

THE REPUBLIC OF TAJIKISTAN

FINAL

Environmental and Social Action Plan

Dushanbe to Uzbek Border Road Improvement Project:
M41 Road from Avicenna Monument to West Gate

Financed by the European Bank for Reconstruction and Development
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For
Ministry of Transport, the Republic of Tajikistan

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European Bank
for Reconstruction and Development



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Abbreviations

CSC	Construction Supervision Consultant
EBRD	European Bank for Reconstruction and Development
ESMS	Environment and Social Management System ("ESMS")
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ILO	International Labour Organization
LRF	Livelihood Restoration Framework
MoT	Ministry of Transport of the Republic of Tajikistan
NTS	Non-Technical Summary
PR	Performance Requirements
PIU	Project Implementation Unit
RT	Republic of Tajikistan
SEP	Stakeholder Engagement Plan
TRSMP	Traffic and Road Safety Management Plan

Glossary

Mitigation Measures	Mitigation measures are the means by which potential impacts for the project are avoided or reduced to appropriate levels through modifications to the task or to the context of the task
OK	OK is a Russian Word, " <i>Okroojznoyo Kolso</i> " means "Roundabout"
RoW	A right-of-way is a strip of land that is granted, through an easement or other mechanism, for transportation purposes, such as for a rail line or road. A right-of-way is reserved for the purposes of maintenance or expansion of existing services with the right-of-way. In the case of an easement, it may revert to its original owners if the facility is abandoned. In Tajikistan, road rights-of-way are considered government property by the Ministry of Transport by applicable state laws.
Resettlement	It encompasses displacement and resettlement. The EBRD policy refers to physical (relocation/loss of shelter) and economic (loss of assets/access to assets and loss of income/livelihood) displacement as result of project-related land acquisition
TRSMF	Traffic and Road Safety Management Plan

Units of Measurement

km kilometer
m² square meter

1. INTRODUCTION

Taking into account the findings of the Environmental and Social Impact Assessment (ESIA) Report of November 2014, an Environmental and Social Plan (ESAP) has been developed for the Project. The ESAP contains mitigation and performance improvement measures and actions that address the identified social and environmental issues and gaps. The mitigation measures are actions designed to ensure that the Project will operate in compliance with relevant Tajikistan national laws and regulations, as well as EBRD's Environmental and Social Policy (2008) Performance Requirements (PRs) in all relevant stages of the Project. The ESAP focuses on avoidance of identified environmental and social impacts where possible, or on the mitigation measures to minimize or reduce possible impact to acceptable levels.

This ESAP has been revised in November 2014 taking in to account the environmental and social requirements of the EBRD. As such, this report supersedes the previous version prepared in July 2012¹. Further, the ESAP is the key tool to address and mitigate any environmental or social issues that have been identified during Environmental and Social Impact Assessment (ESIA) undertaken in November-December 2014, and to ensure that project meets the Performance Requirements of EBRD (PRs).

The purpose of this ESAP Report is to satisfy the environmental and social safeguard requirements of the Republic of Tajikistan and the EBRD, as well as to fulfill the requirements written in the loan document of Dushanbe to Uzbek Border Road Improvement Project.

Further to note, the EBRD agreed to finance the project of rehabilitation of the existing road M41 in the city Dushanbe within Avicenna monument and West Gate which is 4.9 km length. The project aims to improve and develop transportation infrastructure in Dushanbe. The works will comprise the widening of and improvements to existing road, including upgrading works at the Avicenna Monument roundabout (km 0.0) and 82nd circle roundabout (km 1.2).

However, according to the EBRD's Environmental and Social Policy, this project is classified as Category "A" because the project could result in potentially significant adverse temporary environmental impacts during construction. No land acquisition and resettlement issues are associated with this project, as the project route follows the existing Right of Way (RoW).

The ESAP has been prepared to achieve the following:

- The implementation of EBRD Policy requirements ('the Standards');
- The effective communication of the Standards to third parties responsible for conducting activities to which the Standards relate;
- A reporting and management system to ensure the Standards are being implemented correctly by third parties;
- Effective communication with possible temporarily affected communities to ensure their interests is identified and grievances addressed during construction. In fact, this project is

¹ *Environmental and Social Action Plan, Alfa04, July 2012*

not affecting any individual, business or any community due to lack of land acquisition and resettlement issues.

- The implementation of adequate health and safety measures to protect workers and third parties impacted by the M41 road development;
- The implementation of environmental and social mitigation measures required by the Project Implementation Unit (PIU) and other relevant authorities of the Republic of Tajikistan;
- Regular reporting of progress to Executing Agency and EBRD.

The ESAP will become a part of the financing documentation to be agreed for the Project and compliance with the Environment and Social Management Plan (ESMP) will be a condition precedent for financing. Environmental, Labour Health and Safety Laws and Regulations of the Republic of Tajikistan will be applicable during the design and construction of the Project. Where PRs of EBRD do not exist in Law and Regulations of the Republic of Tajikistan (or where a national standard is superseded by an international standard); the aforementioned international standards and principles will apply (where relevant).

The Project Implementation Unit (PIU) of Ministry of Transport is the responsible agency for implementing this ESAP and the requirements of the Environmental and Social Impact Assessment (ESIA).

The actual construction works will be undertaken by a construction contractor (hereinafter "Contractor") to be appointed by MoT. Part of the ESAP requirements and responsibilities will rest with the Contractor. At the time of preparing the ESAP the method of contracting of the Contractor has not been determined. Further details of contract's requirements regarding environmental and social issues was not available at the time of preparing the ESAP; therefore this ESAP outlines precautionary measures to minimize social impacts and regarding the required standards for working conditions for the workforce.

2. METHODOLOGY

This ESAP report has been developed in consideration of the observations during the field visits of November 2014, discussions with people and executive agency, and review of design performed by the Socio-Environmental Expert. The review and recommendations stated in the previous ESAP report already submitted to MoT and EBRD in 2012 have also been recognized.

However, this ESAP is the result of a major inter-disciplinary effort. The data from the following disciplines were also reviewed and incorporated in to the ESAP study.

- Engineering
- Hydrology
- Public Health
- Temporary Land Acquisition and Resettlement Possibility
- Environmental and Social Survey Operations conducted in November 2014

Further, during preparation of this report conducted empirical site visit and review of relevant documents from secondary sources. These activities allowed identifying and assessing the environmental and social issues associated with proposed project. This appraisal was based on the current detailed design available in November 2014 at the time of the assessment.

Simultaneously with developing of this ESIA following documents supporting adherence to EBRD Policy have been prepared:

- Environmental and Social Management Plan (ESMP) as a part of Environmental and Social Impact Assessment (ESIA) Report,
- Stakeholder Engagement Plan (SEP),
- Non-Technical Summary (NTS),
- Livelihood Restoration Framework (LRF).

However, considering the situation and requirement, a change management system is to be implemented to allow assessment of the potential impact of changes as the design develops. This will allow assessment, monitoring and recording of potential changes and maintain compliance with Tajikistan laws and regulations and EBRD requirements throughout the design stages of the project and throughout the permitting process as well. Conditions and requirements of the permit documentation have to be implemented in the updated ESAP. Upon any amendment, the amended ESAP will be communicated to all relevant parties and stakeholders.

3. ENVIRONMENTAL AND SOCIAL ACTION PLAN TABLE

This Environmental and Social Action Plan (ESAP) includes a series of actions that will be undertaken by the Construction Contractor following supervision of Construction Supervision Consultant (CSC) and Project Implementation Unit of Ministry of Transport (MoT). The issues specified in the Table-3.1 are to manage – that is, to plan and implement specific measures to avoid, reduce, control and mitigate, or compensate for, the potential environmental, occupational health and safety, and social impacts during construction and operation².

The ESAP will be part of the legal financing agreement between MoT and the EBRD, in which the implementation of the ESAP is an affirmative covenant. MoT will be obligated to report periodically on the status of the implementation of each of the required actions to the EBRD (report on environmental, social and occupational health and safety (ESHS) matters) and their performance and implementation will be closely monitored by the EBRD and the EBRD appointed Lender's Engineer.

The following environmental and social actions are required to fulfill the EBRD's environmental and social requirements, within the timescale indicated. The ESAP is divided into three parts; the first describing management, procedural and monitoring requirements to be implemented across

² For purposes of this ESAP, "construction" includes all actions in the field to construct or reconstruct the road project, including support and ancillary facilities such as construction camps, roads, temporary or permanent buildings, staging areas, etc. "Operation" means routine and non-routine operation and maintenance of the road corridor and support facilities, and "project implementation" includes the entire period of construction and operation.

the project, the second detailing measures proposed for further design phase, and the third describing the specific mitigation measures and requirements detailed in the ESAR and ESMP for pre-construction and construction phases. Responsibility for discharging each action has been assigned, and if external resources or support are anticipated to be required to discharge the commitments, an indication of this external source of cost has been provided.

As specified in various required actions, or as otherwise agreed by the parties, this ESAP may be amended from time to time with the prior written consent of EBRD during project implementation as long as the legal agreements between MoT and EBRD remain valid. No amendments or changes will allow violation of Tajikistan law or of EBRD requirements for environmental and social performance (Designated Performance Requirements).

The Table-3.1 below presents the actions required by this ESAP, organized by the EBRD's Performance Requirements. The Table shows the source and timing of the requirement and the criteria by which performance of the action will be evaluated. This is expected to be accomplished by inclusion of appropriate requirements and conditions in tender documents, contracts and subcontracts, and by direct oversight and supervision by PIU-MoT as needed.

Table-3.1: Environmental and Social Action Plan Table

Ref. No.	Issue/ Potential Impact	Mitigation Measure/action	EBRD PR No/ Legislative Requirement	Responsible Party	Time Frame	Associated Costs
1. General Requirements - Environmental and Social Management						
1.1	Applicable standards	The MoT shall manage the Project's Environmental, Social, Health and Safety ("ESHS") matters in a manner that is compliant with: applicable national standards; and International good practice and EBRD's Environmental and Social Policy (2008).	PR 1	MOT & Contractors	All phases	-
1.2	Severance during Road Design	Particular care is needed in the design of a road or bridge to ensure that existing vehicular and pedestrian links are noted and that they are kept open or are accommodated in some way in the proposed project alignment. For example, where new bridge approach roads sever existing cross routes, underpasses should be provided to permit existing movements to continue. Where there is no change in level, junctions should be designed to allow the safe crossing of the new road.	PR 1	MoT & Contractors	All phases	To be included in Project Cost
1.3	Approvals and Permits	Obtain all required permits for the Project and comply with permit requirements and conditions.	PR 1	MoT & Contractors	All phases	To be included in Project Cost
1.4	Road Safety	The Road Safety division should be established and reorganized and ask to audit all new road projects including M41 Road and to give advice on detailed engineering mitigation measures to ensure, for example, safe highway alignments, road cross-sections and junction layouts.	PR 1	MoT & Contractors	All phases	To be included in Government Revenue
1.5	Environmental and Social	The Contractor shall implement an ESMS for the Project to ensure ongoing compliance with	PR 1	Contractor	Prior to Construction	

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Ref. No.	Issue/Potential Impact	Mitigation Measure/action	EBRD PR No/ Legislative Requirement	Responsible Party	Time Frame	Associated Costs
	Management System ("ESMS")	applicable ESHS standards. The ESMS will incorporate the following elements: (i) management program; (ii) organizational capacity; (iii) training; (iv) community engagement; (v) monitoring; and (vi) reporting. The ESMS including this ESAP may be incorporated into Contractor's corporate E&S management system.				
1.6	Organizational capacity	The MoT and Contractor shall establish, maintain, and strengthen as necessary an organizational structure that defines roles, responsibilities, and authority to implement the ESAP and associated management system. Specific personnel, including management representative (s), with clear lines of responsibility and authority should be designated. Key social and environmental responsibilities should be well defined and communicated to the relevant personnel and to the rest of the organization. Sufficient management sponsorship and human and financial resources will be provided on an ongoing basis to achieve effective and continuous social and environmental performance.	PR1	MoT, Contractor	Prior to construction	
1.7	Social Issues	The Contractor shall incorporate social requirements into the ESMS that addresses local community and other stakeholder impacts and the EBRD's social requirements. The following shall be included as a minimum: Livelihood Restoration Framework and associated reporting, Stakeholder Engagement Plan (SEP),	PR2, PR4, PR5, PR10	Contractor	Prior to Construction	

Ref. No.	Issue/ Potential Impact	Mitigation Measure/action	EBRD PR No/ Legislative Requirement	Responsible Party	Time Frame	Associated Costs
		Social Management Plan (SMP), Health and Safety Plan (H&SP). In above mentioned documents a grievance mechanism shall be incorporated. The appointed person with responsibility for the implementation of the social issues shall have the necessary training, authority and responsibility to ensure effective implementation of the plans.				
1.8	Stakeholder Engagement Plan ("SEP")	The MoT shall establish and maintain a Stakeholder Engagement Plan, in order to engage with potentially affected people, including a grievance procedure if any during temporary period at construction stage. During the Construction Period the Contractor will maintain a schedule with a plan of public communication activities that is updated as a minimum on an annual basis. The Contractor shall also endeavor to solicit feedback from community members on the effectiveness of any mitigation measures for construction nuisance as part of the SEP. MoT/Contractor shall set up an on-line web site in order to provide information to the public concerning the Project, the setting up of the worksites, impacts, and mitigation measures. A formal public grievance procedure (as part of the SEP) shall be put in place by the MoT/Contractor for the duration of the Project. The procedure should be made easily available and publicized to all stakeholders. Management and resolution of any grievances will	PR10	MoT Constructor	All phases Established prior to Construction revised during Construction Period	

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Ref. No.	Issue/ Potential Impact	Mitigation Measure/action	EBRD PR No/ Legislative Requirement	Responsible Party	Time Frame	Associated Costs
		be included in E&S monitoring and audits. Details the number and types of public grievances raised and details of how they were resolved shall be included in monthly reports. Within the SEP the MoT/Contractor shall state principles for distribution of information on a timely basis prior to work commencing (i.e. informing affected communities about any construction activities that may affect them - traffic and access obstructions, noise and dust). Communication of the results of Environmental Monitoring (primary noise and air quality) shall be made available to the public.				
1.9	Performance Monitoring and Review	The Contractor shall establish an E&S audit program as a part of management system to monitor the E&S performance of Construction Site, sub-contractors, incorporating an assessment of compliance with this ESAP. A system for following upon non-compliances identified during audits shall be put in place to demonstrate that they are addressed on a timely basis and progress reports.	PR1	Contractor	Quarterly during Construction Period	
1.10	Reporting during the Construction Period	The Contractor will prepare and deliver to the MoT and EBRD monthly reports during the Construction Period. Each report will include information stated in Contract documentation. ESHS matters will cover (i) a safety and environment report giving details of all accidents on Site, current accident rates and preventative measures put in place to prevent or reduce accidents and (ii) any notable events, including events involving the community,	PR1 Contract	Contractor	Monthly during Construction Period	

Ref. No.	Issue/ Potential Impact	Mitigation Measure/action	EBRD PR No/ Legislative Requirement	Responsible Party	Time Frame	Associated Costs
1.11	Reporting to the EBRD	<p>environment and media.</p> <p>The MoT will provide EBRD with an annual ESAP compliance report, summarizing monthly construction/operations reports and include:</p> <p>(1) Information on compliance with the ESHS standards, including the status of any authorization required for the Project, the results of any inspection carried out by any Relevant Authority, any violation of applicable laws, regulations or standards and any remedial action or fine relating to such violation;</p> <p>(2) Information on implementation of the ESAP, including any proposed changes to actions, schedules or costs;</p> <p>(3) Information on the implementation of the Stakeholder Engagement Plan requirements during the Construction Period;</p> <p>(5) Information on the health and safety record of the Project, including the rate of accidents and any initiatives in relation to health and safety matters which have been implemented or planned by the MoT/Contractor;</p> <p>(6) A summary of any change in laws relating to ESHS issues which may have a material effect on the Project;</p> <p>(7) Copies of any information on ESHS issues periodically provided to shareholders or the general public; and</p> <p>(8) Monitoring reports relating to compliance with applicable standards and monitoring requirements including ambient air quality, noise and vibrations, effluent quality, groundwater quality, and solid</p>	PR1	MoT	Annually through all phases of the Project	Project Cost

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Ref. No.	Issue/ Potential Impact	Mitigation Measure/action	EBRD PR No/ Legislative Requirement	Responsible Party	Time Frame	Associated Costs
1.12	Contractors Management	wastes. The Contractor shall ensure that all subcontractors working on the Project meet the EBRD's E&S Requirements, including requirements within this ESAP. Applicable ESHS requirements shall be specified within contractual agreements and be routinely monitored by the Contractor. The Contractor will ensure that all subcontractors are provided with training in ESHS risks associated with their work activities and preventative/mitigation measures to be adopted.	PR1, PR2	Contractor	Construction Phase	Project Cost
1.13	Livelihood Restoration Framework ("LRF")	The MoT will be responsible for the implementation of the LRF which has to comply with national law and the EBRD's Requirements, including: Consultations with affected communities; Grievance mechanism; Monitoring; Reporting.	PR5 Land Code	MoT	All phases Established prior to Construction revised during Construction Period	
	Support to Labor Force	Support labor force by: - Providing realistic information on employment opportunities, with transparent hiring practices - Advertise for all positions - Employing local labor where possible - Pay wages at least average for the area for comparable positions - Construction camp must comply with Tajikistan law and EBRD requirements and provide adequate heating, showering, toilet and cooking facilities.	Best international practices PR2 EBRD Guidance Notes on labor and working conditions	MoT	Throughout Construction	Project Cost

Ref. No.	Issue/ potential impact	Mitigation Measure/Action	EBRD PR#/ Legislative Requirement	Responsible Party	Time Frame	Associated Costs
2. Requirements for Design Process						
2.1	EIA procedure	In order to comply with national EIA legislative the entity authorized by MoT (designer) shall prepare <i>OVS (OVS is a Russian term, means Report on EIA)</i> documentation as a part of the Detailed project design and shall apply for State Ecological Expertise (SEE) in accordance with the procedure stated in the "Law on State Ecological Expertise".	PR1 RT Law on Environmental Protection RT Law on State Ecological Expertise	Designer	During detailed design Phase	
2.2	Protection of Flora	During the Detailed Design preparation a design of planting trees will be developed and approved by Dushanbe City Authority	PR6 Law on Flora and Fauna Use and Protection The order of felling trees in the city of Dushanbe	Designer	During detailed design Phase	Additional Sub-project needs to be developed and cost determined by City Authority & MoT
2.3	Water Protection	During the Detailed Design preparation design the arrangements for water protection to meet standards for water quality regarding the rain water drainage from carriageway	PR3 RT Water Code	Designer	During detailed design Phase	
2.4	Flood Protection	During the Detailed Design provide appropriate arrangements for flood protection regarding specific surface water runoff conditions of the area (Short duration Urban Flooding)	PR3 RT Water Code	Designer	During detailed design Phase	
2.5	Organization Plan for Construction	Preparation of Organization Plan for Construction, including inter alia: Location of borrow pits to be used Location of crushing plants Location of concrete and asphalt plants Location of waste disposals	PR3 RT Law on Environmental Protection RT Water Code RT Law on	Designer	During detailed design Phase	

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Ref. No.	Issue/potential impact	Mitigation Measure/Action	EBRD PR#/Legislative Requirement	Responsible Party	Time Frame	Associated Costs
		Locations for storage of construction and other materials Routes of construction traffic Location of construction camps Defining the measures for air protection from dust Defining the measure for noise and vibration protection	Ambient Air Protection RT Law on Production and Consumption Wastes			
2.6	Traffic and Road Safety	A traffic & road safety management plan (TRSMP) shall be designed for the Project with the goal of preventing traffic accidents and minimizing injuries suffered by the Project personnel and the public. This TRSMP shall be approved by local authorities, monitored and updated through the different phases of the Project.	PR3, PR4	Designer	During detailed design Phase	

Ref. No.	Issue/potential Impact	Mitigation Measure/action	EBRD PR No/ Legislative Requirement	Responsible party	Time Frame	Associated Costs
3. Specific Requirements for Pre-construction and Construction Phases						
3.1	Social Management	A social management plan will be incorporated into Contractor's management programs. It will include: Management of worker relationships and working conditions in a manner that is in compliant with applicable national legislative, ILO conventions and EBRD's requirements, including implementation of human resources policy; Social management shall include non-employee workers in compliance with EBRD's requirements; Providing appropriate accommodation for workers in compliance with national legislative and international good practice; Health care and safety; Procedure for worker grievances; Monitoring provisions for the impacts on communities. The Contractor shall establish and maintain Occupational Health and Safety (OHS) management system as a part of ESMS.	PR2 ILO conventions RT Labour Code RT Law On Labour Protection RT Law on Occupational Safety RT Law On Public Health	Contractor	Prior to Construction	
3.2	Atmospheric Contaminants	The PIU-MoT should appoint an independent Consultant to assess the baseline atmospheric pollutants (dust, CO, NOx, SOx, PM etc.) level in the area of the project and to evaluate the potential contamination level increase due to the increased vehicular traffic.	PR3	PIU-MoT	Before construction	Project Cost
3.3	Waste Management	Develop and maintain comprehensive waste management plans at project site. Plans should include (at a minimum): - Procedures for proper handling of all waste generated during reconstruction and operational sites	PR 3	Contractor	During construction	Project Cost

Ref. No.	Issue/potential Impact	Mitigation Measure/action	EBRD PR No/ Legislative Requirement	Responsible party	Time Frame	Associated Costs
		- Methods to verify proper off-site management of construction related wastes by contract waste managers.				
3.4	Health and Safety Management	The Contractor shall develop a Health and Safety management plan/procedures to comply with applicable national legislation and the EBRD's requirements. The plan shall address as a minimum the following requirements: Establishment of H&S Policy; H&S risk identification and assessment (affected community and workers); Provision of preventive and protective measures; Provision of appropriate equipment to minimize risks, and requiring and enforcing its use; Training of personnel; Security personnel management; Documentation and reporting of occupational accidents, diseases and incidents.	PR4 RT Law on Occupational Safety RT Law On Public Health	Contractor	Prior to Construction	
3.5	Emergency Preparedness and Response Plans	On the basis of the H&S risk assessment from project-related activities, Contractor will identify major-accident hazards, and will take all measures necessary to prevent major accidents and to limit their consequences for humans and the environment. Such measures will be identified in a major-accident prevention/emergency preparedness policy and an appropriate management system including organizational structures, responsibilities, procedures, communication, training, resources and other aspects required to implement such policy and	PR3, PR4 RT Law on Protection of the population and territories from emergency situations of natural and technogenic character RT Law On	Contractor	Prior to Construction	

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		<p>to respond effectively to emergencies associated with project hazards.</p> <p>The management system will include an internal and an external emergency plan. External emergency plans will be established with the objectives of:</p> <p>Containing and controlling incidents so as to minimize the effects, and to limit damage to humans, the environment and property;</p> <p>Implementing measures necessary to protect humans and the environment from the effects of major accidents;</p> <p>Communicating the necessary information to the public and to the emergency services or public authorities concerned in the area;</p> <p>Providing for the restoration and clean-up of the environment following a major accident if any.</p>	Sanitary and Epidemiological Safety of Population RT Water Code			
3.6	Hazardous Materials	<p>The Contractor shall develop hazardous materials management plan/procedures for the management of hazardous materials to comply with applicable national legislation and EBRD requirements. The Plan shall outline responsibilities and procedures for procurement, labeling, transportation, storage and use of hazardous substances. The Plan shall include the provision of suitable personal protection equipment and the provision of portable spill containment and cleanup equipment on site and training in the equipment deployment and emergency response.</p> <p>All hazardous materials will be transported in accordance with national legislative requirements</p>	PR3 RT Law on Environmental Protection RT Water Code RT Law on Air Protection	Contractor	Prior to Construction	

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		and EU Directives on Site (with regard to the obligation of the Concessionaire who shall apply the same obligation for specialized contractors for transport outside the Site).				
3.7	Waste Management	The Contractor shall develop Waste management plan/procedures for construction and operations to ensure compliance with national legislation and EBRD requirements. The plan shall include: Regulatory requirements, such as, Responsible parties or agencies; Waste minimization measures that considers prevention, reduction, reuse, recovery, recycling, removal and finally disposal of wastes; Designation of places and conditions on waste handling; Special measures for hazardous waste handling; Emergency measurements; Procedures for recording waste generation, transfer and management; Reporting; Training. The Contractor shall use licensed waste contractors to ensure Project waste is transported and treated and/or disposed of at appropriately designed facilities.	PR3 RT Law on Production and Consumption Wastes	Contractor	Prior to Construction	Contractors' Cost
3.8	Noise	The Contractors shall develop noise and vibration procedures to minimize construction noise during the construction phase to meet applicable national and any applicable requirements. Potentially noisy activities will be planned in consultation with local communities, so that activities with the greatest potential to generate noise are planned during	PR3 RT Law On Environmental Protection RT Law On Ambient Air Protection	Constructor	Construction Period	Constructor's Project Cost

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		<p>periods of the day that will result in least disturbance.</p> <p>The transport connected with the construction will be conducted only along the routes proposed in the TRSMP.</p> <p>Noise standards will be strictly enforced to protect construction workers from noise impacts, in accordance with the national law and international HSE procedures. Such impacts will be assessed during H&S risk analysis.</p> <p>Noise generation during the construction and operation phases will be monitored according to the approved design of environmental monitoring. The results of monitoring shall be reported following ESAP directive.</p>				
3.9	Air quality	<p>Air quality and emissions shall not exceed national or any applicable limits for ambient air quality. During the construction the contractors' shall implement arrangements to reduce the dust emission into the management program to meet requirements of respective authorities. The arrangements shall include as a minimum:</p> <p>Dust suppression techniques should be implemented minimizing dust from open area sources, including storage piles, by increasing the moisture content; Access roads will be sprinkled during long dry and windy period;</p> <p>Ensure the cleaning of roads used for construction.</p>	PR3 RT Law On Ambient Air Protection	Contractor	Construction	Contractor's Project Cost
3.10	Water quality	<p>As part of the management program the contractor shall implement arrangements to minimize adverse environmental impacts in terms of water protection</p>	PR3 RT Water Code	Contractor	Construction	Contractor's Project Cost

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		to comply with applicable national legislation and requirements of local authorities. Water protection will focus particularly on: Proper storage of hazardous materials and substances; Implementation of preventive measures against the leakage of dangerous substances; Regular control of technical status of building mechanisms and vehicles; Emergency preparedness.				
3.11	Archaeology/Cultural Site	Following national Laws, relocation of Avicenna Monument at an appropriate recognized site.	PR8 RT Law On protection and use of historical and cultural heritage	Contractor	Construction Period	Project Cost
3.12	Subsidiary Facilities	Only subsidiary facilities authorized by state environmental authorities can be used during construction (borrow pits, mixing asphalt plants, concrete plants etc.).	PR3 RT Law On Environmental Protection	Contractor	Construction	--

4. CONCLUSION

This Environmental and Social Action Plan (ESAP) has been developed to mitigate the adverse impacts of the project. The ESAP focused requirements for: a Construction Health and Safety Plan; a Construction Environmental and Social Management Plan; a Landscape Management Plan; Traffic Management Plan requiring advanced notice of works and road diversions; consideration of urban-flood prevention, management measures for extreme weather events; a grievance mechanism for workers and the implementation of the Stakeholder Engagement Plan.

During construction, temporary potential environmental impacts will arise from waste disposal, air pollution, noise pollution, disposition of solid wastes, effects on plants, and wildlife. Each environmental problem area was investigated and the magnitude of the impacts on ecosystem determined. Wherever adverse impacts were identified, rational and comprehensive mitigation measures were specified in this ESAP developed by SAI Consulting Engineers Pvt Ltd in December 2014.

Further, the contractor will implement the mitigation measures identified in this ESAP while project design review and supervision consultants (SAI Consulting Engineers Pvt Ltd) will conduct regular monitoring to ensure contractor's compliance with applicable provisions of the ESAP.

The local communities expressed support for the project during the consultations as they clearly realized the benefit to the trade and transport sectors. Based on the results of the ESIA Report, the adverse environmental and social impacts of the Dushanbe to Uzbek Border Road Improvement Project (DUBRIP) can be minimized to acceptable levels by implementing the fund for environmental and social management activities.

The recommendation from environmental and social analysis is for the DUBRIP to go ahead as soon as possible.