, indirect, and cumulative impacts include improvement works for the road sections, cutting of hill slope, filling, cutting of trees, stone quarrying, and construction of structures.

23. The improved road will increase the level of economic activities as well as the development of project areas; better connectivity that will result in reduction in travel time; better mode and frequency of transport; access to health care facilities, educational and other services; and boost income of the local economy through improved access to tourism infrastructure. The improved road will also result to better investment climate that will provide more employment opportunities for the people.

24. Based on the eight sample subprojects, potential impacts, which can be direct, indirect or cumulative will arise during construction phase. Some of these negative impacts include: (i) erosion and modification of borrow area; (ii) loss of topsoil in borrow area; (iii) sedimentation of water bodies near the road; (iv) potential contamination of water table from equipment lubricant, fuels and detergents used in labor camps; (v) generation of construction and demolition wastes; (vi) generation of domestic wastes from the workers; (vii) potential encroachment on Forest Department lands; (viii) disturbance of fauna; (ix) disturbance of community living beside the road; (x) increased level of air pollution and noise; and (xi) potential health and safety impacts to workers and affected people (AP) due to increased speed and road bend. Positive impacts include: (i) enhanced connectivity within the state through all-weather roads in Madhya Pradesh; (ii) improved access to trade, education and medical facilities; and (iii) creation of jobs during construction phase.

25. With regard to securing clearance from the Forest Department, No Objection Certificates (NOC) are being secured by MPRDC. MPRDC assured ADB that construction work will only be

carried out within the available road right of way and will in no way encroach private and public lands. For sections that need to be modified, engineering solutions will be implemented to address safety issue.

26. The CO₂ emissions of the project was estimated at below the 100,000 tons per annum, the significance threshold set in SPS 2009.

27. The anticipated negative environmental impacts will be addressed by implementing mitigation measures. Most of these measures will be implemented during construction phase. These include: erosion stabilization measures, proper solid waste management in labor camps, installation of appropriate sanitation facilities as well as oil and water separator, water spraying on dusts and maintenance of equipment to address elevated level of air pollution, reforestation and afforestation to compensate for cut trees, and training and provision of personal protective equipment for workers. The safety of the community will also be protected through installation of warning signs near construction sites to prevent disturbance of the community.

28. To address the negative impacts, mitigation measures will be proposed in the Environmental Management Plan, which will also include the activities to be undertaken for each phase of the project, the responsible persons or institutions that will implement and supervise the mitigating measures, the timeline to implement the mitigating measures, and the budget allocation to address the impacts. Subproject-specific EMP should be prepared as part of IEE preparation. The effectiveness of the EMP will be monitored through an environmental monitoring plan. Further institutional mechanisms will be established between the executing agency, CSCs, contractors, and other concerned agencies to ensure all unanticipated environmental impacts are appropriately addressed.

IV. ENVIRONMENTAL ASSESSMENT FOR NON-SAMPLE SUBPROJECTS

29. **Screening and classification.** No category A subprojects located near environmentally sensitive areas or involving long term irreversible environmental impacts will be included in the list of subprojects to be approved. The environmental assessment of non-sample subprojects will follow the EARF guidelines as well as Safeguards Requirements 1 of the SPS. ADB will ensure that the EARF requirements will be followed upon submission of IEE reports.

30. MPRDC will propose the categorization of non-sample subprojects by filling up project specific information in the Rapid Environmental Assessment (REA) Checklist (Appendix 1). It is expected that only category B subproject will be proposed for categorization and that no category A subproject will be considered. ADB will confirm the categorization indicated in the checklist with MPRDC.

31. The following criteria shall be followed for subproject roads:

- (i) Only the existing roads under MPRDC's jurisdiction will be considered.
- (ii) New subproject roads will not be considered;
- (iii) Category A subprojects will not be considered;
- (iv) Subproject roads that are within a legally protected area or critical habitat area or will have direct impacts on cultural heritage sites will not be included.

32. **Environmental assessment.** Since category A subproject roads will not be considered, only IEE reports will be prepared. The report will follow the outline of Safeguards Requirements

1 of SPS (Appendix 2). The IEE report will be submitted to ADB for review and approval. The report will be disclosed in the ADB website prior to subproject approval.

33. A total of two IEE reports have been prepared for the eight sample subprojects. For the non-sample subprojects, one consolidated IEE report with subproject specific EMPs will be prepared for roads under each detailed project report Consultant Package or similar geographical settings.

34. The IEE shall follow the requirements of ADB's SPS. The study shall detail the subproject scope, the baseline environmental conditions in the covered subproject area, the legal framework applicable to the project, the activities that will generate potential impacts, the anticipated potential impacts, the environmental management plan to address the environmental impacts, the institutional arrangement to implement EMP and environmental monitoring plan, the grievance redress mechanism to address complaints and concerns about the project, and the disclosure policy to be implemented.

V. INSTITUTIONAL ARRANGEMENT AND RESPONSIBILITIES

35. The executing agency for the project will be the Government of Madhya Pradesh (GOMP) through Madhya Pradesh Road Development Corporation (MPRDC), which was set-up pursuant to a loan and technical assistance from ADB.¹ MPRDC, which is the implementing agency for multilateral loans and has evolved into an empowered institution to manage both state highways and major district roads (MDRs) through innovative PPP schemes, will also be the implementing agency for this project.

36. The implementation arrangements will follow the ongoing ADB loans for state highways and MDRs with the following improvements: (i) expansion of the Environmental and Social Cell (ESC) staff from 4 to 6 with the recruitment of one gender expert and one environmental safeguard officer; (ii) MPRDC's 12 division offices acting as PIUs will appoint a social and environment safeguards focal person; and (iii) environmental specialist from the CSC will provide technical support to MPRDC and PIUs for the implementation of environment safeguards.

37. A Chief Engineer at MPRDC headquarter will be designated as person-in-charge for project implementation. The ESC will ensure the compliance of the project with all the requisite environmental and social safeguards. The Chief General Manager will lead the ESC, and will be supported by three environment experts, two social safeguards experts and one gender expert to support the management of environment and social safeguards of roads under the project.

38. Twelve division offices in MPRDC—Bhopal, Jabalpur, Sagar, Gwalior, Ujjain, Indore, Rewa, Narmadapuram, Chambal, Shahdol, Chhindwara, and Dhar—act as PIUs. Each PIU is headed by a Divisional Manager (Tech.) who is responsible for project level implementation. Each PIU will manage one or more contracts under its jurisdiction. One project manager will be assigned for each contract package.

39. MPRDC will engage CSC to act as the authority engineer for the construction contracts. Environment and social safeguards experts from the CSC will provide technical support to

¹ ADB. [India: Madhya Pradesh State Roads Sector Development Program \(Project Loan\)](#) (Loan 1959); and ADB. [India: Institutional Strengthening and Capacity Building for Madhya Pradesh State Road Sector](#) (TA 4013). MPRDC was formed as a result of the TA.

MPRDC and the PIUs for the implementation of environment and social safeguards under the project.

40. The detailed responsibilities of MPRDC, PIUs, CSC, contractor and ADB are detailed in the succeeding sections:

A. Madhya Pradesh Road Development Corporation

- (i) Ensure compliance of project with ADB's Safeguard Policy Statement and the laws and regulations of Government of India;
- (ii) Ensure the project's compliance with the environmental assessment and review framework;
- (iii) Prepare the Rapid Environmental Assessment (REA) screening checklist (Appendix 1) and send the filled-up form to ADB for review and confirmation of the category of the project;
- (iv) Upon ADB's confirmation of the environmental categorization of subprojects, prepare the terms of references (TORs) for the consultants to conduct IEE studies in compliance with ADB's SPS;
- (v) Ensure meaningful consultation with affected people and other stakeholders, as required under SPS;
- (vi) Review the draft IEE reports to conform with the Government of India's environment regulations and ADB's SPS;
- (vii) Ensure the appropriation of budgetary needs for environmental safeguards;
- (viii) Obtain the necessary environment safeguard related clearances or permits from relevant government institutions;
- (ix) Ensure securing all regulatory clearances before commencing any subproject civil works;
- (x) Submit to ADB the final IEE report with consent letter agreeing to disclose the report in ADB website;
- (xi) Ensure that the ADB approved environmental management plan (EMP) forms part of bidding documents;
- (xii) Provide contractors with access to the IEE report, including the EMP;
- (xiii) Ensure that contractors have access to the IEE report including EMP of the subprojects;
- (xiv) Organize training and awareness programs on implementation of environment safeguards for relevant staff of MPRDC, PIU, CSC and contractors;
- (xv) Ensure that contractors understand their responsibilities to mitigate environmental problems associated with their construction activities;
- (xvi) Ensure and monitor that the EMP including Environmental Monitoring Plan will be properly implemented;
- (xvii) In case of unanticipated environmental impacts during project implementation stage arrange to prepare and implement an updated EMP to account for such impacts after seeking concurrence from ADB. The updating shall be carried out after due consultation with stakeholders;
- (xviii) In case during project implementation a subproject needs to be realigned, review the environmental classification and revise accordingly, and identify whether supplementary IEE study is required. If it is required, prepare the TOR for undertaking supplementary IEE and hire an environment consultant to carry out the study;
- (xix) Ensure that construction workers work under safe and healthy working environment in accordance with the World Bank EHS guidelines relating to occupational health and safety;

- (xx) Ensure effective implementation of Grievance Redress Mechanism to address affected people's concerns and complaints, promptly, using understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the affected people;
- (xxi) Submit annual monitoring reports for all sub-projects on the implementation of EMPs to ADB for disclosure on the ADB website. The suggested outline of the monitoring report is provided in Appendix 3;
- (xxii) Ensure proper implementation of corrective action plan if identified in the monitoring report; and
- (xxiii) Disclose information as defined in this EARF.

B. Project Implementation Unit:

- (i) Ensure that Project complies with ADB's SPS and Government of India's laws and regulations;
- (ii) Ensure that the project complies with all environment safeguard requirements as given in this EARF;
- (iii) Obtain necessary consents or permissions (e.g. forest clearance, no objection certificate) from relevant Government Agencies. Also ensure that all necessary regulatory clearances will be obtained prior to commencing any civil work of the subproject;
- (iv) Ensure that contractors have access to the IEE report including EMP of the subprojects;
- (v) Ensure that contractors understand their responsibilities to mitigate environmental problems associated with their construction activities;
- (vi) Participate in training and awareness programs on implementation of environment safeguards and organize further on the job or subject specific training for the contractor during project implementation as necessary with the support of the CSC environmental specialist;
- (vii) Conduct regular onsite monitoring to ensure proper implementation of the EMP including Environmental Monitoring Plan;
- (viii) Verify and approve monitoring checklists and/or reports that will be prepared and submitted by the CSC;
- (ix) In case of unanticipated environmental impacts during project implementation stage, identify the need to prepare and implement an updated EMP to account for such impacts after seeking concurrence from ADB;
- (x) Ensure that construction workers work under safe and healthy working environment in accordance with the World Bank EHS guidelines relating to occupational health and safety;
- (xi) Ensure effective implementation of Grievance Redress Mechanism to address affected people's concerns and complaints, promptly, using an understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the affected people;
- (xii) Ensure timely submission of annual monitoring reports for all sub-projects on the implementation of EMPs to MPRDC for further submission to ADB for disclosure on the ADB website; and
- (xiii) Ensure proper implementation of corrective action plan if identified in the monitoring report.

C. Construction Supervision Consultant:

- (i) Ensure that Project complies with ADB's SPS and Government of India's laws and regulations;

- (ii) Ensure that the project complies with all environment safeguard requirements as given in this EARF;
- (iii) Provide necessary technical advice and support to the PIU and/or contractor to obtain consents or permissions (e.g. forest clearance, no objection certificate) from relevant Government Agencies. Also ensure that all necessary regulatory clearances will be obtained prior to commencing any civil work of the subproject;
- (iv) Ensure that contractors have access to the IEE report including EMP of the subprojects;
- (v) Update IEE and EMP reports in case of any changes in the design or modification in the alignment.
- (vi) Prepare IEE's and subproject specific EMP's for the non-sample subprojects that will be identified and finalized after project approval
- (vii) Ensure that contractors understand their responsibilities to mitigate environmental problems associated with their construction activities;
- (viii) Closely coordinate and communicate with the contractor to facilitate implementation of all mitigation measures identified in EMP;
- (ix) Conduct training and awareness programs on implementation of environment safeguards for MPRDC, PIU and the contractors during the pre-construction stage and further organize on the job or subject specific training for the contractor during project implementation as necessary;
- (x) Conduct regular on-site monitoring to ensure proper implementation of the EMP including Environmental Monitoring Plan;
- (xi) Prepare monitoring checklists and/or reports based on the site monitoring and submit them to the PIU for approval;
- (xii) In case of unanticipated environmental impacts during project implementation stage, upon the advice from the PIU and/or MPRDC prepare an updated EMP to account for such impacts after seeking concurrence from ADB;
- (xiii) Ensure that construction workers work under safe and healthy working environment;
- (xiv) Facilitate effective implementation of the Grievance Redress Mechanism to address affected people's concerns and complaints, promptly, using an understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the affected people; and
- (xv) Prepare annual monitoring reports for all sub-projects on the implementation of EMPs for submission to PIU and MPRDC and further submission to ADB for disclosure on the ADB website.

D. Contractors:

- (i) Ensure that adequate budget provisions are made for implementing all mitigation measures specified in the EMP;
- (ii) Participate in training and awareness programs on implementation of environment safeguards;
- (iii) Identify further needs for conduction of on the job or subject specific training during project implementation by the CSC or MPRDC or PIU;
- (iv) Obtain necessary environmental permission etc. from relevant agencies as specified by EARF for project road works, borrow areas and quarries, hot-mix plant etc. prior to commencement of civil works contracts;
- (v) Implement all mitigation measures as given in the EMP in the contract documents;
- (vi) Ensure that all workers, site agents, including site supervisors and management participate in training sessions organized by the PIU, MPRDC or CSC;

- (vii) Ensure compliance with environmental statutory requirements and contractual obligations;
- (viii) Respond promptly to grievances raised by the local community or any stakeholder and implement environmental corrective actions or additional environmental mitigation measures as necessary, and
- (ix) Based on the results of EMP monitoring, cooperate with the PIU and CSC to implement environmental corrective actions and corrective action plans, as necessary.

E. Asian Development Bank:

- (i) Review REA checklist and endorse or modify the project classification proposed by the MPRDC;
- (ii) Review IEE reports, including this environmental assessment and review framework, and disclose draft and final reports through ADB's website as required;
- (iii) Issue subproject's approval based on the respective IEE reports;
- (iv) Monitor implementation of environment safeguard requirements under the project through due diligence missions;
- (v) Provide assistance to MPRDC, if required, in carrying out its responsibilities for implementing environment safeguards and for building capacity for safeguard compliance;
- (vi) Review and approve annual environmental monitoring reports submitted by MPRDC and disclose them on the ADB website; and
- (vii) Monitor MPRDC's commitments under EARF.

VI. CONSULTATION, INFORMATION DISCLOSURE AND GRIEVANCE REDRESS MECHANISM

41. **Consultation.** With the help of non-government and community-based organizations, meaningful consultations for non-sample subprojects will be held to build on the previous consultations and community participation exercises undertaken during the detailed project reports preparation. Consultation must start early and should be undertaken in an atmosphere free of intimidation or coercion. The consultation should likewise consider the participation of women and disadvantaged and vulnerable groups. At least one consultation will be conducted, when the draft IEE has been prepared, with the aim of informing stakeholders about the project, its potential impacts and likely mitigation. Additional consultations will be held with particular groups or individuals depending on the assessment of MPRDC or ADB. The consultation process and its outcome will be documented in the IEE report, which will explain how relevant comments from stakeholders were addressed in project design and will give a justification for any comments not acted upon.

42. **Information Disclosure.** Relevant documents will be disclosed to the public following ADB requirements. The final IEE report will be posted on MPRDC (<http://mprdc.gov.in/>) and ADB websites (<https://www.adb.org/>), and hard copies will be made available at the MPRDC headquarter and division offices. Any substantial revision to the IEE will be subject to ADB review and will be disclosed after ADB's satisfactory review. Environmental monitoring reports will also be disclosed on ADB website after ADB's satisfactory review.

43. **Grievance Redress Mechanism (GRM).** GRM aims to provide a time-bound and transparent mechanism to resolve social and environmental concerns related to the project, but

is not in any way intended to bypass government's own mechanism to redress complaints and grievances from affected parties.

44. MPRDC will implement the grievance redress mechanism as detailed in Figure 1. A Grievance Redress Committee (GRCs) will be established at the MPRDC state level and at the PIU level to address environment related concerns of affected people. The GRCs are expected to resolve grievances of the eligible persons within a stipulated time of three weeks at the PIU level and three weeks at the state level.

45. The state level GRC will comprise of the:

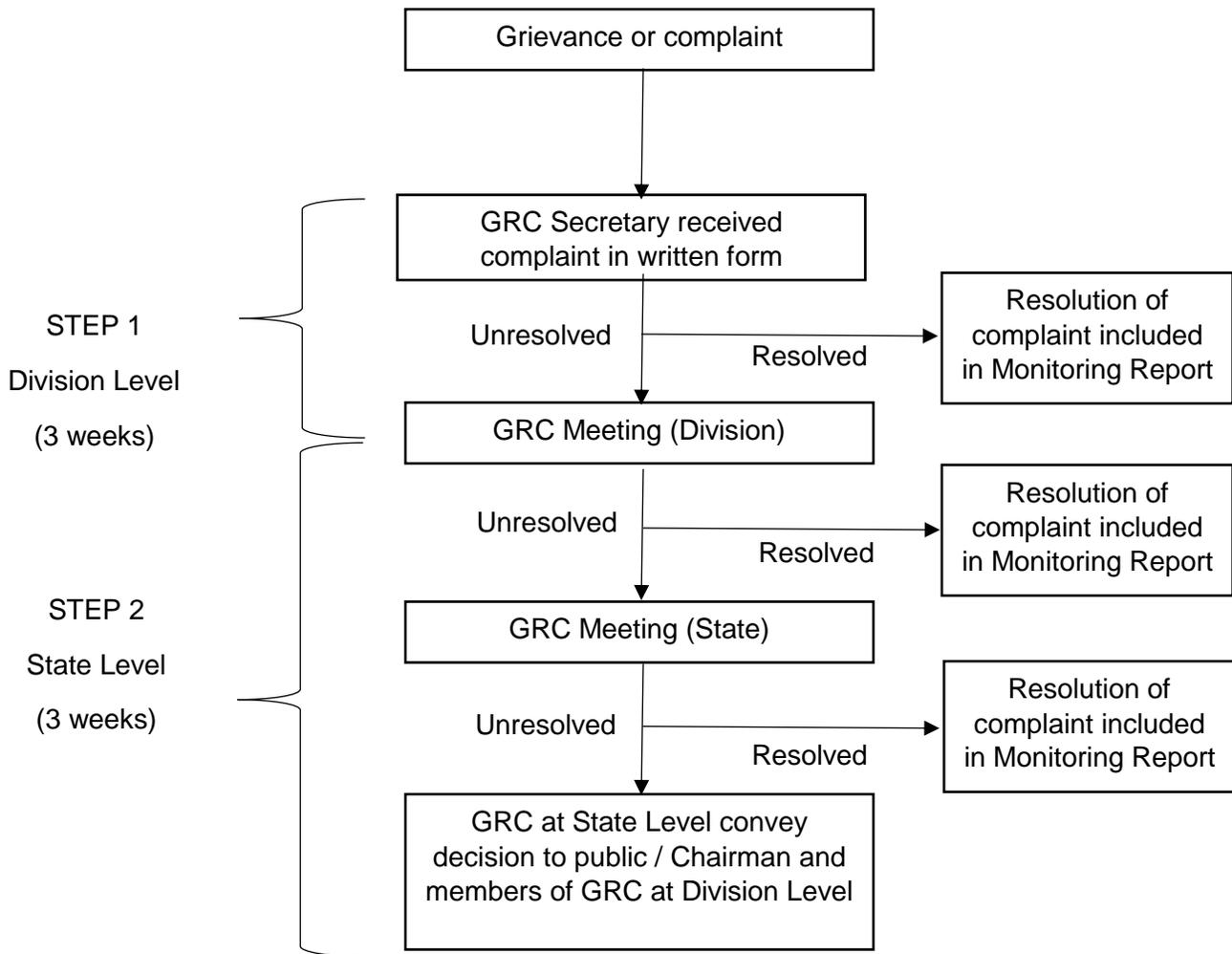
- (i) General Manager, MPRDC, Bhopal
- (ii) Superintended Engineer, PWD, Bhopal
- (iii) DGM, MPRDC, Bhopal
- (iv) Manager (Environment & Social), MPRDC, Bhopal
- (v) A representative from IP community or NGO for environmental related issue affecting IP

46. The PIU level GRC will comprise of the:

- (i) Divisional Manager from MPRDC
- (ii) Executive Engineer, local PWD office
- (iii) A representative from local NGOs or a local person of repute and standing in the society, elected representative from Zila Parisad /District Council.
- (iv) A representative for women from a relevant agency which could be from government, or NGO or local community
- (v) A representative from IP community or NGO for environmental related issue affecting IP
- (vi) Environment Expert from Independent Engineer

47. Individuals or groups with legitimate grievances can file their complaint with the GRM Secretary at the division level. If the complaint has been addressed at the division level, the resolution will be recorded and included in the monitoring report to be submitted to ADB. If the problem was not resolved, then the GRC committee at the division level will meet to resolve the issue. If there is resolution of the issue, then it will be again recorded and included in the monitoring report to be submitted to ADB. Otherwise, the complaint will be elevated to the state level. All complaints at the division level must be resolved or elevated to the state level within three weeks. The GRC at the state level likewise needs to resolve the complaint within three weeks. In addition, affected parties may file their grievances to the relevant legal authority at any time.

Figure 1. Grievance Redress Mechanism



VII. ENVIRONMENTAL MONITORING AND REPORTING

48. Monitoring is a vital tool in project implementation as it establishes the baseline environmental conditions, predicts environmental quality trends, and confirms if environmental goals are being met by the project. To ensure the effective implementation of mitigation measures and environmental management plan during construction and operation phases of the project, it is essential that an effective Environmental Monitoring Plan (EMP) be designed and followed.

49. The broad objectives of environmental monitoring include: (i) evaluate the effectiveness of mitigation measures proposed in the EMP; (ii) propose further improvements in the environmental management plan based on new issues encountered during monitoring; (iii) improve environmental quality through implementation of mitigation measures indicated in the EMP; (iv) meet the environmental safeguard requirements of both national regulatory framework as well as ADB SPS 2009.

50. Contract documents will include subproject-specific EMP. The EMP details the specific activities for each phase of the subproject (pre-construction, construction, and operation), predicted impacts that will be generated, recommended mitigating and enhancement measures, supervision and monitoring responsibilities, and the timeline and budget to implement the plan. The environmental monitoring plan (EMoP) will be used to monitor various environmental quality parameters and to verify the effectiveness of EMP implementation. The EMoP consists of monitoring the quality of air, water and noise through onsite monitoring or laboratory tests. The EMoP also monitors the physical environment of subprojects such as soil erosion, cutting and planting of vegetation, and disposal of solid wastes. It also monitors impacts on occupational and community health and safety. Air, water, and noise quality testing will be done by independent laboratories outsourced by the contractor. Physical monitoring activities, on the other hand will be done by the CSC. MPRDC will be responsible for vegetation planting and maintenance by either including the activities in construction activities, or through government agencies responsible for tree plantation and maintenance.

51. The reporting system will emanate starting from the contractor reporting to the CSC, who in turn shall report to the PIU and to MPRDC. MPRDC will then further submit environmental monitoring reports for all subprojects to ADB. The compliance monitoring report will be disclosed on ADB website on an annual basis during the implementation period.

APPENDICES

APPENDIX 1: RAPID ENVIRONMENTAL ASSESSMENT (REA) CHECKLIST

Instructions:

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

Country/Project Title:

Sector Division:

Screening Questions	Yes	No	Remarks
A. PROJECT SITING			
IS THE PROJECT AREA ADJACENT TO OR WITHIN ANY OF THE FOLLOWING ENVIRONMENTALLY SENSITIVE AREAS?			
▪ CULTURAL HERITAGE SITE			
▪ PROTECTED AREA			
▪ WETLAND			
▪ MANGROVE			
▪ ESTUARINE			
▪ BUFFER ZONE OF PROTECTED AREA			
▪ SPECIAL AREA FOR PROTECTING BIODIVERSITY			
B. POTENTIAL ENVIRONMENTAL IMPACTS			
WILL THE PROJECT CAUSE...			
▪ encroachment on historical/cultural areas; disfiguration of landscape by road embankments, cuts, fills, and quarries?			
▪ encroachment on precious ecology (e.g. sensitive or protected areas)?			
▪ alteration of surface water hydrology of waterways crossed by roads, resulting in increased sediment in streams affected by increased soil erosion at construction site?			
▪ deterioration of surface water quality due to silt runoff and sanitary wastes from worker-based camps and chemicals used in construction?			

Screening Questions	Yes	No	Remarks
<ul style="list-style-type: none"> ▪ increased local air pollution due to rock crushing, cutting and filling works, and chemicals from asphalt processing? 			
<ul style="list-style-type: none"> ▪ risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during project construction and operation during project construction and operation? 			
<ul style="list-style-type: none"> ▪ noise and vibration due to blasting and other civil works? 			
<ul style="list-style-type: none"> ▪ dislocation or involuntary resettlement of people? 			
<ul style="list-style-type: none"> ▪ dislocation and compulsory resettlement of people living in right-of-way? 			
<ul style="list-style-type: none"> ▪ disproportionate impacts on the poor, women and children, Indigenous Peoples or other vulnerable groups? 			
<ul style="list-style-type: none"> ▪ other social concerns relating to inconveniences in living conditions in the project areas that may trigger cases of upper respiratory problems and stress? 			
<ul style="list-style-type: none"> ▪ hazardous driving conditions where construction interferes with pre-existing roads? 			
<ul style="list-style-type: none"> ▪ poor sanitation and solid waste disposal in construction camps and work sites, and possible transmission of communicable diseases (such as STI's and HIV/AIDS) from workers to local populations? 			
<ul style="list-style-type: none"> ▪ creation of temporary breeding habitats for diseases such as those transmitted by mosquitoes and rodents? 			
<ul style="list-style-type: none"> ▪ accident risks associated with increased vehicular traffic, leading to accidental spills of toxic materials? 			
<ul style="list-style-type: none"> ▪ increased noise and air pollution resulting from traffic volume? 			
<ul style="list-style-type: none"> ▪ increased risk of water pollution from oil, grease and fuel spills, and other materials from vehicles using the road? 			
<ul style="list-style-type: none"> ▪ social conflicts if workers from other regions or countries are hired? 			
<ul style="list-style-type: none"> ▪ large population influx during project construction and operation that causes increased burden on social infrastructure and services (such as water supply and sanitation systems)? 			
<ul style="list-style-type: none"> ▪ risks to community health and safety due to the transport, storage, and use and/or disposal of materials such as explosives, fuel and other chemicals during construction and operation? 			
<ul style="list-style-type: none"> ▪ community safety risks due to both accidental and natural causes, especially where the structural elements or components of the project are accessible to members of the affected community or where their failure could result in injury to the community throughout project construction, operation and decommissioning. 			

A Checklist for Preliminary Climate Risk Screening

Country/Project Title: _____

Sector: _____

Subsector: _____

Division/Department: _____

Screening Questions		Score	Remarks ²
Location and Design of project	Is siting and/or routing of the project (or its components) likely to be affected by climate conditions including extreme weather-related events such as floods, droughts, storms, landslides?		
	Would the project design (e.g. the clearance for bridges) need to consider any hydro-meteorological parameters (e.g., sea-level, peak river flow, reliable water level, peak wind speed etc.)?		
Materials and Maintenance	Would weather, current and likely future climate conditions (e.g. prevailing humidity level, temperature contrast between hot summer days and cold winter days, exposure to wind and humidity hydro-meteorological parameters likely affect the selection of project inputs over the life of project outputs (e.g. construction material)?		
	Would weather, current and likely future climate conditions, and related extreme events likely affect the maintenance (scheduling and cost) of project output(s)?		
Performance of project outputs	Would weather/climate conditions, and related extreme events likely affect the performance (e.g. annual power production) of project output(s) (e.g. hydro-power generation facilities) throughout their design life time?		

Options for answers and corresponding score are provided below:

Response	Score
Not Likely	0
Likely	1
Very Likely	2

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

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

Other Comments: _____

Prepared by: _____

² If possible, provide details on the sensitivity of project components to climate conditions, such as how climate parameters are considered in design standards for infrastructure components, how changes in key climate parameters and sea level might affect the siting/routing of project, the selection of construction material and/or scheduling, performances and/or the maintenance cost/scheduling of project outputs.

APPENDIX 2: OUTLINE OF AN INITIAL ENVIRONMENTAL EXAMINATION REPORT

1. An initial environmental examination (IEE) report is required for all environment category B projects. Its level of detail and comprehensiveness is commensurate with the significance of potential environmental impacts and risks.

2. A typical IEE report contains many of the same major elements as an EIA, but may have a narrower scope and depth of analysis. The substantive aspects of this outline will guide the preparation of IEE reports, although not necessarily in the order shown.

A. Executive Summary

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

B. Introduction

4. This section provides a brief background and context of the project.

C. Policy, Legal, and Administrative Framework

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

D. Description of the Project

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

E. Description of the Environment (Baseline Data)

7. This section describes relevant physical, biological, and socioeconomic conditions within the study area, and may be based largely on secondary data if relevant and accurate secondary data is available. It also looks at current and proposed development activities within the project's area of influence, including those not directly connected to the project. It indicates the accuracy, reliability, and sources of the data.

F. Anticipated Environmental Impacts and Mitigation Measures

8. This section predicts and assesses the project's likely positive and negative direct and indirect impacts to physical, biological, socioeconomic (including occupational health and safety, community health and safety, vulnerable groups and gender issues, and impacts on livelihoods through environmental media, climate risks in the context of mitigation and adaptation, and

physical cultural resources in the project's area of influence, in quantitative terms to the extent possible; identifies mitigation measures and any residual negative impacts that cannot be mitigated; explores opportunities for enhancement; identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions and specifies topics that do not require further attention; and examines global, transboundary, and cumulative impacts as appropriate.

G. Information Disclosure, Consultation, and Participation

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

H. Grievance Redress Mechanism

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

I. Environmental Management Plan

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

- (i) Mitigation:
 - (a) identifies and summarizes anticipated significant adverse environmental impacts and risks;
 - (b) describes each mitigation measure with technical details, including the type of impact to which it relates and the conditions under which it is required (for instance, continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate; and
 - (c) provides links to any other mitigation plans (for example, for involuntary resettlement, Indigenous Peoples, or emergency response) required for the project.
- (ii) Monitoring:
 - (a) describes monitoring measures with technical details, including parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits and definition of thresholds that will signal the need for corrective actions; and

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

J. Conclusion and Recommendations

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

APPENDIX 3: OUTLINE OF AN ANNUAL EMP MONITORING REPORT

The borrower is required to prepare and submit to ADB annual monitoring reports that describe progress with implementation of the project EMP, compliance issues, and corrective actions. A sample Table of Contents that can be adapted as necessary is provided below.

Table of Contents

Part I Introduction

- Construction activities and Project Progress during previous 6 months
- Changes in project organization and Environmental management team
- Relationships with Contractors, owner, lender, etc.

Part II Compliance to Safeguards Provisions in Agreements Under the Project

- Compliance to Loan Agreement
- Compliance to Project Administration Manual
- Compliance to Civil Works Contracts Agreement

Part III Environmental Monitoring

- Environmental monitoring summary – summarize the previous six months monitoring data and provide explanations of any instances where environmental standards or guidelines are exceeded. Typically, this will cover:
 - Noise and Vibration
 - Water Quality
 - Air Quality
 - Flora and fauna monitoring
- Recommendations are required to show how any exceedances will be prevented in the future.
- Graphs can be used in this section to show trends; however large tables of data or multiple graphs should be attached as an appendix.

Part IV Environmental Management

- EMS, SSEMP and work plans. Report on delivery of documents, required amendments etc.
- Site Inspections and audits – summarize the number and type of site visits
- Non-compliance notices – summarize the details on the number of notices given out and the issues covered. Summarize the ranking of issues.
- Corrective action plans - report on timeliness of preparation and completion
- Consultation and complaints – report on any consultation undertaken and list any complaints received.

Annexes

- Monitoring data
- Photographs
- Implementation report on EIA/IEE mitigation requirements

Reference	Requirement	Action to date	Action required/comment