

Environmental Monitoring Report

PUBLIC

Project Number: 52042-001
Semestral Report: July-December 2025
August 2026

**TAJIKISTAN: Central Asia Regional Economic
Cooperation Corridors 2, 3, and 5 (Obigarm-Nurobod)
Road Project**

Prepared by Project Implementation Unit for Roads Rehabilitation for the Ministry of Transport of the Republic of Tajikistan and the Asian Development Bank.

CURRENCY EQUIVALENTS

(as of 23 January 2026)

Currency unit	–	Somoni (TJ)
TJS1.00	=	\$0.106964
\$1.00	=	TJS9.34892

ACRONYMS AND ABBREVIATIONS

ADB	Asian Development Bank	HPP	hydropower project
AIIB	Asian Infrastructure Investment Bank	HSE	health, safety, and environment
AQMP	air quality management plan	IA	Implementing Agency
BMP	biodiversity management plan	IES	international environmental specialist
BOD	biological oxygen demand	IEEM	international external environmental monitor
CAREC	Central Asian Regional Economic Cooperation	IFC	International Finance Corporation
CAP	corrective actions plan	LARP	land acquisition and resettlement plan
CEP	committee for environmental protection	LEPP	local employment and procurement plan
CEPRT	Committee for Environmental Protection under the Government of the Republic of Tajikistan	LIEC	loan implementation environment consultant
CLO	community liaison officer	LWCMP	labor and working conditions management plan
CO	carbon monoxide	MoT	Ministry of Transport
CO ₂	carbon dioxide	MPC	maximum permissible concentration
CoC	Code of Conduct	NEEC	national external environmental consultant
CSC	construction supervision consultant	NES	national environment specialist
CSRM	country safeguards review mission	NO	nitrogen oxide
CSEP	contractor stakeholder engagement plan	NO ₂	nitrogen dioxide
DLP	defect liability period	NVMP	noise and vibration management plan
DO	dissolved oxygen	OFID	OPEC Fund for International Development
DW	drinking water	PIA	preliminary impact assessment
EA	Executing Agency	PIURR	Project Implementation Unit Road Rehabilitation
EBRD	European Bank for Reconstruction and Development	PMO	project management office
EHSS	Environmental and Health and Safety System	PPE	personal protective equipment
EIA	environmental impact assessment	RoT	Republic of Tajikistan
EMP	environmental management plan	RoW	right of way
EMoP	environmental monitoring plan	SAEMR	semi-annual environmental monitoring report
EMoR	environmental monitoring report	SDS	spoil disposal subplan
ERP	emergency response plan	SEE	state ecological expertise
ES	environmental specialist	SS	suspended solids
ESMS	environmental and social management system	SSEMP	Site-Specific Environmental Management Plan
ESP	environmental and social policy	SO ₂	sulfur dioxide
EU	European Union	SPS	safeguard policy statement
FIDIC	The International Federation of Consulting Engineers	SW	surface water
GAP	gender action plan	STD	sexually transmitted disease
GoT	Government of Tajikistan	TMP	traffic management plan
GRM	grievance redress mechanism	ToR	terms of reference
GW	groundwater	TSP	total suspended particles
HIV	human immunodeficiency viruses	WMMP	waste and materials management plan

NOTES

- (i) The fiscal year of the Government of Tajikistan and Ministry of Transport ends on 31 December.
- (ii) In this report, "\$" refers to United States dollars.

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SUMMARY PROJECT INFORMATION

GENERAL INFORMATION	
Project title:	Central Asia Regional Economic Cooperation Corridors 2, 3, and 5 (Obigarm-Nurobod) Road Project
Date of project effectiveness:	31 March 2021
Executing agency:	Ministry of Transport
Implementing agency:	Ministry of Transport, Project Implementation Unit on Road Rehabilitation
PMO (name of agency):	Project Implementation Unit on Road Rehabilitation
PMO Environment Officer (name, email):	Shakirova Sharis, sharis_piurr@mail.ru
Loan implementation consultant / firm:	
LIEC:	none
Construction supervision company(ies):	JV (Temelsu International Engineering Services Inc. (Turkey) & CTI Engineering International Co., Ltd (Japan) and Sub Consultant LLC «Muhandisoni Rohnamo (Tajikistan)
Contractor(s):	Hunan Roads & Bridge Construction Group Company Limited
ADB web link to EMP:	https://www.adb.org/sites/default/files/linked-documents/52042-001-eiaab.pdf
Domestic web link to EMP:	https://mintrans.tj/storage/tender/files/uAfY02OI4Pye9w8cs0WRKfhpSjHISXqYkdjoXd8.pdf

ENVIRONMENTAL SAFEGUARD MONITORING	
ADB environment safeguard category:	A
Environmental report prepared as per ADB requirements for this category:	Environmental Impact Assessment
Domestic safeguard report:	None
Quarterly period covered by this report:	1 July 2025 to 31 December 2025
# EMRs to date including this report:	10th EMRs to date including this report
Agency/person responsible for internal* environmental monitoring:	Shakirova Sharis
Agency/person responsible for external* environment monitoring:	Cherry Revira
Agency/person responsible for compliance* environment monitoring:	None this reporting period (July – December 2025)
Agency/person responsible for independent compliance* monitoring:	None this reporting period (July – December 2025)
Overall status of environmental safeguards:	On track (by end of this reporting period)

ADB = Asian Development Bank, EMP = environmental management plan, EMR = environment monitoring report, LIEC = loan implementation environment consultant, PMO = project management office.

*See Section III.3 for definitions of internal, external, compliance, and independent compliance monitoring.

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EXECUTIVE SUMMARY

1. This Environmental Monitoring Report (EMR) assesses the implementation progress of the Environmental Management Plan (EMP) for the Central Asia Regional Economic Cooperation (CAREC) Corridors 2, 3, and 5 (Obigarm–Nurobod) Road Project for the period from 1 July 2025 to 31 December 2025. The report complies with the Asian Development Bank's (ADB) Safeguard Policy Statement (SPS, 2009) and the environmental provisions of the project loan agreement.
2. This 10th EMR focuses on the remaining civil works and decommissioning phase and documents the completion of mitigation measures and EMP implementation. The project became effective on 31 March 2021 and, as of 31 December 2025, achieved 100% physical completion, with the full implementation period elapsed (53 of 53 months). The remaining activities are limited to the completion of electronic and electrical systems in the tunnels and the finalization of building service facilities at the Kandak and Karagach tunnels.
3. During the reporting period, construction activities primarily supported the completion of a climate-resilient two-lane highway, including tunnels and bridges, between Obigarm and Tagikamar. Additional works improved local village road access and the Jabovi Bridge. Key activities included: (i) completion of utility buildings for the Kandak and Karagach tunnels; (ii) installation of tunnel lighting systems; (iii) development of recreational areas; and (iv) decommissioning of the batching plant and other associated auxiliary facilities.
4. The project continued to prioritize the implementation of environmental mitigation measures to ensure compliance and sustainability. Key activities included: (i) monitoring contractor compliance with health, safety, environmental, and social requirements; (ii) restoration of spoil disposal areas and domestic waste management facilities; (iii) care and maintenance of planted seedlings; and (iv) routine road maintenance, including pavement cleaning, street sweeping, and water spraying to control dust emissions.
5. As a Category A project under ADB's SPS, the Project Implementation Unit for Road Rehabilitation (PIURR) engaged both national and international external environmental consultants to independently monitor and verify compliance with environmental requirements. Environmental Monitoring Reports covering the period from 2022 to 2025 were submitted to ADB. Monitoring activities included document reviews and site inspections. The project complied with the environmental provisions of the ADB loan and grant agreements, including securing required permits and maintaining community engagement.
6. The loan and project agreements between the Government of the Republic of Tajikistan and ADB include six environmental safeguard assurances to ensure timely and effective implementation of the EMP and site-specific mitigation measures. All six assurances were fully met during the construction period.
7. No grievances were recorded between 1 July 2025 and 31 December 2025. Overall, this report confirms that the project remained 'on track' at the close of the reporting period.
8. Key lessons learned during the reporting period highlight the importance of: (i) early and continuous engagement with communities to minimize environmental impacts and grievances; (ii) regular equipment maintenance to reduce noise, air emissions, and soil contamination; (iii) effective waste management at construction camps and adjacent areas; (iv) enforcing traffic speed limits and installing warning signage to enhance safety, particularly for wildlife; (v) reducing vehicle speeds near villages, sharp curves, and tunnels; (vi) restoring spoil disposal sites to

support long-term environmental sustainability; and (vii) implementing tree planting along the road corridor to improve air quality, enhance habitats, reduce noise, and promote a greener landscape.

9. During the reporting period, all civil works complied with ADB SPS (2009) requirements, and project-specific environmental mitigation measures were effectively implemented. As the project enters the operational stage, the PIURR will continue post-assessment and physical environmental monitoring in accordance with the Environmental Management Plan outlined in the approved Environmental Impact Assessment. Physical monitoring will be conducted during the spring and summer seasons to ensure continued compliance and environmental performance.

I. INTRODUCTION

1. Purpose of report

10. This Environmental Monitoring Report (EMR) describes and evaluates progress in implementing the Environmental Management Plan (EMP) for the Central Asia Regional Economic Cooperation (CAREC) Corridors 2, 3, and 5 (Obigarm–Nurobod) Road Project for the reporting period 1 July 2025 to 31 December 2025. The project submits this EMR in compliance with the Asian Development Bank's (ADB) Safeguard Policy Statement (SPS) and the loan agreement between ADB and the project executing agency.¹

11. This document constitutes the 10th EMR for the project and covers part of the remaining civil work and decommissioning phase. The report describes: (i) implementation of mitigation measures; (ii) monitoring activities; (iii) expenditures for EMP implementation (including mitigation, monitoring, and training); (iv) reporting; and (v) an overall assessment of key achievements, challenges, issues and lessons learned, during the reporting period.

2. Project outcome, outputs and subcomponents

12. The approximately 75-km road project (Obigarm to Nurobod) will replace a section of the existing M41 highway that will be submerged underwater due to the construction of the Rogun Hydropower Project. The road project passes through mountainous terrain and includes three tunnels with a total length of about 6 km: (i) the Kandak Tunnel of 1.610 km, (ii) the Karagach Tunnel of 1.701 km, and (iii) the Tagikamar Tunnel of 2.590 km.

13. The Road Project includes 13 medium size bridges and a high-level ~700 m bridge over the future hydropower reservoir just before the road rejoins the M41. The Obigarm–Nurobod Road section on the CAREC corridors 2, 3, and 5 will be inundated once the HPP reservoir is filled to operating levels. The realignment of this road section through the river valley is not part of the Rogun HPP project. A bypass road must be completed and opened to the public by which the rising water in the hydropower project reservoir will have inundated several critical sections of the existing M41 highway. No other part of Tajikistan's national highway network can provide for this traffic, and the only alternative route would represent a deviation of about 500 km. The Road Project will restore and improve connectivity between Dushanbe, the northeast region of Tajikistan, and the Kyrgyz Republic via the M41 highway, located on CAREC corridors 2, 3, and 5.

14. The Road Project is divided into three sections:

- (i) **Section 1 – Obigarm – Tagikamar km 0 – km 30+217:** Construction of (a) about 30 km of climate-resilient two-lane highway (including tunnels and bridges) between Obigarm and Tagikamar, and (b) about 30 km of all-weather village access roads; and rehabilitation of about 84 m climate-resilient bridge and about 1.05 km of access roads;²
- (ii) **Section 2 – Nurobod - Tagikamar km 30+217– km 75+600 (excluding the section for Package 3, which runs from km 72+900 to km 74+303):** Includes Tunnel 3 (Tagikamar), six new bridge constructions, one bridge rehabilitation, one

¹ ADB. 2009. Safeguard Policy Statement. Manila.

² Based on Amendments to Grant Agreement accepted and agreed dated 12 March 2024.

road diversion with a new temporary bridge at Darband, and local access roads of approximately 40 km; and

- (iii) **Section 3 - Long Bridge at Darband:** The permanent bridge is approximately 760 m long and is needed to cross the Surkhkhub River at the east end of the alignment.

15. These sections are financed by separate financial institutions presented in Table 1.

Table 1: Sections of the Road Project

Project Road Section	Financier
Section 1: km 0+000 to km 30+217	ADB/OFID
Section 2: km 30+217 to km 75+600, (excluding Section 3 which runs from km 72+900 to Km 74+303)	EBRD
Section 3: km 72+900 to km 74+303 including the 760m bridge	AIIB

16. Section 1 from Obigarm-Tagikamar (km 0+000 to km 30+217) is financed by ADB and OPEC Fund for International Development (OFID). The project also serves seven villages and communities located along the proposed bypass road and other villages and settlements that are located away from the main road but presently rely on the existing M41 highway for access to economic opportunities and social services.

17. The permanent Project Works in Section 1 encompass the construction of (i) approximately 30 km of climate-resilient two-lane highway (including tunnels and bridges) between Obigarm and Tagikamar, and (ii) around 30 km of all-weather village access roads, along with the rehabilitation of an 84-meter climate-resilient bridge and approximately 1.05 km of access roads (see Figures 1 and 2). The road has been constructed to Category III standards as a two-lane asphalt concrete paved road, with a width of 7.0 meters and a thickness of 150 mm, in accordance with the Asian Highway Classification and Design Standards (1993). The bridge work includes the construction of five new bridges and the rehabilitation of one existing bridge. The Kandak and Karagach tunnels have a combined length of 3.3 km.

18. Tunnel-related works include constructing and relocating 10 kVA transmission lines (18 km) and 0.4 kVA distribution lines (3 km) to provide power to the tunnels and lighting along 17.8 km of the road corridor. The Project Road follows the existing M41 Highway 1 km south of Obigarm Town and follows an old alignment that was partly constructed in the 1980s and then abandoned. It passes through undulating rural to mountainous terrain for 33 km through the villages of Bozorak, Labijar, Kandak, Sh. Aslon, Dehi Alisho, Javji Poy, Sadoqat, and Siyohgulak. Section 1 finishes close to the southern portal of the Tagikamar Tunnel (Tunnel No.3).

19. This road project was designed to meet the specifications for Class III roads. Speed and safety signage have been installed in full compliance with the required standards. Additionally, slope stabilization and reinforcement, including embankments, have been carried out along the designated sections, as per the Government of Tajikistan's specifications.

- (i) Approaches to villages – 40 km/h (advisory speed limit)
- (ii) Sharp bends – 50 km/h (advisory speed limit)
- (iii) Tunnels – 40 km/h (advisory speed limit)

20. In accordance with State Standard (GOST) 33475-201529, the road design for Class III roads follows the technical parameters as summarized in Table 2.³

Table 2: Technical Parameters for Class III Roads

Design Parameter	Value
Design traffic speed	50 km/h
Number of lanes	2 ^a
Width of lanes	3.5 m
Width of carriageways	7.0 m
Width of shoulders	2.5
Minimum width of hard shoulders:	1.5 m
• including margin course	0.5-0.75 m
Smallest horizontal curve radius in the plan	50 m ^b
Greatest longitudinal slope	100‰ ^c
Smallest vertical curves:	
• cambered	1,500 m
• saddle like	400 m
Road surface	permanent type
Type of loading for artificial structures	A14 and H14
Pavement load	115 kN

^a In sections with protracted inclines (over 70%), an additional lane in the uphill direction is provided for the freight transport movements.

^b According to the norms of road design of the Asian Highway network.

^c According to minutes of technical meetings.

21. Figure 2 illustrates the road alignment, while Figure 3 presents the typical cross-section of the main road.

22. The project designs approximately 30 km of village access roads, typically 5 m wide, along their alignments as much as possible to minimize resettlement impacts. Based on the preliminary design, the project conducted a Preliminary Impact Assessment (PIA) for the village access roads component. The PIA indicates that rehabilitating the community access roads will not result in significant or severe impacts, with anticipated effects limited to minor impacts on trees, bushes, and fences located within 1–2 m of the access road right-of-way.

23. Figure 4 shows the locations of the village access roads constructed in Section 1, while Figure 5 presents the typical cross-section of the village access road.

³ Source: Project EIA Document.

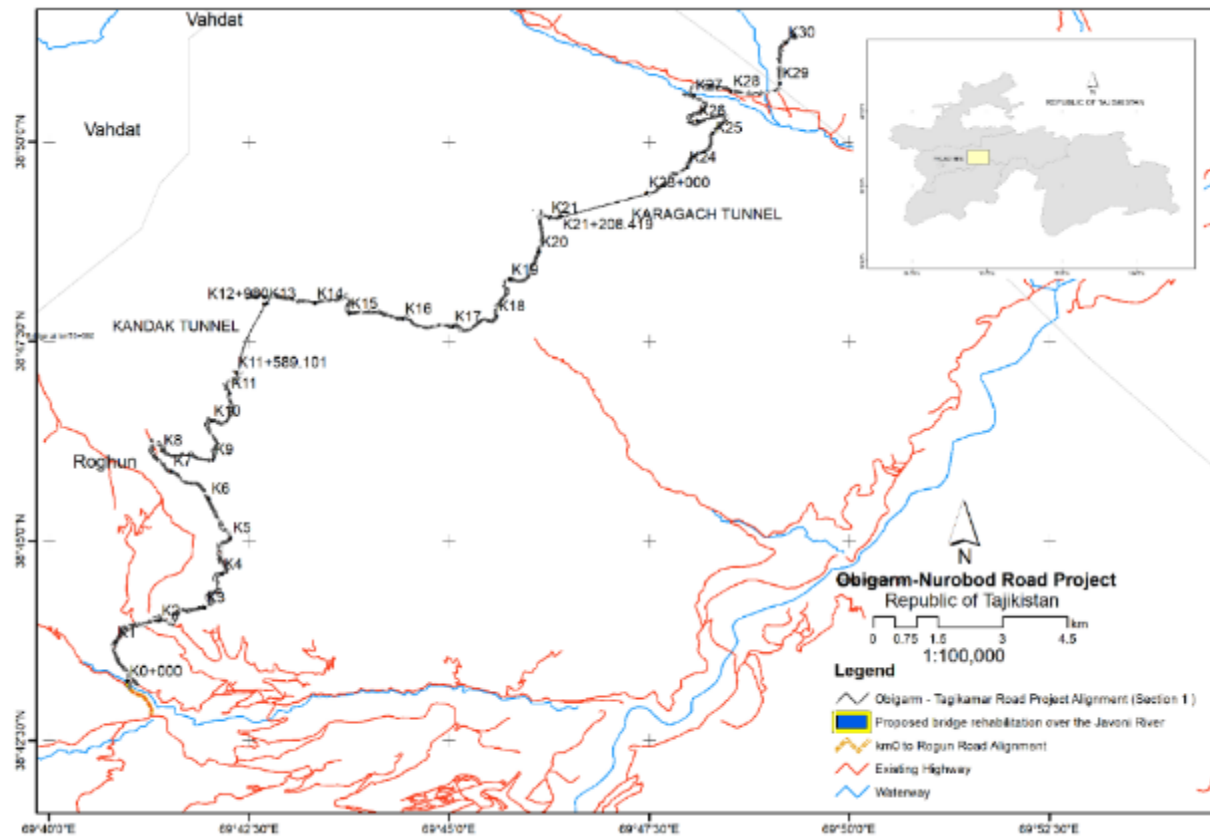


Figure 1: Location of the Obigarm – Nurobod Road Project Section 1

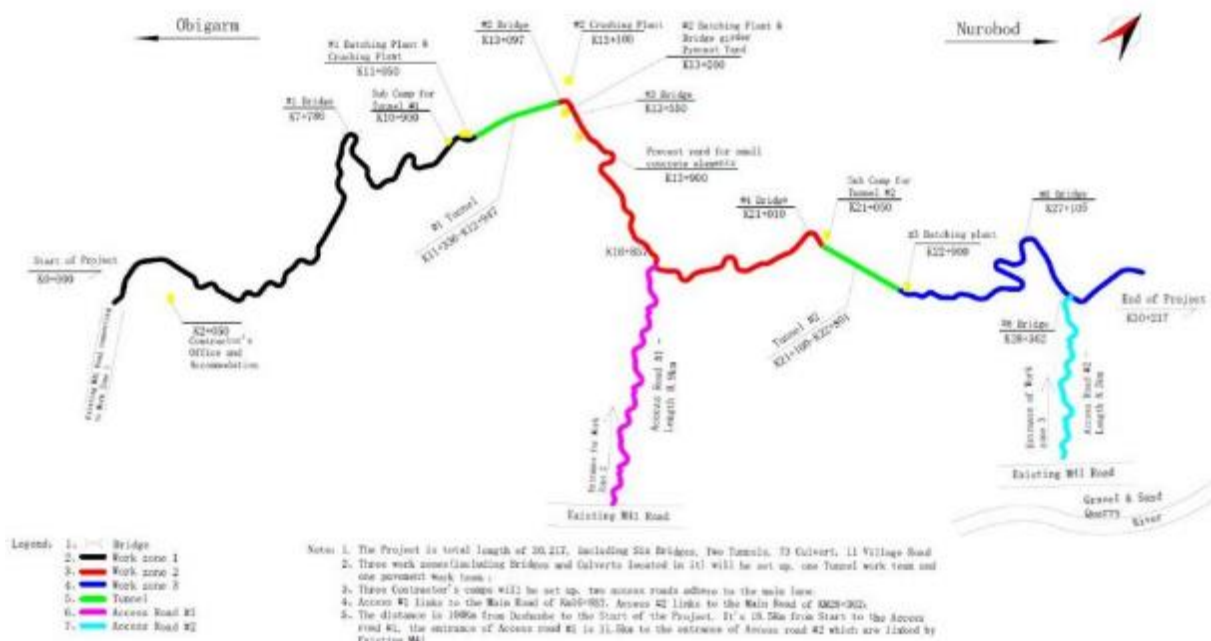
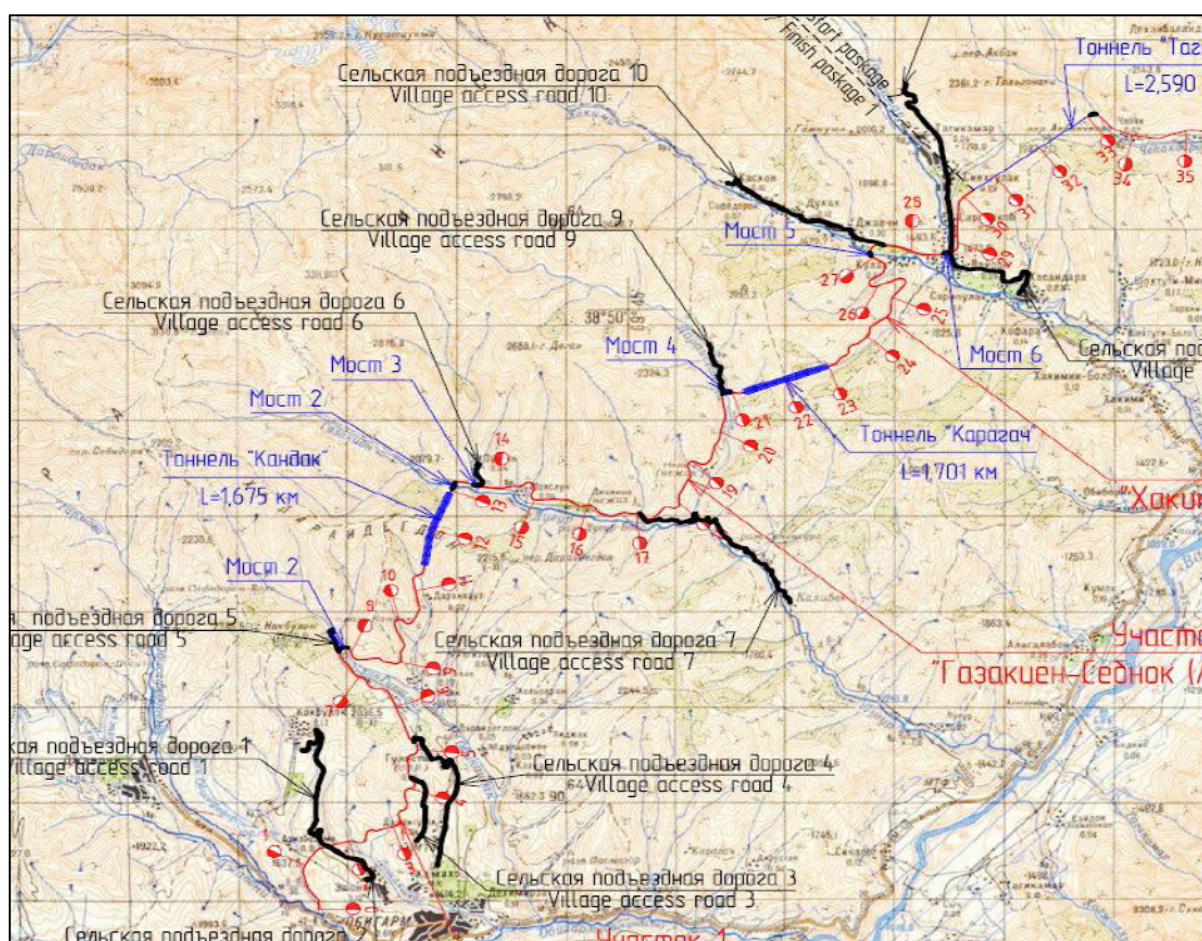
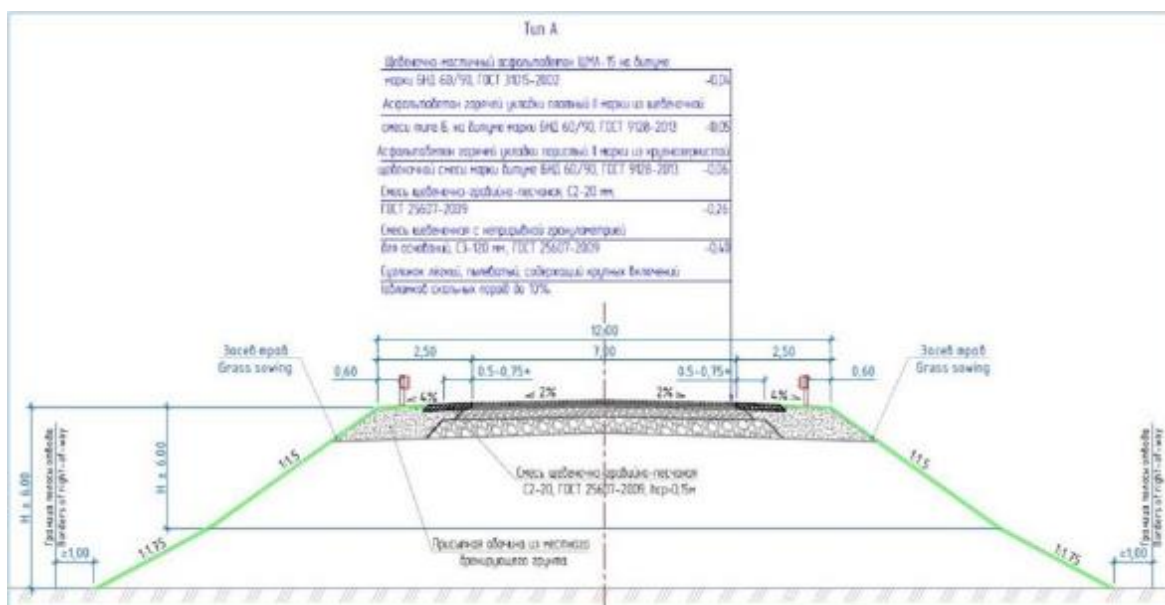


Figure 2: Alignment of the Obigarm – Nurobod Road Project Section 1



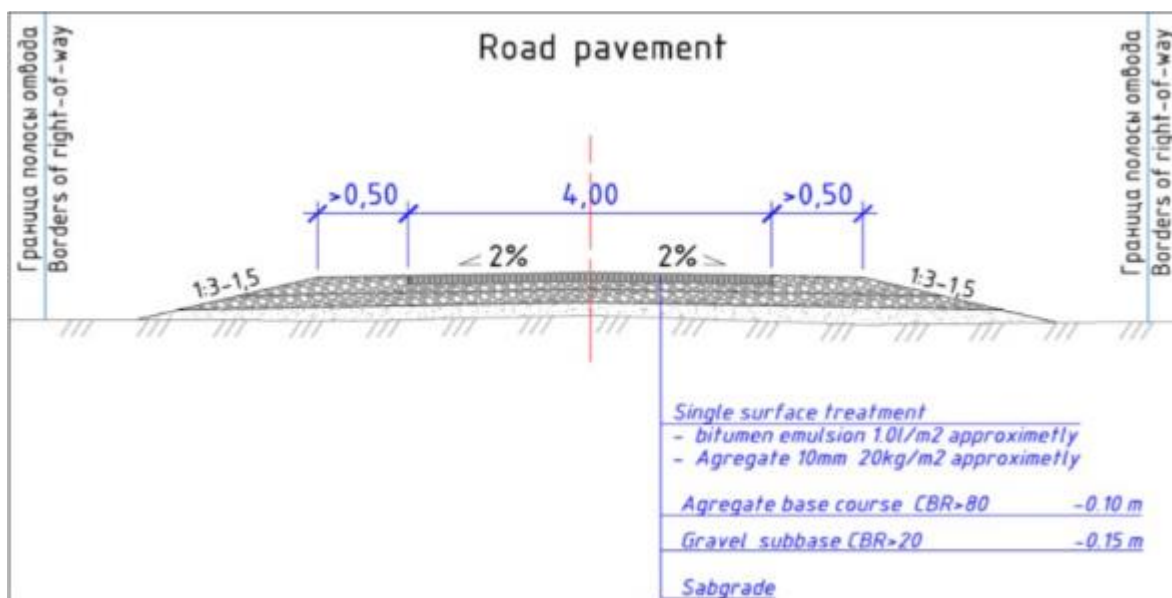


Figure 5: Village Access Road Typical Cross Section

3. Project implementation

24. The project became effective on 31 March 2021. By 31 December 2025, the Project Implementation Unit (PIU) had achieved 100% physical completion, against the elapsed implementation of 100% (53 months out of 53 months since the date of project effectiveness). The road project was formally inaugurated the project on 26 August 2025.

25. ADB currently rates the project as *on track*. Table 3 summarizes the implementation progress of the individual subcomponents.

Table 3: Project Progress Implementation as of 31 December 2025

Contract No.	Contract Name	Status	Civil work starting date	Name of contractor	Name of CSC	Implementation Description
I. Construction of the Obigarm-Tagikamar Road Section (km 0+000 – km 30+217)						
1	Construction of the Obigarm-Tagikamar Road Section (km 0+000 – km 30+217)	Construction phase	31 March 2021	Hunan Roads & Bridge Construction Group Company Limited	JV (Temelsu International Engineering Services Inc. (Turkey) & CTI Engineering International Co., Ltd (Japan) and Sub Consultant LLC «Muhandisoni Rohnamo (Tajikistan)	The overall progress of the major civil works is 100%.
II. Construction of about 30 km of all-weather village access roads; and rehabilitation of about 84 m climate-resilient bridge and about 1.05 km of access roads						
2	Rehabilitation of about 84 m climate-	Construction phase	24 September 2024	Hunan Roads & Bridge	JV (Temelsu International Engineering	The overall progress of the major civil works is at 100%.

Contract No.	Contract Name	Status	Civil work starting date	Name of contractor	Name of CSC	Implementation Description
	resilient bridge and about 1.05 km of access roads			Construction Group Company Limited	Services Inc. (Turkey) & CTI Engineering International Co., Ltd (Japan) and Sub Consultant LLC «Muhandisoni Rohnamo (Tajikistan)	

CSC = construction supervision consultant.

II. SUMMARY OF THE PROJECT ENVIRONMENTAL MANAGEMENT PLAN

26. The project environmental management plan (EMP) is the primary reference document for the government and ADB for all environment-related mitigation, monitoring, reporting, and training activities for the project. Timely and effective implementation of the EMP is a key condition of the loan agreement between the government and ADB. The EMP was prepared as part of the environmental impact assessment in 2019. The EMP has been actively implemented throughout more than 4.25 years of construction, ensuring compliance until June 2025. The content of the EMP includes institutional roles and responsibilities for EMP implementation; mitigation measures for environmental safeguard risks; environmental monitoring and reporting; training and capacity building; grievance mechanism (GM); public consultation; cost estimates; and other information (e.g. terms of reference for key positions).

27. **Project institutional arrangements (Section 8.3 of the EMP).** This section of the EMP describes the roles and responsibilities of relevant agencies for EMP implementation. For this project, the principal person responsible for EMP coordination is the PIURR Environment Officer (Ms. Shakirova Sharis, Senior Environmental Specialist), acting on behalf of the PIU. On-site implementation of the EMP is by the implementing agencies, contractors, and construction supervision consultants (CSCs).

28. **Project readiness assessment (Section 8.2 of the EMP).** This is the first key step prior to the start of the project civil works, to ensure that preparations for EMP implementation have been completed.

29. **Potential impacts and mitigation (Section 8.6 of the EMP).** This section of the EMP summarizes the potential environmental impacts and mitigation measures for the different phases of the project: detailed design and pre-construction phase; construction phase; and operations phase. Table 70 in the EMP summarizes the environmental risks and mitigation measures, and the agencies responsible for implementation and supervision of these measures. For this project, the key potential impacts and/or issues of concern are: (i) development of a Contractor generated Site Specific Environmental Management Plan (SEMP), (ii) development of sub-plans, (iii) obtaining licenses, permits and agreement, (iv) sub-contractors, (v) Waste and Materials Management Plan (WMMP) including – Spoil Disposal Plan and Asbestos Management Plan, (vi) Soil, Erosion and Topsoil Management Plan, (vii) Water Resources Management Plan including Ground Water Management, and Waste Water Management, (viii) Air Quality Management Plan (AQMP) Including Air Quality Control Plan for tunnels, (ix) Noise and Vibration Management Plan (NVMP) including Pre-Commencement Condition Surveys, (x) Cultural Heritage Management

Plan including Chance Find Procedure, (xi) Biodiversity Management Plan (BMP), (xii) Climate – Resilience Management Plan, (xiii) Landscape and Visual Management Plan, (xiv) Disclosure of project information and community consultation including Stakeholder Engagement Plan, (xv) Contractor Stakeholder Engagement Plan (CSEP), (xvi) Grievance Mechanisms (GM), (xvii) Code of Conduct (CoC), (xviii) Land Acquisition and Resettlement Plan, (xix) Social, Community and Health Review, (xx) Labor and Working Conditions Management Plan (LWCMP) including – Local Employment and Procurement Plan (LEPP), Social Risk Register, Gender Action Plan, (xxi) Traffic Management Plan (TMP), (xxii) Health and Safety Plan including specific measures for the construction of bridges and tunnels, and Health Plan, (xxiii) Emergency Response Plan including – Natural Disaster Response, and Spill Management Plan, (xxiv) Camp Management Plan, (xxv) Concrete and Asphalt Production Management Plans, (xxvi) Construction Plans and Method Statements including Bridge Construction Plan, Tunnel Construction Plan, Tunnel Handover Plan, Slope Stabilization Plan, (xxvii) Method Statements for Temporary Activities including storage areas, river crossings, and roads/access roads, (xxviii) Blasting Management Plan including tunnel specific measures, (xxix) Construction Road Access Management Plan

30. **Training (Section 8.4 of the EMP).** This section of the EMP describes the training program for environmental safeguards, including the recipients and frequency of training.

31. **Consultation and participation plan (Section 6 of the EMP).** This section of the EMP identifies the mechanisms by which consultations will be accomplished (e.g., through workshops, questionnaires, etc.), the frequency of consultations, topics, and target audiences.

32. **Environmental monitoring program (Section 8.8 of the EMP).** The program comprises four types of monitoring: (i) internal monitoring; (ii) external monitoring; (iii) compliance monitoring; and (iv) independent compliance monitoring. Internal monitoring is assessment by the project implementation units (PIUs) and/or CSCs to ensure the contractors are implementing mitigation measures as described in their contractual arrangements and EMP. External monitoring is the measurement of specific environmental variables (e.g. air quality, dust levels, noise emissions) to ensure that the construction activities do not exceed the legal parameters and standards specified for the project. Compliance monitoring is the overall assessment of whether all EMP measures are being complied with and is conducted by the PIU Senior Environment Specialist. This monitoring does not involve quantitative measurement of environmental variables, but is based on visual inspection, site visits, and review of the progress reports for internal and external monitoring. Independent compliance monitoring is the same as compliance monitoring, but which is being conducted by an entirely independent agency. This additional monitoring is being conducted due to the project's status as safeguard category "A" for the environment under ADB's Safeguard Policy. The independent compliance monitoring comprises a combination of quantitative measurement of selected variables (to verify the results of the external monitoring) and visual inspections, site visits, and review of available reports (to verify the results of the internal, external, and compliance monitoring).

33. **Costs (Section 8.9 of the EMP).** This section of the EMP describes the estimated costs for EMP implementation over 4.25 years. The cost estimates in the EMP include the costs for mitigation measures, training, and monitoring.

34. **Reporting (Section 8.5 of the EMP).** This section of the EMP describes the reporting requirements for the project, including the responsible agencies and reporting frequency.

III. ENVIRONMENTAL MANAGEMENT DURING THE REPORTING PERIOD

35. This section summarizes the assessment of the EMP implementation for the project during the current reporting period (July – December 2025).

1. Implementation of the project mitigation measures

36. Implementation of the mitigation measures in the EMP is summarized in Table 4. This table is the same as Table 70 of the EMP but has three additional columns, to summarize the implementation status and compliance for each listed mitigation measure within the reporting period.

Table 4: Project Impacts, Mitigation Measures, and Implementation Status

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
Pre-construction and construction				
1	Development of a Contractor generated Site Specific Environmental Management Plan	1. The Contractor shall prepare a SSEMP (A suggested Table of Contents for a SSEMP is presented in Table 74 of the EIA).	Based on Consultant's letter 550-OBG-486: SSEMP (Main Report) was conditionally approved on 13 October 2021. Subplans were submitted and approved on 10 May 2022. The SSEMP and associated sub-plans were further reviewed and updated in 2022 based on appropriate mitigation measures applied at specific work sites in accordance with risks identified. The Contractor submitted the updated SSEMP on 30 September 2022, which was reviewed and approved by CSC's IES and PIURR in December 2022.	Yes
		2. SSEMP is approved by the Supervising Engineer, and the PIURR. Included plans are also approved by the Supervising Engineer, and the PIURR.	The Contractor submitted the updated Waste Materials and Management Plan including a Spoil Disposal Plan and Asbestos Management plan, which was reviewed and approved by the Consultant in December 2022. The following sub-plans are being updated: (i) 16 spoil disposal sub-plans in April 2023, (ii) Waste Materials and Management Plan including measures regarding the management of hazardous waste in May 2023, (iii) method statements considering work safety issues, access roads and management of stockpiles in April 2023.	Yes
		3. The Contractor will implement the Environmental and Social Management System (ESMS) in line with national and international Environmental and Health	Submission of the Safety Management Plan, and Health Protection Management Plan	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		and Safety System (EHSS) Standards.		
		4. The SSEMP will include a review of the capacity of local emergency services.	The topic is discussed marginally in the Emergency Response Plan approved on 25 November 2021. The capacity of local emergency services is sufficient for the needs of Project Site. Updated the Emergency Response Plan in May 2023.	Yes
		5. The Contractor will also prepare a Social Risk Register, which will include any specific plans/programmes required as a result of the Community and Health Review.	Social Risk Register is implemented through at least semi-annual meetings, the progress of which is monitored by the CSC and Employer at site.	Yes
2	Development of sub-plans	6. Prior to start of site works, the Contractor shall prepare the following plans in line with the Lenders environmental and social requirements (a hierarchy of Sub-plans is presented in Table 75 of the EIA):	The Contractor updated Waste Materials and Management Plan including a Soil Disposal Plan and Asbestos Management plan, which was reviewed and approved by the Consultant/PIURR in December 2022. The Contractor submitted the updated Waste Materials and Management Plan including a Spoil Disposal Plan and Asbestos Management plan, which was reviewed and approved by the Consultant in December 2022. The following sub-plans are being updated: (i) 16 spoil disposal sub-plans in April 2023, (ii) Waste Materials and Management Plan including measures regarding the management of hazardous waste in May 2023, (iii) method statements considering work safety issues, access roads and management of stockpiles in April 2023.	Yes
3	Obtaining licenses, permits and agreement	7. All necessary licenses and permits must relation to environmental, safety and labor must be obtained prior to starting the activity that they apply to. (Further Details in Ref 3 of the EMP)	All licenses/permits are checked by the CSC and Employer at sites for the Contractor's current permits.	Yes
		8. A database tracking all permits and consents shall be developed and maintained.	All records are kept at the site office.	Yes
		9. If the Contractor decides to run an asphalt production facility, then this must be discussed and agreed with the CEP.	The site was screened and assessed for the asphalt production plant prior to its operation.	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		A screening exercise may be required.		
		10. If the Contractor decides to establish its own quarry or borrow pit – an appropriate license must be obtained from the CEP. Otherwise, material must be purchased from licensed providers.	Obtained Quarry Permit (No. 175) for specified location in Hukumat, dated 12 August 2021.	Yes
		11. Maximum allowable concentration of substances discharged into the surface water body must be agreed with (approved by) the CEP. Volume of water abstraction, and sources, must be agreed with the CEP.	No cases of excess discharge of unallowed substances.	Yes
4	Sub-contractors	12. Provisions will be incorporated into all subcontracts to ensure compliance with lender requirements, Tajik legislation and the SSEMP and its associated sub-plans at all tiers of the sub-contracting (Further Details in Ref 4 of the EMP)	SSEMPs and sub-plans are essential in all subcontracts which are monitored timely by the CSC.	Yes
		13. All environmental, social and safety requirements for the Contractor will apply to the sub-contractors. This will be secured via contracts. It is the responsibility of the Contractor to audit sub-contractors and ensure compliance.	The subcontractor made a regular repair of the sedimentation ponds to store wastewater before releasing on the river.	Yes
		14. All Project sub-contractors will be supplied with copies of the SSEMP, and sub plans. All relevant requirements of the SSEMP and sub-plans must be communicated to sub-contractors.	Provided to the Contractor.	Yes
		15. All subcontractors will be required to appoint a safety representative who will be available on the Site throughout the operational period of the respective subcontract, unless the Supervision Engineers approval for the Contractor's safety	All subcontractors have appointed a safety representative.	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		representative to undertake take this role, is given in writing.		
5	Waste and Materials Management Plan (WMMP) including - Spoil Disposal Plan - Asbestos Management Plan	16. Contents of WMMP should be provided by Contractor in his own Sub-Plans (Further Details in Ref 5 of the EMP)	All necessary improvements are timely requested and monitored by the CSC and Employer. The Contractor updated the Waste Materials and Management Plan in July 2022, which was reviewed and approved by the Consultant in December 2022. Further, Waste Materials and Management Plan including measures regarding the management of hazardous waste was updated in May 2023.	Yes
		17. The WMMP will identify the location of any borrow-pits required by the project, including the volumes required and the locations that the materials will be used.	There are no borrow pits in use.	Yes
		18. Prior to commencement, the Contractor will need to confirm disposal procedures for non-hazardous waste, including obtaining the required permits, securing agreements with any waste companies, and establishing management processes.	The Project secured permission to remove construction and household waste for storage in specially designated areas (disposal areas).	Yes
		19. Prior to commencement of works, agreement(s) with company / companies authorized for utilization or disposal of hazardous waste must be signed. If none are available, measures for the selection of suitable sites, and processes for the safe disposal of hazardous waste must be set out and implemented.	The Contractor updated the Waste Materials and Management Plan to include measures for managing hazardous waste in May 2023.	Yes
		20. Agreements with waste management companies must be kept active.	Contracted with a solid waste collector started on 12 September 2021 until the project completion stage.	Yes
		21. The contractor is responsible for auditing all waste companies they have an agreement with, and reviewing their documentation and working practices, including environmental	Contracted with a solid waste collector started on 12 September 2021 until the project completion stage.	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		and safety performance twice per year.		
		22. The Construction Camp Management Plan must include waste disposal measures, including: - the regular collection and disposal of household waste. - Provide bins and facilities within the project site for temporary storage of all waste streams. These facilities should be designed to prevent the escape of litter, liquids, odors, or other contaminants / nuisance emissions. - Train staff in best practice for waste minimization and management.	Included in the updated WMMP.	Yes
		23. A Spoil Disposal Plan will be developed based on site specific topo-geodetic, geotechnical, hydrological data, environmental and social data. The plan shall include: - information on location and layout of the spoil disposal areas (dimensions, slope angle) with 3D view and cross sections; - surface water runoff management and bank protection measures; - land rehabilitation and re-cultivation measures; - designation of suitable transport routes and schedule for spoil truck movements to minimize traffic disruption/ congestion, and - environmental mitigation measures to minimize impacts during transport, storage, and disposal of spoil, including using covering truck.	Updated 16 Spoil Disposal Sub-plans in May 2023	Yes
		24. Each site will be subject to a screening process (Elements for a screening process are identified in Table 53 of the EIA)	Screening process for 16 identified spoil disposal sites following 12 elements stated in the Project's EIA.	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		25. The spoil disposal plan must be developed in association with a biodiversity specialist and the Forestry State Department. The plan must specify spoil dewatering procedures (and facilities), as necessary, and describe mitigation measures to ensure adequate treatment of wastewater prior to disposal.	Confirmation of no impact on protected areas (none currently identified in EIA)	Yes
		26. An asbestos management plan (AMP) will be developed that describes processes for the identification of asbestos and for management and safe disposal of any asbestos containing materials found during construction works.	The guidance for identification of asbestos materials in the project is found in Table of the AMP.	Yes
		27. Asbestos is prohibited from being used at any stage during the project. Any existing material that may be present will be managed to minimize the potential environmental, health and social risks.	No asbestos material is found in the tunnel and exaction sites.	Not applicable
		28. Do not break asbestos/asbestos containing articles when dry.	No asbestos material is found in the tunnel and exaction sites.	Not applicable
		29. Equip staff handling asbestos with protection clothing, goggles, respirators, rubber boots.	No asbestos material is found in the tunnel and exaction sites.	Not applicable
		30. Place materials in thick, durable plastic bags. Wrap the bags and mark with asbestos warning mark.	No asbestos material is found in the site	Not applicable
		31. Engage specialist contractor for removal-disposal of asbestos/asbestos containing material to a licensed waste management facility	No asbestos material is found in the tunnel and exaction sites.	Not applicable
6	Soil, Erosion and Topsoil Management Plan	32. Contents of Soil, Erosion and Topsoil Management Plan should be provided by Contractor in his own Sub-Plans (Further Details in Ref 6 of the EMP)	With an approved sub-plan	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		33. Unwanted materials from topsoil such as roots of trees, rubble and waste removed prior to stockpiling.	The Contractor updated Soil, Erosion and Topsoil Management Plan in June 2023.	Yes
		34. Stockpiles of removed topsoil must be properly designed/shaped and managed, – stability of the stockpile will be achieved through preservation of “safe” slope inclination and diversion of surface water runoff from the area. Soil stabilization Best Management Practices such as mulch, soil binders, plastic sheeting or erosion control blankets must be used to protect bare soil.	Cleaned up by the Contractor prior to stockpiling	Yes
		35. To ensure stability, the soil piles shall not be higher than 2 meters, with a slope gradient of less than 25%. The piles must be placed and managed so as to avoid erosion and washing off. Drainage trenches must be established to divert surface runoff from the site.	The Contractor made method statements for all temporary stockpiles over 100 m ³ in June 2023.	Yes
		36. Soil compaction will be reduced by strictly keeping to temporary roads, construction camp/construction area boundaries.	The Contractor made method statements for all temporary stockpiles over 100 m ³ (May 2023).	Yes
		37. Embankments and slopes with disturbed vegetation must be replanted immediately after the construction/disturbance stops, and before it rains – or if not covered with gabion baskets, fiber rolls, gravel bags or plastic sheets. Native species must be used for any replanting, fiber mats should be used to encourage vegetation growth and temporary fencing used to protect plants from being grazed.	Placed in the designated spoil disposal areas. A replanting plan (schedule of activities) for 10,000 trees was drawn up (ratio 1:5) and submitted to the CSC and PIU in April 2023.	Yes
		38. Contractor will confine operation of heavy equipment within the area of works to avoid soil	A replanting plan (schedule of activities) for about 10,000 trees was drawn up (ratio 1:5) and	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		compaction and damage to privately owned land. If private lands are disturbed, the contractor should promptly inform the owner and agree on ways to remedy the situation.	submitted to the CSC and PIU in April 2023. As of June 2025, approximately 10,000 seedlings have been planted at various locations along the project alignment. In addition, around 200 seedlings or trees have been replanted to replace those that previously failed to survive.	
7	Water Resources Management Plan including: - Ground Water Management - Wastewater Management	39. Contents of Water Resources Management Plan should be provided by Contractor in his own Sub-Plans (Further Details in Ref 7 of the EMP)	Provided to the sub-contractors	Yes
		40. Minimize water usage in the first instance, and also opportunities for reuse of water where possible.	Water resources and uses are not an issue in the project. Local villagers have their own water connection. Water resources audit across the project road was conducted between Jan 2024 and Jun 2024.	Yes
		41. The Contractor will undertake a capacity study of available water resources along the alignment, including the location and quality of water resources used by the villages, to identify suitable resources, with sufficient availability to avoid any impact on the availability of resource to communities and businesses along the alignment. If existing groundwater or surface water resources are not appropriate (quantity or quality), alternative sources of water will be identified by the Contractor, to ensure the available resources used by the local communities are maintained at all times, including rapid provision of alternative temporary supplies in the event of disruption to usual supply.	It requires proper documentation of the water system utilities of the villages along the route. Documentation of the water system utilities of the villages along the route in various sections is already completed in June 2024.	Yes
		42. A review and audit of all water pipes along the route will be undertaken prior to commencement of works, to identify all	Documentation of the water system utilities of the villages along the route in various sections is already completed in June 2024.	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		existing water sources used by the communities near the alignment.		
		43. Pipes/ culverts will be included within the design of the road, at the location of existing water resources. This will ensure that local villagers will not need to cross the new road to access water. The local communities will be consulted to inform the audit results and ensure that all the proposed new pipes/ culverts are in the correct locations.	The Project installed concrete and steel casings under asphalt roads or road under construction that can access pipes on the other sides.	Yes
		44. The Contractor will liaise with the community to understand seasonal water demand constraints, and periods of high-water volumes / increased erosion.	The Contractor, through its environmental and social officers, has discussions oftentimes with the community during surface water measurement related to the water quality, quantity, and timing of distribution.	Yes
		45. Water abstraction should be designed in accordance with the requirements of the Biodiversity Management Plan to minimize impacts to habitats reliant upon surface and ground water.	Included in any design consideration.	Yes
		46. All temporary fuel tank and storage areas must be located at least 100 m away from any surface water body and outside any flood plain.	Tanks are properly situated away from natural waterways.	Yes
		47. Any temporary fuel tanks (if contractor requires small stock of fuel on the site) shall be placed in a secured, covered area with berms or dikes to contain any spills.	Constructed cemented berm to contain any spills.	Yes
		48. Capacity of containment must be 110% of capacity of the tank. Any spill shall be immediately contained and cleaned up with absorbent material as per the Spill Management Plan.	Being considered during the project implementation.	Yes
		49. Discharge of any untreated water into the surface water body must be strictly prohibited. Treated water discharge must comply with	Septic tanks are regularly monitored by the CSC and the Contractor environmental staff. Secured a permission for the special use of water from the	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		International Finance Corporation (IFC) and EU standards for effluent discharge, as well as national standards and any license / permit requirements.	Layron and Lugur rivers for production and the Dzhavji and Kandak Springs for household facilities of "Hunan Road and Bridge Construction Group Company Limited" in the Republic of Tajikistan (No. 224 from 13 February 2021 to 13 Sep 2024). A 3-level sedimentation tank was constructed for wastewater treatment at km 11+300.	
		50. Discharge of cement contaminated water must be avoided as cement pollution results in high alkalinity and raises the pH, which can be toxic to aquatic life.	pH levels at all batching plants are still with threshold levels at this reporting period. A 3-level sedimentation tank was constructed for wastewater treatment at km 11+300.	Yes
		51. Washing out concrete trucks at construction sites will be prohibited unless specific concrete washout areas are provided for this purpose at the construction site (e.g., a bridge site). The washouts will be impermeable and emptied when 75% full. The removal of water will be in line with the requirements of the Water Resources Management Plan.	Implemented during its construction stage.	Yes
		52. Runoff control measures can be installed at the time of road/highway construction to reduce runoff pollution.	Improvement of the drainage canals to reduce runoff pollution.	Yes
		53. To prevent runoff contamination, paving should be performed only in dry weather.	Paving has been performed only in dry weather.	Yes
		54. In disturbed soil areas silt fence, fiber rolls (biodegradable logs), gravel bags, or other approved sediment control must be ensured. At a minimum, bare soil (whether it is an abutment slope or a stockpile) must be protected before it rains.	Gravel bags, tree branches and twigs are used as a runoff control measure.	Yes
		55. Soil stabilization Best Management Practices such as mulch, soil binders, plastic sheeting or erosion control	The Contractor has been working terraces on a slope along the project alignment as part of its scope of work.	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		blankets must be used to protect bare soil.		
		56. Store materials in suitable containers, with clear legible labels. The same applies to containers for short term storage of used oil.	Complaint	Yes
		57. Ensure availability of spill clean-up materials (e.g., spill kits, etc.) in the areas where accidental spills may occur.	Immediate clean-up of any affected area.	Yes
		58. Prohibit discharge of any untreated potentially contaminated effluents.	Complaint	Yes
		59. Provide septic tanks for the camp sites servicing less than 150 employees. Contract authorized company to remove the liquid waste regularly. For larger sites, primary treatment in anaerobic tank or pond preceded by a bar screen to remove large solid objects will be required.	Complaint	Yes
		60. All camp sewage treatment plants will be managed in accordance with manufacturer's instructions by competent personnel, and discharges regularly monitored. If discharges cannot be treated to an acceptable standard, liquid wastes must be removed by an authorized company and disposed in an environmentally responsible manner in accordance with the Waste and Materials Management Plan.	Complaint	Yes
		61. Septic tanks necessary at construction camp(s) shall be made of impermeable material and will be emptied regularly in accordance with applicable rules.	Complaint	Yes
		62. Treatment sludges and the contents of any septic tanks must also be removed by an authorized company and disposed in an	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		environmentally responsible manner.		
		63. Surface water bodies/ rivers will only be crossed via bridges.	All bridges were constructed based on the approved project designs and alignment.	Yes
		64. Ensure that liquid wastes are removed by an authorized company and disposed in an environmentally responsible manner in accordance with the Waste and Materials Management Plan. Keep an ongoing contract with authorized company responsible for removal of the liquid waste. If the camp is equipped with a sewage treatment plant this must be operated and maintained according to manufacturer's instructions.	The Contractor updated the WMMP to include information relating to the management of hazardous waste, storage areas, handling, and disposal (May 2023).	Yes
8	Air Quality Management Plan (AQMP) Including Air Quality Control Plan for tunnels	65. Contents of AQMP should be provided by Contractor in his own Sub-Plans (Further Details in Ref 8 of the EMP)	With an approved sub-plan	Yes
		66. Prior to commencement of works, likely emissions from crushers, concrete production facilities and other emissions generating activities must be calculated and agreed with the CEP. A separate plan/schedule for air quality control in the tunnel must be provided.	Based on the permission received on 24 September 2021 with Registration No. 275/13	Yes
		67. Ensure all machinery and vehicles are maintained to minimize exhaust emissions. Vehicles and equipment that emit smoke will not be used and, if they cannot be fixed, shall be removed from the project.	Complaint	Yes
		68. Undertake immediate repairs of any malfunctioning construction vehicles and equipment.	Complaint	Yes
		69. Use construction equipment and vehicles that meet national emission standards.	Complaint	Yes
		70. Wherever possible, use electrically powered	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		equipment rather than gas or diesel-powered equipment.		
		71. Use fuel efficient machinery.	Complaint	Yes
		72. Ensure that all diesel and petrol running machinery use is equipped with catalytic convertors.	Complaint	Yes
		73. Position any stationary emission sources (e.g., portable diesel generators, compressors, etc.) as far as is practical from sensitive receptors.	Complaint	Yes
		74. Locate support facilities and spoil disposal sites to reduce trip numbers and travel distance – as far as feasible.	Complaint	Yes
		75. Provide truck-washing facilities at tunnel portals and at safe distance from bridge construction sites to prevent track-out of mud and dust.	Complaint	Yes
		76. Implement a regular vehicle maintenance and repair program, utilizing the manufacturer recommended maintenance programs.	Complaint	Yes
		77. All trucks used for transporting materials to and from the site will be covered with canvas tarpaulins.	Complaint	Yes
		78. Carry out watering for dust control at least 3 times a day: in the morning, at noon, and in the afternoon during dry weather with temperatures of over 25°C, or in windy weather. Avoid overwatering as this may make the surrounding muddy.	Complaint	Yes
		79. Ensure compliance with the Water Resources Management Plan, including maintenance of resources used by the local communities at all times, including rapid provision of alternative temporary supplies in the event of disruption to usual supply.	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		80. Earthwork operations to be suspended when the wind speed exceeds 20 km/h (based on on-site monitoring) in areas within 500 m of any community.	Complaint	Yes
		81. Provide vegetation planting along roadsides to stabilize soils and reduce air quality impacts.	Replanting activities are in place. As of June 2025, approximately 10,000 seedlings have been planted at various locations along the project alignment. In addition, around 200 seedlings or trees have been replanted to replace those that previously failed to survive. An approved contract agreement has been established with Palma Farm Nursery for the supply and planting of seedlings at the site.	Yes
9	Noise and Vibration Management Plan (NVMP) including Pre-commencement Condition Surveys	82. Contents of Noise and Vibration Management Plan (NVMP) including Pre-Commencement Condition Surveys should be provided by Contractor in his own Sub-Plans (Further Details in Ref 9 of the EMP)	With an approved sub-plan	Yes
		83. Undertake condition surveys no later than 28 days before the commencement of construction works. The NVMP will set out the process for this. The Contractor and the Engineer will carry out joint condition surveys of all buildings within 25 meters of the road alignment that, in the opinion of the Engineer, might be affected by vibration resulting from the Contractor's construction operations. The surveys shall be conducted in the presence of and with the permission of the property owners.	Complaint	Yes
		84. The findings of the building condition surveys shall be recorded in the reports and will contain the following information, as a minimum:	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		- Building address and location; - A description of the building condition and any cosmetic and/or structural damage; - Sketches and photographs showing the location and extent of any damage; - High resolution video recordings of the surveyed buildings; and - Verification of the report by the building owner.		
		85. The NVMP will set out the need to undertake further refined noise modelling to determine the specification and precise locations of the proposed noise barriers.	Complaint	Yes
		86. The NVMP shall provide details of mitigation measures, specific location, and schedule where such measures shall be implemented to minimize impacts to sensitive receptors due to the presence of the camp, construction works, sourcing and transport of construction materials, and other project-related activities.	Complaint	Yes
		87. Use well maintained construction equipment and vehicles.	Complaint	Yes
		88. Use construction equipment and vehicles fitted with appropriate noise suppression. Fit all pneumatic tools with an effective silencer on their air exhaust port.	Complaint	Yes
		89. Use temporary noise barriers while working in sensitive locations if allowable noise limits are expected to be exceeded.	Complaint	Yes
		90. Impose speed limits on the project vehicles to minimize noise emission while moving along/across the sensitive areas.	Complaint	Yes
		91. Keep to no horn policy unless vitally necessary.	Complaint	Yes
		92. As much as possible, use quiet equipment and	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		working method: e.g., diesel hammer piling – substituted with drill piling or hydraulic piling.		
		93. Whenever possible: enclose noisy equipment, restrict non-stop operation of noisy equipment, avoid simultaneous operation of noise generating equipment.	Complaint	Yes
		94. Consider seasons sensitive for birds and other wildlife while planning noise generating works, with cross reference to the biodiversity management plan.	Complaint	Yes
		95. Train staff in best practice for noise reduction and mitigation.	Complaint	Yes
		96. Inform the community on schedule and duration of construction activities, particularly where these are likely to generate high noise levels.	Complaint	Yes
		97. Implement 24-hour community complaints hotline.	All construction camps are open 24 hours and 7 days a week for any community complaints. There are also boxes for complaints in each camp. GRM billboards are reinstalled at entry and exit points and outside the construction sites of the Road Project.	Yes
		98. Limit truck speed - not to exceed 40 km/h, when driving through communities, and not to exceed 80 km/h when driving on highways.	Complaint	Yes
		99. Time and Activity Constraints, i.e., operations will be scheduled to coincide with periods when people are least likely to be affected; construction work hours and workdays will be limited to less noise-sensitive times. Hours-of-work will be approved by the Engineer having due regard for possible noise disturbance to the local residents or other activities.	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		100. Construction activities will be strictly prohibited between 10 PM and 6 AM near residential areas. When operating close to sensitive areas (within 250 m) such as residential, nursery, or medical facilities, the Contractor's hours of working shall be limited to 8 AM to 6 PM.	Complaint	Yes
		101. Noise protection kits such as ear plugs, earmuffs, will be provided for workers who are working in areas where noise levels are higher than 80 dB(A), and made available to all workers on request, regardless of noise level. Mandatory use of hearing protection will be required at noise levels over 85 dB(A)	Complaint	Yes
		102. The plan shall detail the procedures for noise and vibration surveys, monitoring, and control. Such details shall include; - procedures to complete condition surveys. - Measurement locations and methods; - Method statements for works likely to induce noise and vibrations, including programs of trial construction sections to determine the likely magnitude of noise and vibrations at defined distances from the vibration source, in sufficient detail for the contractor to develop a final method for constructing the works without excessive vibration; - Description of the instrumentation and equipment to be used; - Copies of the instruction manuals and the laboratory calibration and test equipment certification; - The resumes of the vibration monitoring technical support.	Corrective actions were made: (i) ensured that noise monitoring is conducted using a Class 1 noise meter calibrated according to manufacturer's specifications and according to averaging periods set in the EIA starting January 2023, and (ii) updated the vibration monitoring methodology using displacement velocity (started in April 2023).	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		103.The Contractor must respond to any noise and vibration grievances and implement remediation measures as soon as practical in line with the Stakeholders' Engagement Plan (SEP) and GRM.	No grievances received related to noise and vibration during this reporting period.	Yes
10	Cultural Heritage Management Plan including Chance Find Procedure	104.Contents of Cultural Heritage Management Plan including Chance Find Procedure should be provided by Contractor in his own Sub-Plans (further Details in Ref 10 of the EMP)	With an approved subplan.	Yes
		105.Monitoring of vibration effects adjacent to sensitive receptors such as mosques will be undertaken in accordance with the NVMP.	Complaint	Yes
		106.The boundaries of the worksite will be strictly observed.	Complaint	Yes
		107.The Plan will include induction training for workers on chance finds. The plan will include a chance finds Procedure, detailing the actions to be taken if buried archaeology or other heritage items are discovered during construction activities. This will include immediate stoppage of works and notification of the Ministry of Culture and/or other relevant authority. Works would only be allowed to proceed in accordance with any instructions from the authorities.	Complaint	Yes
11	Biodiversity Management Plan (BMP)	108.The Contractor will develop a Biodiversity Management Plan covering actions to safeguard, conservation of biodiversity on the influence territories or specific sites that tend to be affected due to the planned activity. Compliance with the plan will be responsibility of Contractor and an	With an approved subplan	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		Ecological Clerks or Works (ECoW).		
		109.Hire a suitable number of suitably qualified ECoW to both map and clear the route and approve that the route is approved as clear of biodiversity constraints, in advance of construction works.	Complaint	Yes
		110.They should include identification of areas of greatest ecological value, features/species needing translocation, bird nesting areas where schedules need to be altered, etc. Their responsibility will include both surveys to inform the development of additional mitigation (if required) such as bat surveys and other species-specific surveys, and surveys to help ensure that specific mitigation is applied within the project Right of Way (RoW) in advance of vegetation clearance.	Complaint	Yes
		111.Mark and keep to the boundaries of the project area and the temporary sites.	Complaint	Yes
		112.Replace trees were lost as part of the Project (5 to 1 replacement ratio).	10,000 seedlings are already planted at various locations along the project alignment. Approximately 200 seedlings were replanted to replace those that had previously failed to survive. An approved contract agreement was established with Palma Farm Nursery for the supply and planting of seedlings at the site.	Yes
		113.No removal of vegetation outside the mentioned boundaries.	Complaint	Yes
		114.Prohibit shortcuts by workers, pedestrians, and vehicles to avoid impact on the vegetation.	Complaint	Yes
		115.Reinstate disturbed sites immediately after completion of works.	Complaint	Yes
		116.Restore vegetated areas with diverse plants/seed mix of local/regional provenance.	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		117.Prohibit use of herbicides/chemical during vegetation clearance.	Complaint	Yes
		118.Brief the staff in vegetation protection issues during site induction.	Complaint	Yes
		119.Brief staff in relation to biosecurity measures (in particular invasive species).	Complaint	Yes
		120.The BMP will also include specific actions to be implemented through the lifetime of the project to further enhancement of biodiversity in the area. These actions will have associated monitoring commitments to ensure long-term effectiveness/relevance.	Complaint	Yes
		121.Use low wattage lamps directing light downwards	Complaint	Yes
		122.Preserve vegetation in the areas outside the boundaries of the project sites.	The project includes the care and maintenance of trees located outside its designated right of way.	Yes
		123.Adhere to no horn policy to avoid disturbance of wildlife.	Complaint	Yes
		124.Impose speed limits on the project vehicles to minimize risk of road kills.	Complaint	Yes
		125.Fence trenches or pits to avoid entrapping and injuries of the fauna species. Bright colored ribbons may be used for big animals (e.g., cattle), while metal plastic and other shields/fences may be used for small animals.	Complaint	Yes
		126.Upon completion of the shift put planks or medium size twigs in the trenches to allow small animals to escape.	Complaint	Yes
		127.Check pits and trenches prior to filling up.	Complaint	Yes
		128.Unless advised otherwise by a ECoW, tree-felling should be timed to avoid bat roosting and bird nesting seasons. Where a tree is identified as having the potential to support such features,	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		falling/removal should only take place between mid-July and mid-September. In case bat roosts are found, arrangement of bat boxes can be considered as mitigation measure. Implement tree felling/house demolition works from late September till mid-November to avoid impact on bats and breeding birds (nesting/hatching).		
		129. Where relevant, implement monitoring of water quality (visual detection of turbidity increase, analysis - upstream and downstream the worksite).	Complaint	Yes
		130. Implement mitigation measures set for preservation of water quality and bank erosion (soil stability).	Complaint	Yes
		131. Where there are permanent and temporary ponds, efforts will be made to maintain them during the breeding season. The measures to prevent construction works extending beyond the construction boundary are anticipated to prevent disturbance to ponds outside the construction area.	Complaint	Yes
		132. All staff to comply with Code of Conduct.	Complaint	Yes
		133. The BMP will be linked to the Landscape Management Plan, with regards to land restoration and selection of suitable species.	Complaint	Yes
12	Climate – Resilience Management Plan	134. Contents of Climate – Resilience Management Plan should be provided by Contractor in his own Sub-Plans (Further Details in Ref 12 of the EMP)	With an approved subplan	Yes
		135. Ensure that the temporary works (e.g., access roads) do not decrease climate	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		resilience of permanent works as contained in the tender specification		
		136.Ensure that surfacing materials are adequately specified accounting for anticipated climate change.	Complaint	Yes
		137.Ensure that the drainage system has sufficient capacity for intense rainfall events.	Complaint	Yes
		138.Ensure that the Road is protected against slope instabilities that substructures and foundations have sufficient resistance to changes in ground parameters	Complaint	Yes
		139.Ensure that expansion joints have sufficient margin for anticipated climate change.	Complaint	Yes
		140.Ensure that bearings have sufficient margin for anticipated climate change	Complaint	Yes
		141.Ensure that surfacing materials are adequately specified	Complaint	Yes
		142.Ensure that elements can be replaced at a later date but more resilience components	Complaint	Yes
		143.Ensure that the bridges allow for high wind loading	Complaint	Yes
13	Landscape and Visual Management Plan	144.Contents of Landscape and Visual Management Plan should be provided by Contractor in his own Sub-Plans (Further Details in Ref 13 of the EMP)	With an approved subplan	Yes
		145.Use low wattage lamps directing light downwards at work sites and camps.	Complaint	Yes
		146.Ensure all lighting related to construction activities shall be shielded or directed to restrict any direct illumination onto property located outside of the Project Site boundaries.	Complaint	Yes
		147.All construction site lighting shall be turned off when construction	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		activities have ceased for the day.		
		148. In the design, the designers will: - Avoid using non-native plant species. - Replace trees were lost as part of the Project (5 to 1 replacement ratio). - Ensure new lighting does not result in light spill/ light pollution. - Choose colors of above ground sections of new buildings and at tunnel exits so they merge with environment. - Give priority to use of geotextile against shotcrete. - Use irregular shape stones for rubble. - Avoid use of white concrete. - Use full horizontal cut off glass lens luminaires, installed at 0° uplift. - Where possible use lower lamp heights, provided it does not compromise safety aspects, such as the need to see road signs.	Complaint	Yes
		149. To prevent future pollution issues, it is recommended that the use of sodium light bulbs is prohibited and that Light Emitting Diode (LED) lights are installed with a "neutral" color temperature of 4000K.	Complaint	Yes
14	Disclosure of project information and community consultation Stakeholder Engagement Plan	150. Contents of Disclosure of project information and community consultation Stakeholder Engagement Plan should be provided by Contractor in his own Sub-Plans (Further Details in Ref 14 of the EMP)	With an approved subplan	Yes
		151. A Community Liaison Officer (CLO) shall be appointed to manage consultations and implement the developed Stakeholder Engagement Plan (SEP) with local communities.	The Contractor has a Community Liaison Officer for the project.	Yes
		152. Organize consultation events for men, women	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		and children and disclose information about the construction impacts, health and safety, scheduling, and timeframes.		
		153. Conduct a meaningful consultation with the affected vulnerable groups to identify the best solution to improve their livelihood; or provide an alternative living area for them.	Complaint	Yes
		154. Focus groups are preferred methods for engagement with this group. Separate males and females focus group discussions should be conducted. In particular, women must be consulted on construction and road safety, and given fair and equal representation of women in decision-making situations and greater awareness of road safety from a perspective.	Complaint	Yes
		155. Data to be collected on construction and road safety from a gender perspective in the region and results communicated.	Complaint	Yes
		156. Develop outreach and campaign promoting gender-responsive road safety. This includes focusing on risks for women and children through an enhanced approach to safety inclusive of security dimensions and understanding masculinities and men's behaviors in relation to road safety so as to better target potential campaigns.	Complaint	Yes
		157. Provide regular updates on the Project website and at Project milestones. If required, engage the media in disseminating Project information and manage public relations in case of NGO interest.	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		158. Update SEP on an annual basis throughout the Project as per Project Requirement 10.	SEP was updated and approved in May 2022. Another update was made in May 2023	Yes
15	Contractor Stakeholder Engagement Plan (CSEP)	159. Contents of CSEP should be provided by Contractor in his own Sub-Plans (Further Details in Ref 15 of the EMP)	With an approved sub-plan	Yes
		160. Establish and communicate a grievance redress mechanism (GRM), as described in the EIA disclosure package, to communities in the project impact zone, building on the GRM in the SEP;	Complaint	Yes
		161. Set-up and publicize a 24-hour hotline for complaints;	Complaint	Yes
		162. Ensure that names and contact numbers of CLOs within the PIURR, Jjamoats, villages and within the PIURR contractor's organization are placed on the notice boards outside the construction site; complete on-going consultation with men, women, and children during construction; and	Complaint	Yes
		163. Keep a log of all complaints received	Complaint	Yes
		164. The plan will outline the need to repair community facilities if damaged as a result of the works as soon as practicable.	Complaint	Yes
		165. Contractor SEP to be updated on annual basis throughout the Project as per PR10.	SEP was updated and approved in May 2022. Another update was made in May 2023.	Yes
16	Grievance Redress Mechanisms (GRM)	166. Prior to start of work, the Contractor shall establish and communicate a Grievance Redress Mechanisms (GRM), as described in the EIA and their own CSEP, to communities in the project impact zone and to their worker and sub-contractors.	With the approved GRM and the contents are provided by the contractor in its own sub-plan	Yes
		167. Prior to start of works, the Contractor shall set-up and publicize a 24-hour hotline for complaints	Compliant	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		168. Prior to start of works, the Contractor shall ensure that names, genders, and contact numbers of representatives of the PIURR and contractors are placed on the notice boards outside the construction site.	Compliant	Yes
17	Code of Conduct (CoC)	169. The Contractor shall prepare a code of conduct that enshrines the commitment of the project to meet Lender's employment and labor standards. Environmental and social protection and anti-bribery and corruption controls.	With the approved subplan	Yes
		170. Ensure measures outlined in specific management plans (Biodiversity Management Plan, Waste and Materials Management, Water Resources Management Plan etc.) are referenced within the CoC.	Complaint	Yes
		171. All workers will be briefed on the Code of Conduct at the moment of recruitment, explaining ways of monitoring and consequences in case of violation.	Complaint	Yes
		172. Appropriate attire for men and women – for health and safety and cultural reasons	Complaint	Yes
		173. Community relations and sensitivities	Complaint	Yes
		174. Hygiene/ Health	Complaint	Yes
		175. Rules related to alcohol and drug use;	Complaint	Yes
		176. Equal opportunities and gender-sensitive conduct	Complaint	Yes
		177. Banned activities – no hunting/ poaching, no picking of berries / fruit / seeds or medicinal herbs	Complaint	Yes
		178. Non-discrimination	Complaint	Yes
		179. Special attention will be given to the prevention of gender-based violence and the promotion of a gender-sensitive working environment on construction sites, in line with the Local	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		Employment Plan (LEP) and attached Gender Action Plan (GAP). A specific training session will be delivered on the Code of Conduct provisions on sexual harassment, abuse, and exploitation at the moment of induction.		
18	Land Acquisition and Resettlement Plan	180. Prior to construction, develop a Land Acquisition and Resettlement Plan (LARP) that includes the alignment, the access roads to the new alignment and the planned construction access roads before any related land take and restrictions to accessing livelihoods take place.	Land Acquisition and Resettlement Plan that includes the alignment, access roads to the new alignment and the planned construction access roads before any related land take and restrictions to accessing livelihoods take place. With the approved subplan	Yes
		181. Organize consultation meetings with resettlement affected people to let them know about the processes, timing, impacts, and procedures of land acquisition in advance.	Complaint	Yes
		182. Complete all land acquisition and livelihood restoration activities according to the LARP.	Complaint	Yes
		183. Arrange for the independent completion audit of land acquisition and economic displacement activities in line with LARP, national legislation and Lender's requirements.	Complaint	Yes
19	Social, Community and Health Review	184. As part of the project preparation, Social Community and Health Review needs to be completed for the project. This will include a review of matters including existing medical facilities, disease, and health risks to the local community. This will include both existing risks and risks related to the Project - in-migration of construction workers can subsequently lead to increased health risk to the local community (i.e.,	With an approved subplan	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		the potential for transfer of communicable or infectious diseases, such as hepatitis, polio, influenza, HIV/AIDS, malaria, etc.), crime levels, instances of alcoholism and drug use amongst others. This includes increased impacts to women and vulnerable groups, including the possibility of gender-based violence.		
		185.The findings of the review will inform the development of plans to safeguard the health and wellbeing of the local community during construction.	Complaint	Yes
		186.A Health Plan will be developed based on findings of Social Community and Health Review and incorporated into the Health and Safety Plan	Complaint	Yes
20	Labor and Working Conditions Management Plan (LWCMP) including •Local Employment and Procurement Plan (LEPP) •Social Risk Register •Gender Action Plan	187.Contents of LWCMP (LEPP; Social Risk Register, Gender Action Plan) should be provided by Contractor in his own Sub-Plans (Further Details in Ref 20 of the EMP)	With an approved subplan	Yes
		188.Conduct induction training for all workers prior to the start of civil works, in a language(s) and format easily understood by the workforce (see Section 17 Code of Conduct).	Complaint	Yes
		189.The workforce induction and documentation should specifically include worker rights and responsibilities, including the worker grievance procedure, cultural context induction, and interaction/engagement with community members. The induction needs to apply for all workers (anyone working on the project site).	Complaint	Yes
		190.The contractor needs to ensure that the core labor requirements are	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		cascaded down across the entire contracting chains, including sub-contractors and suppliers of core materials.		
		191. The LWCMP will tie in with the GRM.	Complaint	Yes
		192. The LEPP will describe the measures to be taken to promote local procurement and employment. Key actions will include processes and commitments to: - Maximize number of local people employed in pre-construction and construction works (both men and women). - Maximize goods and services sourced from local commercial enterprises. - The need for work conditions to be competitive but comparable to equivalent employers, including equal pay for equal work by migrant workers (e.g., construction force laborer's that may be engaged);	Complaint	Yes
		193. The Engineer / PIURR will undertake a labor audit during the first month of the construction phase to confirm compliance with the Labor Standards identified above.	Complaint	Yes
		194. The contractor will supply and/or employ workers with appropriate skills / competencies and qualifications.	Complaint	Yes
		195. The Gender Action Plan (GAP) will complement the LEPP and describe affirmative measures to be taken to promote women in construction and gender-sensitive construction practices.	Complaint	Yes
		196. The prevention of any form of gender-based violence, including sexual harassment (in line with the Code of Conduct), including through the provision of explanatory	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		sessions on the anti-harassment policy to all new and existing workers,		
		197.The development of concrete, affirmative measures, in collaboration with PIURR and the Lenders, to increase the number of women in specific positions through active local recruitment campaigns and outreach to VET institutions and Faculties of Engineering,	Complaint	Yes
		198.The provision of adequate working conditions and Personal Protective Equipment (PPE) to workers of both sexes - customized by anthropometric specifications of women and men workers.	Safety inspections and toolbox meetings are carried out regularly at the construction sites	Yes
		199.The need for work conditions to provide a safe, secure and equal environment for men and women, including separate toilets for male and female workers with access to water and soap close to the actual places where women work, installation of lighting inside toilets and in the area through which women access these facilities, provision of adequate premises where women can get ready before starting work (i.e. accessible and clean places equipped with changing room and a toilet, in a facility that is well-illuminated), adequate lighting on site at night;	Toilets and bathrooms with running hot and cold water for cleaning hands at camps.	Yes
		200.The promotion of gender-responsive external communications, including through presentation of men and women road workers in visual PR and communications materials (from recruitment to delivery of the Project), consistent usage of images to	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		represent the entire client base services (e.g. women and men of local communities benefiting from road construction and maintenance); use of nonsexist, gender-sensitive language, the respectful non-sexualized depiction of women, and provision of female role models based on women's competence and professional skills in all public presentations, print and media, for local employment recruitment and other campaigns;		
		201.The maintenance of relationships with relevant community groups (especially women groups)	Complaint	Yes
		202.The establishment of a system for monitoring the GAP.	Complaint	Yes
21	Traffic Management Plan (TMP)	203.The plan shall be designed to ensure that traffic congestion and traffic safety impacts due to construction activities and movement of construction vehicles, haulage trucks, and equipment is minimized. The plan shall be prepared in consultation with traffic officials. The plan will cover both on-site and off-site traffic movements.	With the approved subplan and it was updated in May 2023.	Yes
		204.The plan shall identify traffic diversion and management issues, traffic schedules, traffic arrangements showing all detours/lane diversions, modifications to signaling at intersections, necessary barricades, warning/advisory signs, road signs, lighting, and other provisions to ensure that adequate and safe access is provided to motorists and other road users in the affected areas.	Complaint	Yes
		205.Pre-construction access road surveys will also form part of the TMP.	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		206.The Contractor shall provide information to the public about the scope and schedule of construction activities and expected disruptions and access restrictions at least 24 hours before the disruptions. Construction site access roads which are also used by local traffic shall include safe passing places every 200 m where the roads are narrow.	The Contractor installed safety signages and warning signs along the route. Installed temporary barricades along the project route particularly in sharp curves and along steep slope roadsides.	Yes
		207.Access roads for batching plants, etc., should be maintained to their existing (or better) condition during the construction phase.	Complaint	Yes
		208.Construction site access roads and village access roads should be inspected regularly to identify any damage to verges, bridges, culverts, etc. and any deterioration will be repaired as soon as practicable.	Complaint	Yes
		209.Regularly monitor traffic conditions along construction site access roads and village access roads to ensure that project vehicles are not causing congestion or traffic hazards.	Method statements for all access roads were prepared, and the traffic management plan was updated to include these roads (May 2023).	Yes
		210.Install temporary accesses to properties affected by disruption to their permanent accesses and ensure access is possible at all times.	Complaint	Yes
		211.Reinstate good quality permanent accesses following completion of construction.	Complaint	Yes
		212.Impose speed limits on construction vehicles when travelling along residential areas.	Complaint	Yes
		213.As part of the TMP, the Contractor shall consult with local residents to establish processes and locations for safe livestock crossing of the proposed access roads.	Complaint	Yes
22	Health and Safety Plan to include	214.The Plan shall address health and safety hazards	With an approved subplan.	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
	• specific measures for the construction of bridges and tunnels • Health Plan	associated with construction activities (e.g., excavations, tunnelling etc.), use of heavy equipment, transport of materials and other hazards associated with various construction activities, including both risks to site personnel and to the community. The Plan shall address hazards from a gender perspective, for the Plan to be in line with the G AP.	Provided regular H&S training for workers.	
		215. The document to be read together with the Camp Management Plan, and other activity specific sub-plans.	Complaint	Yes
		216. All workers (including sub-contractors) will receive a formal induction ahead of starting works, in a language(s) and format easily understood by the workforce. This will include information on health and safety measures, emergency response in case of accidents, fire, earthquakes, landslides, flash foods, disease etc., and minimization of environmental and community impacts. The Contractor will also develop and implement a safety and security training program including toolbox talks, safety briefings, and issue specific training. Conduct safety meetings on monthly regular basis. The Contractor shall develop women-only training sessions and safety meetings and discuss any additional health and safety concerns from a gender perspective.	Complaint	Yes
	General Safety Measures	217. Appointment of an environment, health, and safety (EHS) manager to supervise implementation of mitigation measures, to ensure that environment,	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		health, and safety precautions are strictly implemented, evaluate efficiency of mitigation measures, and identified new measures if required.		
		218. Develop and implement a process for reporting and investigating incidents, injuries, near misses and unsafe conditions.	Complaint	Yes
		219. Provide driver training programmes to ensure that Contractor's staff are aware of community sensitivities, such as specific livestock movement periods.	Complaint	Yes
		220. Ensure lighting in public places is adequate and is maintained, particularly to reduce gender-based violence and construction and road safety risks at night.		Yes
		221. Provide safe road crossings for children including adequate signals to alert presence of children and families.	Pedestrian walkways and safety signs have been created and placed in all villages adjacent to the Road Project.	Yes
		222. Provide a series of road safety awareness sessions for schools in the Project Area.	A road safety awareness was part of the discussion during training on safety rules	Yes
		223. The sessions will be provided on a six-monthly basis throughout the construction phase.	Complaint	Yes
		224. As part of the awareness sessions, children will be given reflective badges to fix to their coats and school bags.	Complaint	Yes
		225. Ensure all construction driving is to occur during daytime hours, where possible.	Complaint	Yes
		226. Prepare guidelines for maximum driving hours per day and week, to prevent driver fatigue.	Complaint	Yes
		227. All drivers to adhere to site and national speed limits, reinforced by speed limit signage and sanctions for non-compliance.	Complaint	Yes
		228. Provide road signs in accordance with the approved TMP.	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		229.Consult with local households, community groups, police, and emergency services along the transport routes as per the SEP.	Complaint	Yes
		230.Consult with local households and community groups to establish locations and methods for allowing safe passage of animals / stock across the route. Crossing points are recommended.	Complaint	Yes
		231.Develop and implement a program of workplace inspections and audits, to monitor the effectiveness of EHS control measures.	Complaint	Yes
	Health and Welfare	232.Provide adequate housing conditions and services for all workers at the construction camp/camps as per requirements of national legislation, and EBRD/ADB/AIIB standards, including EBRD/IFC Guidance Note: Workers' Accommodation: Processes and Standards. ⁴	Conducted an internal site inspection using a checklist of workers' accommodation based on IFC and the EBDR guidelines.	Yes
		233.Provide separate hygienic sanitation facilities/toilets and showers areas with sufficient water supply for male and female workers.	Hygienic sanitation facilities/toilets and showers areas with sufficient water supply for male and female workers are in good/clean conditions during this monitoring period.	Yes
		234.Provide reliable and sufficient supply of safe potable water at all times. Ensure that all supplies meet the drinking water standards of Tajikistan.	Complaint	Yes
		235.Establish clean canteen/rest areas with hand washing facilities.	Complaint	Yes
		236.Provide portable toilet facilities with hand washing facilities for workers at work sites. Toilet facilities must not pollute surface waters and must have holding tanks with waste transferred back to camp.	Complaint	Yes

⁴ https://www.ebrd.com/downloads/about/sustainability/Workers_accomodation.pdf

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		237.The construction camp will be staffed and equipped with a health clinic for all workers.	Complaint	Yes
	Security	238.Provide appropriate security measures to prevent unauthorized access to hazardous work sites, including fencing on all areas of excavation greater than 1 m deep.	The Contractor provided barriers, signage, safety tapes at the periphery of the construction sites.	Yes
		239.Enforce access restrictions by means of regular monitoring of site boundaries (either by patrols or by camera)	Complaint	Yes
	PPE	240.Provide appropriate personnel protection equipment (PPE) and harnesses (safety boots, helmets, gloves, protective clothes, breathing mask, goggles, and ear protection) adequate to task/activity. The PPE is to be provided for all site personnel – contractors, subcontractors, Project Management and CSC staff, and site visitors (including drivers who leave their vehicle cabs while on site). Sufficient stocks of PPE must be held at all camps.	Safety inspections and toolbox meetings are carried out regularly at the construction sites. The proper and consistent use of PPE is continuously monitored to ensure compliance and safety.	Yes
	Excavations	241.Minimize the duration of excavations and backfill as soon as practicable.	Complaint	Yes
		242.Install warning signs where required, in accordance with other management plans (e.g., TMP).	Additional traffic warnings and signs were installed along the access roads.	Yes
		243.Implement measures to avoid damage to buried utilities (e.g., consultation with service providers and land users, use of service location equipment, support for exposed services, etc.)	Complaint	Yes
	Plant and Equipment	244.Regularly inspect, test, and maintain all safety equipment. Immediately replace equipment that is not in working order, damaged and/or not fit to use.	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
	Work at Height / Fall Prevention	245.Ensure reversing signals are installed on all construction vehicles, although consider the noise impacts and controls in the NVMP.	Complaint	Yes
		246.Implement fall prevention and protection measures whenever a worker is exposed to the hazard of falling more than two meters, falling into operating machinery, falling through an opening in a work surface, or other dangerous location. Fall prevention/protection measures may include:	Complaint	Yes
		247.installation of guardrails with mid-rails and toe boards at the edge of any fall hazard area;	Complaint	Yes
		248.installation and inspection of scaffolds by competent persons;	Complaint	Yes
		249.regular inspection of ladders and access equipment;	Complaint	Yes
		250.proper use of ladders and scaffolds by trained employees, use of fall prevention devices, including safety belt and lanyard travel limiting devices to prevent access to fall hazard, fall protection devices such as full body harnesses, etc. Regular inspection of fall prevention devices.	Complaint	Yes
		251.Mark the areas where risk of injuries from falling objects exist with rope or flagging to minimize risks and injuries.	Complaint	Yes
	Work in Confined Spaces	252.Develop a procedure for entry into confined spaces, including training of personnel, PPE requirements, rescue provisions, etc.	Complaint	Yes
		253.Prohibit entry into confined spaces, except by trained persons using the controls developed.	Complaint	Yes
	Electrical Equipment and Electrical Works	254.Ensure that all electrical equipment is suitable for use in a harsh construction environment.	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		255.Regularly inspect electrical equipment and replace / repair if damage is identified.	Complaint	Yes
		256.Ensure that electrical works are only conducted by qualified and experienced personnel	Complaint	Yes
		257.Ensure that power supply is disconnected and isolated before work is allowed on electrical systems.	Complaint	Yes
	Lifting Operations	258.Ensure that all lifting operations are planned and supervised by suitably qualified and experience persons, to minimize risk to persons on site, and to co-ordinate with other site activities. This must include measures to avoid contact of lifting equipment and loads with above ground utilities and structures.	Complaint	Yes
		259.Prevent persons from walking beneath loads.	Complaint	Yes
		260.Ensure all loads are properly secured.	Complaint	Yes
		261.A programme of inspection and testing to be developed and implemented for all lifting equipment, including all straps, chains, shackles, etc.	Complaint	Yes
	Hazardous Chemicals	262.Ensure that all hazardous chemicals are stored appropriately in suitable containers and labelled with the name and hazards of the contents.	Complaint	Yes
		263.To prevent bitumen burns, ensure workers handling hot bitumen to wear full-body protection.	Complaint	Yes
		264.All transportation, handling and storage of bitumen will be done by experienced personnel.	Complaint	Yes
		265.Ensure all hazardous materials are stored (including within suitable sized bunds for liquids), handled and disposed of appropriately.	Regular checking of the bunding around fuel storage tanks. Updated the WMMP to include the management of hazardous waste, storage areas, handling, and disposal, including information relating to waste collection and the	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
	Heat / Cold Exposure		licensed companies collecting the waste in May 2023.	
		266.Keep a plan of site indicating where all hazardous materials are stored.	Complaint	Yes
		267.Provide suitable clothing for work during cold and/or wet, weather.	Complaint	Yes
		268.Provide shaded rest areas and drinking water and organize work to allow for sufficient rest breaks during hot weather.	Complaint	Yes
	Site Illumination	269.Provide sufficient lighting at night within and in the vicinity of construction sites but consider need for mitigation of impact on wildlife and community.	Complaint	Yes
23	Emergency Response Plan including - Natural Disaster Response - Spill Management Plan	270.Develop and implement emergency preparedness and response plans (ERP) for each Project package. These should include measures for prevention, mitigation, and response to emergency scenarios.	With an approved subplan	Yes
		271.The Spill Management Plan will include procedures, responsibilities, resources, documentation and reporting requirements, training provisions for relevant staff, etc. to avoid spills of hazardous substances and to effectively respond to such incidents.	Complaint	Yes
		272.All refueling activities must occur on hard surfacing.	Complaint	Yes
		273.Provide first aid facilities that are readily accessible by emergency response personnel and workers.	Complaint	Yes
		274.Provide firefighting equipment at the work areas, as appropriate, and at construction camps.	Complaint	Yes
		275.The ERP must be regularly reviewed and updated – as a minimum annually and after any	The ERP was approved in Q2 2022. Updated ERP was made in May 2023	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		emergencies or accidents.		
24	Camp Management Plan	276. Prior to start of site works, an Environmental and Social Screening of potential camp locations prior to construction, to identify any sensitive environmental receptors and to ensure the camps are of sufficient distance from villages and local communities.	With an approved subplan.	Yes
		277. Consultation with local communities before the construction camp is developed.	Complaint	Yes
		278. Location of camps over one kilometer from any residential area and at least 50 m from any surface watercourse and not within 2 km of a protected area – any deviation from these separation distance must be supported by sufficient justification and additional mitigation measures, and the location and mitigations must be approved.	Complaint	Yes
		279. Coordination of all construction camp activities with neighboring land uses.	Complaint	Yes
		280. Confirmation as to whether workers can be accompanied by families or whether rosters will enable locally engaged workers to go home daily or not.	Complaint	Yes
		281. Prior to start of site works, the Contractor shall develop a Camp Management Plan.	Complaint	Yes
		282. Ensure that workers' accommodation / construction camps are designed and managed in compliance with EBRD/IFC guidance on worker's accommodation.	Conducted an internal audit for workers' accommodation / construction camps in compliance with EBRD/IFC guidelines.	Yes
		283. Layout of the site, including location of temporary specifications for storage areas for waste, equipment maintenance areas, lubricant, and fuel storage	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		sites with indication of the distance from watercourses and other sensitive receptors description of sewage management activities, including treatment, monitoring, and effluent disposal processes;		
		284. Description of waste management activities, including waste minimization, and storage and disposal processes for each waste stream;	Complaint	Yes
		285. Community relations, restriction of access to camp and facilities, induction briefing on camp rules and local issues/sensitivities, camp rules (such as restrictions on; alcohol, drugs use, discipline, noisy activities, community liaison, no poaching, environmental protection measures applicable to the camp site, decommissioning and re-cultivation, etc.), and workers welfare.	Complaint	Yes
		286. The construction camps will be staffed and equipped with a health clinic for all workers.	Mobilized medical professionals during the project construction phase: Yusupova Mohrukhsor. Tajiddinovna Camp No. 1; Tel: 000996854 Mirzoev Ibodullo Kamolovich Camp No. 2; Tel No: 552557565; 904466637 Nurov Mahmadrusul Ghafurovich Camp No. 3; Tel No: 900908506 Nazarov Mahmayor Iskandarovich Camp No. 4; Tel No: 908850041 Musamirov Amirbek Camp No. 5; Tel No: 909666995	Yes
		287. The Contractor will be responsible for maintenance and clean-up of campsites and respecting the rights of local land users.	Complaint	Yes
		288. The Camp Management Plan will indicate the system proposed and the locations of related	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		facilities in the site, including latrines, showers, canteen, recreation facilities, laboratories, maintenance areas, etc. The plan will cover camp sites as well as any sites considered as associated facilities, and will require IFI consideration, due diligence, and approval.		
		289. The plan will cover camp sites as well as any sites considered as associated facilities, and will require ADB, OFID, EBRD and AIIB consideration, due diligence, and approval.	Complaint	Yes
		290. The plan will cross reference other sub-plans including Water Resources Management Plan, Spill Management Plan, Air Quality Management Plan, Noise and Vibration Management Plan, Waste and Materials Management Plan, and others as required.	Complaint	Yes
25	Concrete and Asphalt Production Management Plans	291. Prior to the start of site works, the Contractor shall develop a Concrete and Asphalt Production Management Plan.	With the approved subplan	Yes
		292. The Plan describes the layout and management of asphalt and concrete batching plant including location, hours of use, water discharge, noise and vibration management and dust control.	Complaint	Yes
		293. Batching plants will be located downwind of residential areas and not within 1 km of any residential area.	Complaint	Yes
		294. The entire batching area traversed by vehicles – including driveways leading into and out of the area – will be paved with a hard, impervious material.	Complaint	Yes
		295. Sand and aggregates will be delivered in a dampened state, using covered trucks. If the	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		materials dry out during transit, they will be covered to avoid creation of dust.		
		296. Sand and aggregates will be stored in a hopper or bunker which shields the materials from winds. The bunker should enclose the stockpile on three sides. The walls should extend 1 m above the height of the maximum quantity of raw material kept on-site and extend 2 m beyond the front of the stockpile.	Complaint	Yes
		297. The hopper or bunker will be fitted with water sprays which keep the stored material damp at all times.	Complaint	Yes
		298. Monitor the water content of the stockpile to ensure it is maintained in a damp condition.	Complaint	Yes
		299. Overhead storage bins will be totally enclosed. The swivel chute area and transfer point from the conveyor will also be enclosed.	Complaint	Yes
		300. Rubber curtain seals may be needed to protect the opening of the overhead bin from winds.	Complaint	Yes
		301. Conveyor belts which are exposed to the wind and used for raw material transfer will be effectively enclosed, to ensure dust is not blown off the conveyor during transit. Conveyor transfer points and hopper discharge areas will be fully enclosed.	Complaint	Yes
		302. Conveyor belts will be fitted with belt cleaners on the return side of the belt.	Complaint	Yes
		303. Weigh hoppers at front end loader plants will be roofed and have weigh hoppers shrouded on three sides, to protect the contents from the wind.	Complaint	Yes
		304. The raw materials transferred by the front-end loader should be	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		damp, as they are taken from a dampened stockpile.		
		305.Store cement in sealed, dust-tight storage silos. All hatches, inspection points and duct work will be dust-tight.	Complaint	Yes
		306.Silos will be equipped with a high-level sensor alarm and an automatic delivery shut-down switch to prevent overfilling.	Complaint	Yes
		307.Cement dust from the silo during filling operations must be minimized. A fabric filter dust collector will be used.	Complaint	Yes
		308.The cement weigh hopper will be enclosed, to ensure that dust cannot escape.	Complaint	Yes
		309.An inspection of all dust control components will be performed regularly – for example, at least weekly.	Complaint	Yes
		310.The plan will cross reference other sub-plans including Water Resources Management Plan, Spill Management Plan, Air Quality Management Plan, Noise and Vibration Management Plan, Waste and Materials Management Plan, and others as required.	Complaint	Yes
26	Construction plans and Method Statements	311.Plans will outline the specific construction for each element of the Project.	With an approved sub-plan	Yes
	Bridge Construction Plan	312.General construction noise at the portals during “mucking out” (removal of rock spoil) and vehicle movements (removing spoil),	Complaint	Yes
		313.Noise and vibration during the drill and blast work (though generally confined to the works developing the portal area),	Complaint	Yes
		314.Dust generation works (particularly portal emissions from extraction fans);	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		315.Potential for both silty and oily runoff;	Complaint	Yes
		316.Disturbance to fauna, particularly nesting birds, and roosting bats, etc. from blasting noise and vibration.	Complaint	Yes
	Tunnel Construction Plan	317.Use of non-toxic slurry and additives and minimize impact of these materials to reduce risk of impact on ground water quality.	Complaint	Yes
		318.Ensure that pressure applied to tunnelling and ground treatment is controlled to prevent excessive pressure that will drive the slurry out of the desired range increasing the risk of water pollution.	Complaint	Yes
		319.Ensure any de-watering does not impact groundwater users (users of wells etc.).	Complaint	Yes
		320.Include cross reference to the Blasting Management Plan	Complaint	Yes
	Tunnel Handover Plan	321.The Tunnel Handover Plan will as a minimum include an operations handover process and the documentation required for handover; training requirements including commissioning and staffing requirements; occupational health and safety requirements and risk management and reporting.	Complaint	Yes
	The Slope Stabilization Plan	322.The Slope Stabilization Plan will determine the specific areas of slope stabilization works ahead of construction.	Complaint	Yes
		323.All Construction Plans will cross reference relevant environmental, social and health and safety sub-plans.	Complaint	Yes
27	Method Statements for Temporary Activities including - Storage Areas - River crossings - Roads/ Access Roads	324.The Contractor will be responsible for preparing a method statement for any temporary activities and infrastructure (e.g., temporary roads, temporary river crossings,	Method statements relating to work safety in steep slopes, temporary stockpiles over 100 m ³ , and access roads were prepared in May 2023.	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		temporary storage areas), including establishment, operation, and reinstatement of the facilities.		
28	Blasting Management Plan including Tunnel specific measures	325.Details on the Sub-Plan Activities to be complied with by the Contractor (Further Details in Ref 28 of the EMP)	With an approved sub-plan	Yes
		326.The Contactor must appoint an authorized blasting contractor.	Complaint	Yes
		327.The Contractor must audit suppliers, ensure all approvals and authorizations are in place and good practices are applied in line with international practice ahead of blasting works	Complaint	Yes
		328.Methodology for the management of control of tunnel blasting including methods for noise and air quality management and occupational and community health and safety.	Complaint	Yes
		329.Blasting will be scheduled during the day only.	Complaint	Yes
		330.Communities (within the area impacted by blasting related impacts) will be informed of blasting timetable in advance and will be provided adequate notice of when blasts are required outside of the planned schedule.	Complaint	Yes
		331.Throughout the blasting activity, if required, vibration sensors will be installed at strategic locations to monitor the impact of blasting and to ensure that the vibration levels are within the adopted criteria. The monitoring plan will be part of the Blasting Management Plan.	No blasting activities during this monitoring period. Both tunnels are passable, and construction activities are more on electrical and electronic system installation.	Yes
		332.Use blasting design with consideration of safety, blast geometry, free faces, burden, spacing, initiation pattern (delayed blasting) and angled holes. Use multi deck blasting technique is considered as efficient	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		method creating lower vibration.		
		333. Develop and implement suitable procedures for management of explosives, including security and storage arrangements.	Complaint	Yes
		334. Must be produced in accordance with the requirements of the Biodiversity Management Plan (e.g., regarding avoidance of impacts to nesting birds and roosting bats, etc.).	Complaint	Yes
		335. The Blasting Management Plan will set out the safe and secure storage of blasting equipment (including explosives) when not in use.	Complaint	Yes
29	Construction Road Access Management Plan	336. A Construction Access Road Management Plan will be developed, which will include measures for the establishment, operation, and timely reinstatement of the roads.	Method statements for all access roads were prepared, and the traffic management plan was updated to include these roads. Done in May 2023.	Yes
		337. Disruption to villagers along the construction access roads must be minimized at all times.	Complaint	Yes
		338. The construction access roads shall be carefully chosen and delineated to minimize impacts on landscape and soil erosion, and damage to bridges, riverbanks, verges, drain conduits and other structures along the route, and will be closely monitored to eliminate their unduly expansion during construction work.	Complaint	Yes
		339. The top surface of access roads and work areas should be graded and compacted before works commences and maintained through the works to remove ruts and potholes. The access roads should be watered to reduce the impact of dust caused by vehicles running on dry dusty	Complaint	Yes

Work phase	Potential impacts/issues	Mitigation measure prescribed in EMP	Implementation status, issues identified and corrective actions	In compliance?
		surfaces. Speed limits should be identified by the contractor and strictly maintained to reduce noise and dust emissions and for road safety purposes.		
		340. The requirements for environmental, social and safety controls on the access roads will be identified during the assessments of each route but will implement the same types of management plan as set out in the EMP (for issues such as safety management, dust control, water control, etc.) for the main alignment.	Complaint	Yes

EMP = environmental management plan, EMU = environmental management unit

37. Based on Table 4, the project complies with the mitigation measures outlined in the EMP, meeting 337 out of 342 prescribed measures. Only five mitigation measures related to handling asbestos are not applicable to the project, as no asbestos materials have been found in the tunnel or excavation sites.

38. **Conclusions and next steps.** All mitigation measures are being fully implemented, and the project complies with the Environmental Management Plan (EMP) requirements. During construction, the project applied a combination of quantitative and qualitative monitoring methods to assess key parameters, including water quality, wastewater effluent, air quality, noise and vibration levels, waste management practices, and community health and safety. The monitoring results confirm that the project effectively mitigated environmental impacts throughout the construction phase.

39. The next steps include: (i) continued nurturing and maintenance of seedlings planted along the road project alignment; (ii) routine road maintenance; and (iii) implementation of the Environmental Management Plan during the first year of project operation. These actions are essential to sustain environmental performance, uphold social and safety objectives, and ensure continued compliance with the requirements of ADB and the Government of the Republic of Tajikistan.

2. Implementation of the project monitoring program

40. The following environment safeguard monitoring was conducted in the reporting period focusing on (i) care and maintenance of planted seedlings; (ii) community health and safety issues and security; and (iii) grievance mechanism. Summary data are presented in Table 5. Photographs from site inspection and monitoring activities are in Appendix 1. A summary of the monitoring activities is presented here.

41. **Internal monitoring.** During the reporting period, the project has taken necessary mitigation and enhancement measures and corrective actions to fulfill the Project requirements. The main activities undertaken during the current reporting period are as follows:

- Closely monitored the Contractor's compliance with health and safety, environmental, and social requirements for the project.
- Compiled and summarized environmental safeguard reports from both the Consultant and the Contractor, as well as field reports.
- Monitored the implementation of mitigation measures for the access road project component.
- Coordinated the project's compliance status with the bank, addressing any non-compliance issues.

42. During the current reporting period, the project did not undertake physical monitoring of surface water quality, air and noise quality, wastewater effluent, or vibration levels, as the ongoing activities were limited in scale and unlikely to generate significant environmental impacts. The civil works undertaken during this period included: (i) completion of utility buildings for the Kandak and Karagach Tunnels; (ii) installation of tunnel lighting systems; (iii) development of recreational areas; and (iv) decommissioning of a batching plant, and other associated auxiliary facilities.

a. Status of water resources and utilities

43. During construction, the Project encountered various issues related to water pipes and hoses damage, water supply interruptions, and damage to irrigation canals caused by slope stabilization, excavation, base course preparation, and other site preparation works. To address these concerns, the Project undertook measures such as replacing damaged water pipes, installing casing at preferred locations identified by villagers, and repairing irrigation canals. Table 6 presents the existing details of the water resource issues raised by different households and villages during its construction.

44. To facilitate the installation of new underground water supply pipelines and ensure protection during repairs, the Project has provided casing for these pipes in three road sections. As of this reporting period (July - December 2025), the project accounted 22 water casings: eight in Section 1, seven in Section 2, and seven in Section 3. In the event of repairs, all water supply pipes are channeled through the provided casing.

Table 5: Summary of Environmental Monitoring During Construction Activities Between 1 June 2025 and 31 December 2025

Subject	Parameter	Type of monitoring	Frequency	Monitoring compliant with EMP program? Y/N	Results meet the required standards? Y/N	Corrective actions
Ambient air quality	(Particulates TSP, CO, CO ₂ , NO, NO ₂ , and SO ₂)	Internal	Monthly and in response to complaints Whole alignment (including access roads)	Not applicable this monitoring period	Not applicable this monitoring period	None
Ambient noise quality	Daytime and nighttime noise levels dB(A)	Internal	Monthly and in response to complaints Whole alignment (including access roads)	Not applicable this monitoring period	Not applicable this monitoring period	None.
Vibration level	Daytime and nighttime vibration levels dB(A)	Internal	Continuous and during blasting Whole alignment (including access roads)	Not applicable this monitoring period	Not applicable this monitoring period	None
Surface water quality	(pH, suspended solids, BOD, DO, and total oil and grease)	Internal	Bi-weekly Downstream activities close to rivers or streams.	Not applicable this monitoring period	Not applicable this monitoring period	None
Effluent monitoring (camp sewage treatment)	(pH; Suspended Solids; BOD; DO; Coliforms; oil and grease)	Internal	Weekly	Not applicable this monitoring period	Not applicable this monitoring period	None
Tunneling	Subsidence	Internal	Daily Tunneling operations	Yes. Regular safety briefings are conducted on-site, and appropriate PPE is provided to all workers. Designated staff are assigned to each tunnel to maintain an accurate entry system, ensuring the exact number of workers inside the tunnel at any given time.	Yes	None
Groundwater quality	pH, suspended solids, BOD, DO, and total oil and grease	Internal	Seasonal	Not applicable this monitoring period	Not applicable this monitoring period	None

Subject	Parameter	Type of monitoring	Frequency	Monitoring compliant with EMP program? Y/N	Results meet the required standards? Y/N	Corrective actions
Vegetation	Tree planting	Internal/ External	Seasonal	Yes. As of December 2025, the project is nurturing approximately 10,000 seedlings planted along the road project alignment.	Yes.	An approved contract agreement has been established with Palma Farm Nursery for the supply and planting of seedlings at the site.
Biodiversity – as detailed within the BMP	Flora and fauna	Internal	For the duration of the construction phase As detailed within the BMP	Yes. As of December 2025, the project is nurturing approximately 10,000 seedlings planted along the road project alignment.	Yes.	An approved contract agreement has been established with Palma Farm Nursery for the supply and planting of seedlings at the site.
Subcontractor	Subcontractor audits	Internal	N/a	Yes. About 20 staff are affiliated with the Subcontractors	Yes.	None
Labor	Labor audit	Internal/ External	All work locations	Yes. There are about 20 employees during this monitoring period.	Yes.	None
Gender	Gender Action Plan (GAP)	Internal	For the duration of the construction phase As detailed within the GAP	Yes. The PMC has a gender specialist. For details, GAP will be part of the semi-annual social monitoring report.	Yes	None.
EHS	Workplace inspections and audits to monitor the effectiveness of EHS control measures	Internal	Monthly All work locations	Yes. Construction works are duly supervised by the Contractor and CSC health and safety, and environmental experts. Construction equipment and other supporting machinery for oil and other leakages are in good order. Warning signs and safety measures are installed along access roads.	Yes	None.

Subject	Parameter	Type of monitoring	Frequency	Monitoring compliant with EMP program? Y/N	Results meet the required standards? Y/N	Corrective actions
				Camp 1 remains in place. There are enough medical supplies at Camp No 1. Installation of streetlights along different villages of the project road. Cleaning of the excess asphalts and construction debris. The Project carries out pavement cleaning at least twice a week to remove cow and horse manure, thereby maintaining cleanliness and ensuring the safety of road users.		
Waste management	Waste company audits	External	Depending on hazard nature of waste and frequency of use Site/Waste disposal locations	Yes. Spoil Disposal areas are already cleaned and restored.	Yes	None
Blasting	Blasting contractor audit, to ensure all approvals and authorizations are in place and good practices are applied	External	Prior to the engagement of the supplier	Not applicable during this monitoring period	n/a	None
Project and community health and safety	Regular inspection of scaffolds by competent persons	Internal/ External	Before each use All work locations with scaffolds	Yes. Done regularly by health and safety, bridge, and tunnel engineers.	Yes.	None
	Regular inspection of fall prevention devices	Internal/ External	Before each use All work locations	Yes. Done regularly by health and safety, bridge, and tunnel engineers.	Yes.	None
	Regular inspection and testing of all	Internal/ External	All work locations	Yes. Done regularly by health	Yes.	None

Subject	Parameter	Type of monitoring	Frequency	Monitoring compliant with EMP program? Y/N	Results meet the required standards? Y/N	Corrective actions
	lifting equipment, including all straps, chains, shackles, etc.			and safety, bridge, material, and tunnel engineers of the CSC and the Contractor.		
	Inspection of dust control measures at concrete/ asphalt plants	Internal/ External	All work locations	Yes. Water spraying activities have been done during spring and summer seasons.	Yes.	None
	Wind speed monitoring (for dust control purposes)	Internal/ External	Daily and following significant increases in wind. All work locations	Yes. The real-time and projected wind speed monitoring rely on an online weather station at Khoja Obigarm. ⁵	Yes.	None
Traffic management	Traffic and road conditions on construction site access roads and village access roads	Internal	Dependent on traffic volumes Access roads	Yes. Warnings and traffic signs are in place along the project route.	Yes.	None
Security	Security patrols to prevent public access to hazardous areas	Internal	Throughout construction All work locations	Yes. The Contractor's site offices are equipped with 24-hour security guards to ensure the safety of the camp and works. A 15-day security detail has been established as the standard assignment. Security staff are present in the tunnel construction sites for 24 hours (Kandak and Karagach tunnel sites).	Yes.	None
Climate change	Inspection of weather-related damage to construction site,	Internal	Throughout construction and specifically following significant weather events such as flash floods, mudflows, and heavy snowfall, or long periods of dry	Yes. Since the beginning of the project, the Contractor has been regularly repairing and maintaining village	Yes.	None

⁵ Weather forecast onsite is available at: <https://www.ventusky.com/?p=38.54:69.07:8&l=wind-10m>

Subject	Parameter	Type of monitoring	Frequency	Monitoring compliant with EMP program? Y/N	Results meet the required standards? Y/N	Corrective actions
	permanent and temporary assets		weather. All work locations (specifically exposed areas)	access roads to ensure constant access to site sections.		
Spoil disposal	Spoil Disposal Areas	Internal	Monthly and in response to complaints	Yes. Spoil Disposal areas are already cleaned and restored.	Yes.	None

DO = dissolved oxygen, EMP = environmental management plan, NO₂ = nitrate, pH = potential of hydrogen, SO₂ = sulfate, SS = suspended solids, TP = total particulates, TSP = total suspended particulates.

Table 6: Recorded Issues Related to Water Resources During Construction Stage

Issues	Concerned Village/Household	Actions Undertaken
Hose damage	Bozorak Village at Section 1	A 200 m hose was allocated to replace the damaged one. Resolved by 3 Aug 2022.
Damage to the pipe and water collector	Soleh Village at Section 1	Compensation was paid for the purchase of a hose amounting to 400 somoni. Resolved by 7 Sep 2022.
Water supply	Darai Tutak village at Section 1	A hose with a length of 75 m and two couplings (d-45mm) were allocated to the village. Resolved by 22 Aug 2022.
Hose damage	Soleh Village at Section 1	Two pipes were allocated with a length of 6 m, d-50mm. Resolved by 2 Dec 2022.
A water pipe at km 7+700 was damaged during the slope excavation	Darai Tutak village at Section 1	Replacement of a water pipe. Resolved by 14 Mar 2023.
A water pipe was damaged during earthworks	Kalandarov Khaibullo of the Section 1	The water pipe was removed and replaced with a new pipe. Resolved by 15 April 2023.
Damage to the irrigation/drainage canal	Davlatov Mustafo located at Section 2	Repair of the irrigation/drainage canal. Resolved by 26 June 2023.
Damage to the drainage canal	Davlatov Mustafo, Gayurov Sabur and Kasirov Abdumajid of the Section 2	Three households with similar concerns for the repair of the drainage canal. Resolved by 26 June 2023.
Isolation of 63 pipes and connectors	Kandak village at Section 1	Installation of pipes and casing across road route. The locations of the casing are identified by the local households prior to the base course and asphaltting. Resolved by 26 Jul 2023.
Damage to a 250m long hose at km 10+500	Kandak village at Section 1	Replacement of new pipes after completion of exaction work at at km 10+500. Resolved in August 2023
Destruction of a water pipe.	Hakimi Jamoat, Lyron village at Section 3	Irrigation canal restoration and replacement of a pipe. Resolved on 10 Aug 2023
	Hakimi Jamoat, Lyron village at Section 1	Provision of a water pipe. Resolved by 8 Aug 2023
Water supply pipes of the Kandak Village along km10 were fully damaged due to the landslide that occurred on 9 May 2024.	Kandak Village at Section 1	The Project and the villagers of Kandak collaborated on repairing and installing the water supply pipes. During this period, the Project supplied a daily water tank to ensure the Kandak villagers had access to water. Resolved on 10 June 2024.

Source: Environmental Monitoring Reports (2021 – 2024), TAJ: Central Asia Regional Economic Cooperation Corridors 2, 3, and 5 (Obigarm-Nurobod) Road Project

b. Status of spoil disposal areas

45. Most spoil disposal areas have been cleaned, compacted, and restored to usable condition. Several areas have been integrated into the original road alignment, with adjacent roadside strips designated for tree planting. During the current reporting period, surface areas were further cleaned and compacted, making them suitable for alternative land uses. These areas are now being utilized for strip tree planting, the Kandak exit tunnel building control facility, comfort rooms, and parking spaces. In addition, the ground area of the spoil disposal site has

been repurposed to accommodate the Karagach building service facility serving the exit tunnel, following continuous site cleaning, leveling, and ground compaction to enhance its suitability for productive use.

c. Management of hazardous and non-hazardous waste

46. Domestic solid waste produced at the site, particularly at Camp No. 1, is being deposited temporarily in the designated storage at each section. A garbage hauler was contracted to transport the waste materials in Kamari in Rogun City, the city's disposal site, once a week. The Contractor contracted with the hauler, Kurbonov Bobishoh, dated 12 September 2021, for regular collection and hauling out of accumulated garbage, which continued during this reporting period (July – December 2025).

47. The domestic waste is removed regularly by an agreement with the community services of Rogun City. Again, the garbage is disposed of the official refuse tip of Kamari Mugul in Rogun city. Three plastic containers have been placed near kitchens and workers' quarters of each camp. There are also designated utility staff responsible for each campsite. There is proper sorting and storing of solid wastes (unused metals, scrap metals, and rods). Containers for separate collections of biodegradable, non-biodegradable, and recyclable waste are installed in the camps.

48. The medical waste was transported to the regional hospital in Obigarm, where it was incinerated with permission from the Hukumat of Rogun City.

49. Several recyclable materials are in place for this road project, e.g., bottles, metals, cardboard, used tires, paper, etc. These recyclable materials are separated at the disposal area along Kamari Mugul Street. Another company comes to the site to gather all potential marketable materials for buyers in bigger cities like Dushanbe.

d. Health and safety

50. Requirements on Health and Safety are provided in Clause 1301.17 of the Supplementary Specifications with sub-clauses as follows: (i) general; (ii) safety equipment; (iii) health measures; (iv) health and safety unit; (iv) site induction, (v) cooperation with health authorities; and (vi) other health and safety measures.

51. Following IFC and the EBRD requirements, health, safety and security observations are presented in Table 7. It shows the existing concerns in terms of health and safety, including the workers' accommodation standards per IFC and the EBRD guidance notes.

52. In terms of the community road safety, the project design speed is set at 50 kph, considering the road's location in predominantly mountainous terrain, and it aligns with the specifications for Class III roads. However, certain sections require reduced speed limits, such as near villages (40 kph), sharp bends (50 kph), and tunnels (40 kph). To enhance safety, traffic warning signs and informational signage have been installed on both sides of the road. While the design speed of 50 kph is 40 kph lower than the typical rural speed limit in the Republic of Tajikistan, it is also 20 kph below the safe system speed of 70 kph recommended for CAREC countries.⁶

⁶ ADB. 2024. CAREC Road Safety Engineering Manual 7. WHY AND HOW TO MANAGE SPEED. p41. Availability: <https://www.adb.org/publications/carec-road-safety-engineering-manage-speed>

Table 7: Health and Safety Findings During This Monitoring Period, July – December 2025

Issues	Findings	Remarks
A. Safety Management Systems		
1. Accident/Incident Report	No accidents or any injuries have been recorded during this monitoring period.	Compliant
2. Document Control	Health and safety records are in place at each camp.	Compliant
3. Risk Assessment	Work instructions have been created and contain details on potential hazards.	Compliant
4. Inspections	The OHS staff conducted a regular site visit to check the compliance of the Contractor related to the (i) first-aid trainer to train essential personnel in the camps, (ii) good records of the persons treated onsite, (iii) first aid kit in all camps, (iv) need for accident notification protocol, and (v) reference materials for health and safety including Health and Safety Laws in Tajikistan. The Project, through its health and safety specialist assures and calls the attention of all project workers to wear full PPE during construction work for safety.	Compliant
5. Sub-contractors	No operation.	Compliant
6. Public/Local Community	A grievance redress mechanism is in place for the project to address any complaints from the public and local villagers. No grievance/s received during this monitoring period.	Compliant
7. Systems and Policy	Updated the Safety and Health Plan (2023), which includes the previous health and safety recommendations and actions in the last site audit.	Compliant
8. Change Management	Same management.	Compliant
9. PPE	Regular on-site briefings are conducted to emphasize the importance of using PPE, such as helmets, reflective vests, safety shoes, safety gloves, safety goggles for welders, safety belts when working at height, and a common waste management on site.	Compliant
10. Training	Toolbox meeting prior to work	Compliant
11. Supervision	The Contractor has a permanent Emergency Services Supervisor and an Environmental Officer on-site, who manage environmental and health/safety issues.	Compliant
12. Competence	All drivers and operators of equipment such as excavators, cranes, lorries, and machinery have enough experience and are capable of the operation.	Compliant
13. Communication	Safety and health posters are in place in the camps and facilities. Toolbox meetings are repeatedly held, with records and reports available. Internal information on accident and incident statistics and general safety and health performance is being communicated to the Contractor and the Consultant project progress meeting.	Compliant
B. Workplace Management		

Issues	Findings	Remarks
1. Slips and Trips	All areas continue to be well-maintained and free from slip and trip hazards.	Compliant
2. Machinery Contact	The equipment with moving parts has been well guarded in secure places.	Compliant
3. Work Equipment	The work equipment is generally of a high standard and well maintained.	Compliant
4. Electricity	Electrical boxes with cover are organized.	Complaint
5. Onsite Traffic Management	Security staff are present to prevent public access to the sites, particularly during working hours. Speed limit warning signs are in place throughout the project route.	Compliant
6. Public Traffic Interface	Some signs have been installed warning the public that entrance to the site is prohibited. Other warning signs are in place warning drivers that children were present.	Compliant The design speed of 50 kph is 40 kph lower than the typical rural speed limit in the Republic of Tajikistan, it is also 20 kph below the safe system speed of 70 kph recommended for CAREC countries.
7. Building Maintenance	All camps are steel containers and in good condition with a regular cleaning scheme.	Compliant
8. Work at Height	No activities related to work at height during this monitoring period.	Complaint
9. Lifting	Lifting equipment appeared in good order with most lifting shackles already attached to equipment from the manufacturer.	Compliant
10. Fire/ Explosion	Firefighting measures are also in place in case of fire. Signs for safety are posted on the camp premises to remind the workers of the importance of safety. There are fire extinguishers, shovels, sand and water containers. Gas cylinders in all camps are located outside the kitchen and protected by a metal cover.	Compliant
11. Storage	The Contractor has been made maintenance for cleaning trays and drains from accumulated debris and soil, repairing and cleaning sewer pipes in showers and toilets, and pipes leading to septic tanks, restoring water supply, cleaning of the vicinity of campsites, auxiliary facilities, industrial sites, and restoration of garbage dumps.	Compliant
12. Confined Spaces	Records of entry to the tunnel are by individuals signing a register for the whole day. A number of individuals inside the tunnel is recorded timely.	Compliant
13. Excavations	No excavation during this period.	Compliant
C. Health Management		
1. Noise and Vibration	Worked only based on the prescribed hours.	Compliant
2. Manual Handling	There is limited handling machinery, and, in some areas, there are significant manual handling activities in gabion constructions.	Compliant

Issues	Findings	Remarks
3. Chemicals	Warehousing and storage of hazardous waste in a specially designated place with a hard impermeable coating All hazardous waste containers are located away from water sources with labels. Store fuels in the main reservoir tank and fuel trucks used for distribution.	Compliant.
4. Biological Safety	Empty bitumen drums are placed along one side of the ground covered with plastic to avoid any leakage of the remaining and excess chemicals onto the ground. Local villagers requested that the contractor donate the empty drums to their communities.	Compliant.
5. Welfare	Road and warning signs, signboards, bus stops, installation of permanent barricades, guardrails, streetlights are observed throughout the entire project alignment. Camp cleaners and housekeepers cleaned dailies. The Project conducts pavement cleaning through pressurized water spraying at least twice weekly to remove cow and horse manure, ensuring cleanliness and safety along the roadway.	Compliant
6. Behavior	No specific issues have been raised regarding behavior internally between the workforce or with the local population. All grievances raised by the local villagers and project workers were promptly addressed and resolved by the unit head concerned by the contractor.	Compliant
7. Stress	There are sports grounds available at Camp 1.	Compliant
8. Security	Security is provided day and night at different camps. A 15-day rotational setup is arranged to the security personnel.	Compliant
9. Lone/Shift Working	No specific lone work has been carried out by the workforce and generally individuals are working and travelling in group.	Compliant
D. Natural Hazards	Minor soil collapses occurred during spring and early summer seasons along the steep, sloping sections of the project road due to prolonged rainfall and soil saturation.	Complaint. Promptly clean and remove the accumulated soils and debris along the affected drainage canals.

e. Biodiversity conservation

53. Since 2022, the project has undertaken the planting of seedlings to replace trees removed during land clearing and site preparation activities. The planted seedlings are currently in good condition, supported by consistent maintenance measures such as replanting (replacement of the dead seedlings), soil loosening, fertilization, and regular watering. As of the current reporting period, a total of about 10,000 seedlings, representing 100% of the target, have been planted in designated areas along the project road.

54. On 23 January 2023, the contractor formalized a cooperation agreement with Palma Farm to supply seedlings and oversee the implementation of tree planting activities. To date, planting efforts have been primarily focused between km 0+000 and km 29+500. Tree planting will continue on an ongoing basis until the project achieves its targeted seedling replacement goal.

55. The seedlings planted include Pine (*Pinus spp.*), Juniper (*Juniperus communis*), Wild Apple (*Malus sieversii*), Karagoch/Elm (*Ulmus spp.*), Cherry Plum (*Prunus cerasifera*), Silver Wattle (*Acacia dealbata*), and Poplar (*Populus spp.*). Planting is being conducted with a spacing of at least 2 m between each seedling, and compost materials are being added to the planting holes as fertilizer. These planting activities are part of the project's ongoing compliance measures and commitments. Progress on the planting activities is presented in Table 8.

Table 8: Progress of the Planting Activities as of 30 December 2025

Schedule/Year	Target ^a	No. of Seedlings Planted	Accumulative Progress (%)
2021	10,000	430	4.3%
2023		2,244	26.7%
2024 (Jan – Jun)		2,050	47.2%
2024 (Jul - Dec)		1,630	63.54%
2025 (Mar – Jun)		3,646	100%
Total	10,000	10,000	100%

^a A total number of seedlings replacement based on the Biodiversity Management Plan, 2023.

56. During the monitoring period from June to December 2025, observations of fauna primarily focused on animal pathways used by cattle, sheep, horses, and goats. Since the Road Project is classified as Category 3 under the standards of the Republic of Tajikistan, the construction of concrete passages and additional lanes for livestock was not mandated. To enhance the safety and convenience of animal movements within the project site, traffic speed limits and warning signs have been installed along the project corridor. These measures accommodate the movement of animals as they traverse and cross the road for pasture and grazing. Road warning signs for animal zones are used to alert drivers to the presence of domestic animals in the area, which may be a potential hazard. Also, the Project conducts pavement cleaning with a pressurized water spraying at least twice weekly to remove cow and horse manure, ensuring cleanliness and safety along the roadway.

57. **External monitoring.** No external monitoring conducted during this reporting period.

58. **Compliance monitoring.** There is no compliance monitoring conducted during this reporting period (July – December 2025).

59. **Independent compliance monitoring.** There is no independent compliance monitoring conducted during this reporting period (July – December 2025).

60. **Conclusions and next steps.** During the reporting period, the project has taken necessary mitigation and enhancement measures to ensure compliance with environmental, health, safety, and social requirements. A variety of key activities have been undertaken to monitor and address the project's impact, including:

- (i) Continuous monitoring of the contractor's adherence to the project's safeguard policies, and ensuring remedial measures were implemented in the project sites.

- (ii) The project effectively managed and restored spoil disposal areas with efforts to ensure proper handling, sorting, and disposal of solid, medical, and recyclable waste.
- (iii) Efforts to enhance community safety, particularly regarding road safety and noise management, were carried out. The project workers' accommodation and health were prioritized, with adequate facilities provided for both local and foreign workers.
- (iv) The contractor has commenced the dismantling of project-related facilities, including batching plants, sand and gravel yards, and other associated infrastructure. This process is being carried out in accordance with the approved decommissioning plan, which outlines key measures for waste management, spill clean-up, and site restoration.

61. The project has completed the replanting of seedlings to offset for the trees removed during construction. Ongoing environmental monitoring, supplemented by external assessments, ensures continued compliance with environmental standards and regulatory requirements.

62. Despite the effective implementation of mitigation measures, several areas require further attention to address emerging issues:

- (i) The project must conduct a regular clean-up operation for drainage canals affected by soil erosions. Bio-engineering soil erosion control measures must be considered in the future work.
- (ii) As the road project in the operation stage, a proper waste management, spill cleanup, and continuous monitoring following the approved EMP during the first year of its operation.

3. Public consultations and grievance mechanism

63. During the current monitoring period, the project did not conduct any public consultations, and no grievances were received.

64. **Public consultations.** A summary of all project consultations conducted for environmental safeguards is presented in Table 9. No public consultations were held during the current reporting period.

Table 9: Summary of All Project Consultation Conducted for Environmental Safeguards, Including the Current Reporting Period (July – December 2025)

Consultation session	Date	Persons	# Participants	Outcome	Complies with consultation plan? (Y/N)	Follow-up needed? (list)
Project implementation phase, including current reporting period						
1 January – 30 June 2021						
No recorded consultation during this reporting period.						
1 July – 31 December 2021						
No recorded consultation during this reporting period.						
1 January – 30 June 2022						
Information meeting for the community	13 Jan 2022	Residents of different villages across the road project	13	Residents informed about the maintenance and safety of areas, compensation and relocation of trees, labor resources, and GRM of the project.	Yes	Yes – water resources and utilities, tree cutting, tree planting, and GRM
Information meeting for the community	16 Feb 2022	Residents of different villages	12	Residents informed about snow gallery structure, a proposal of including animal	Yes	Yes – the same concerns

		across the road project		pass structures or alternative solutions, construction of bazaars (markets) and mother care room, village access road, maintenance and safety of the dumping areas, labor resources, and GRM of the project.		
1 July – 31 December 2022						
Information session for Kandak residents	14 Dec 2022	Residents of Kandak village	100	Residents informed on issues of improvement of rural roads	Yes	Yes – for health and road safety concerns
1 January – 30 June 2023						
Information session for Kandak residents	9 Mar 2023	Residents of Kandak village	30	Residents informed on issues of improvement of rural roads and community safety	Yes	No
1 July – 31 December 2023						
Information session for women from the (i) Hakimi Jamoat, and (ii) Lugur Jamoat villages.	20 Nov & 28 Nov 2023	Women residents of (i) Hakimi Jamoat, and (ii) Lugur Jamoat villages.	30	Women residents educated on financial literacy and entrepreneurship.	Yes	No
Information session with the affected house owners	30 Nov 2023	Residents along the road project	5	The Project made a consultation with the affected house owners regarding the impact, claim and grievance during the construction.	Yes	No
1 January – 30 June 2024						
Information session for residents about availability of water pipes casing	29 May – 4 June 2024	Residents of different villages along the road project	21	Villages informed about availability of water pipes casing.	Yes	Yes - Relocating the existing water pipes in km13+700
1 July – 31 December 2024						
Community health and safety for villagers	3 Aug 2024	Representatives of Jamoat Hakimi village	2	Residents informed of the warning signages along the road project, and next 3-month schedule	Yes	Yes (Other villages must be informed of the warning and traffic signages of the road project)
Information session for Kandak village	24 Nov 2024	Representatives of Kandak village	2	Residents informed of any possible environmental impacts on the groundwater and surface water of the batching plant operation at km11+300.	Yes	Yes – during and after operation of the batching plant
1 January – 30 June 2025						
No recorded consultation.						
1 July – 31 December 2025 (current reporting period)						
No recorded consultation during this reporting period.						

65. **Grievance mechanism.** Between 1 July 2025 and 31 December 2025, the Project did not receive or observe any complaints from villages along the road project, nor from its remaining project workers (Table 10).

Table 10: Summary of All Grievances Documented During Implementation

Grievance	Date submitted to a project agency	Submitted by (# persons affected)	Grievance first received by	Corrective action	Resolved?	Next steps
Project implementation phase, including current reporting period						
1 January 2021 – 30 June 2021						
No recorded grievance during this reporting period.						
1 June 2021 – 31 December 2021						
Owned trees that were affected	1 Nov 2021	Local affected person #1	Contractor	- Received 400 Somoni as compensation from the Contractor	Yes – 7 November 2021	- Cutting of affected trees
As cook for the Camp, he requested for apron, gloves and shoes	22 Nov 2021	Workers' camp's cook	Contractor	- Requested items were provided by the Contractor	Yes – 23 November 2021	- None
Net fence was damaged by Contractor's vehicles and asked for replacement	23 Nov 2021	Local affected person #2	Contractor	- Replacement net fence was provided	Yes – 26 November 2021	- CSC and PIU to monitor
Local resident reminded the Contractor to plant replacement trees for those affected in the area	23 Nov 2021	Local affected person #3	Contractor	- Around 400 tree samplings were given to the people who had affected trees for planting	Yes – 23 November 2021	- CSC and PIU to monitor
1 January 2022 – 30 June 2022						
During construction work, the trees were under water	29 Mar 2022	Lot owner Umarov Z.	Contractor	- Compensation in the amount of 1500 somoni was given	Yes – 29 March 2022	- None
Use of land for dumping	26 May 2022	Idiev G.	Contractor	- An agreement was drawn up on the use of land for dumping purpose	Yes – 26 May 2022	- None
Use of land for dumping	26 May 2022	Karaev S.	Contractor	- An agreement was drawn up on the use of land for dumping purpose	Yes – 26 May 2022	- None
During the construction work, spring was blocked	31 May 2022	Karaeva B.	Contractor	- The blocked spring was re-stored within 2 days	Yes – 2 June 2022	- CSC and PIU to monitor
Hose damage	26 Jun 2022	Chilaev N.	Contractor	- Compensation in the amount of 1500 somoni was given for the purchase of a hosepipe	Yes – 30 Jun 2022	- CSC and PIU to monitor
Water trap and hose damage	27 Jun 2022	Odinaev H.	Contractor	- Compensation in the amount of 400 somoni was given for the purchase of a hosepipe and a water collector	Yes – 15 August 2022	- CSC and PIU to monitor
Complaint about high dust	30 Jun 2022	Residents of the settlement from km 0+000 to km 0+920	Contractor	- The project road is watered daily more than three times a day	Yes – daily	- CSC and PIU to monitor
1 July 2022 – 31 December 2022						
Asking for some help with the water supply	2 Jul 2022	Kodirov S., Shokhi Aslon Village	Head of Section No. 1, Contractor	- This verbal request was denied because	Yes – 3 July 2022	- None

Grievance	Date submitted to a project agency	Submitted by (# persons affected)	Grievance first received by	Corrective action	Resolved?	Next steps
				this is personal favor.		
Hose damage	3 Aug 2022	Kholov A., Bozorak Village	Head of Section No. 1, Contractor	- A 200 m hose was allocated to replace the damaged one.	Yes – 3 August 2022	- CSC and PIU to monitor
Damage to the pipe and water collector	15 Aug 2022	Odinaev K., Dust Soleh Village	Head of Section No. 1, Contractor	- Compensation was paid for the purchase of a hose amounting to 400 somoni.	Yes – September 2022	- None
Water supply	19 Aug 2022	Makhsumov I., Darai Tutak village	Head of Section No. 1, Contractor	- A hose with a length of 75 m and two couplings (d-45mm) were allocated to the village	Yes – 22 August 2022	- CSC and PIU to monitor
Regarding the placement of soil on a dump at km 25+340, because of which damage was caused to crops and housing	22 Aug 2022	Nazirshoev M., Hakimi Village	Head of Section No. 3, Contractor	- The river's flow has been restored. Soil compaction was carried out at the foot of the dump.	Yes – 25 September 2022	- CSC and PIU to monitor
Hose damage	2 Sep 2022	Dustov N., Dust Soleh Village	Head of Section No. 1, Contractor	- Two pipes were allocated with a length of 6 m, d-50mm	Yes – 2 December 2022	- CSC and PIU to monitor
Fence damage	17 Sep 2022	Abdulkhamidov K., Dust Soleh Village	Head of Section No. 1, Contractor	- Allocated compensation for the purchase of the protective net amounting to 2000 somoni.		- CSC and PIU to monitor
During the excavation work, spring became subterranean	16 Nov 2022	Umarov Z., Kaltaho Village	Head of Section No. 1, Contractor	- For field inspection. No access during the winter season, and springtime is possible. - Inspected during the spring season and the water level was back to normal situation.	Yes – 2 March 2023	- CSC and PIU to monitor
During the excavation work of the Contractor, Khalikova A.'s yard was covered with soils	27 Nov 2022	Khalikova A., Kandak Village	Head of Section No. 1, Contractor	- The yard was cleared of soil by the Contractor's employees	Yes – 2 Dec 2022	- CSC and PIU to monitor
1 January 2023 – 30 June 2023						
The cemetery was flooded. Within 2 days, a drain was dug in the opposite direction.	20 Feb 2023	Umarov Gulmakhmad	Head of Section No. 1, Contractor	- A repair of the drainage canal which the melted water flowed.	Yes – 20 February 2023	- CSC and PIU to monitor
A water pipe at km 7+700 was damaged during the slope excavation	14 May 2023	Ishonov A., Chairman of Darai Tutak village, Obigarm	Head of Section No. 1, Contractor	- Replacement of a water pipe.	Yes – 18 March 2023	- CSC and PIU to monitor

Grievance	Date submitted to a project agency	Submitted by (# persons affected)	Grievance first received by	Corrective action	Resolved?	Next steps
The Rakhimov R.'s yard was covered by sand and soil during the excavation work	17 Mar 2023	Rustam Rakhimov	Head of Section No. 1, Contractor	- Removal of the excess sand and soil near the Rakhimov R.'s yard.	Yes – 18 Mar 2023	- CSC and PIU to monitor
Damage to the fences	29 Mar 2023	Dakhmardaeva Davlatoi	Head of Section No. 1, Contractor	- Repair/Reinstatement of the fencing perimeter.	Yes – 2 Apr 2023	- CSC and PIU to monitor
Request for the construction of a cattle pass	12 Apr 2023	Davlatov Ilkhomiddin (chairman of the village) and villagers	Head of Section No. 1, Contractor	- The construction of a cattle pass was organized.	Yes – 15 Apr 2023	- CSC and PIU to monitor
A water pipe was damaged during earthworks	14 April 2023	Kalandarov Khaibullo	Head of Section No. 1, Contractor	- The water pipe was removed and replaced with a new pipe.	Yes – 15 Apr 2023	- CSC and PIU to monitor
Assistance in the organization of irrigation water	9 June 2023	Umarova Fariza	Head of Section No. 1, Contractor	- Excavation of a drainage canal	Yes – 15 Jun 2023	- CSC and PIU to monitor
Damage to the irrigation/drainage canal	12 Jun 2023	Kodirov Saidahmad	Head of Section No. 2, Contractor	- Repair of the irrigation/drainage canal	Yes – 16 Jun 2023	- CSC and PIU to monitor
Damage to the irrigation/drainage canal	16 Jun 2023	Davlatov Mustafo	Head of Section No. 2, Contractor	- Repair of the irrigation/drainage canal	Yes – 26 Jun 2023	- CSC and PIU to monitor
Damage to the drainage canal	17 Jun 2023	Kasirov Abdumajid	Head of Section No. 2, Contractor	- Repair of the irrigation/drainage canal	Yes – 26 Jun 2023	- CSC and PIU to monitor
Damage to the drainage canal	20 Jun 2023	Gayurov Sabur	Head of Section No. 2, Contractor	- Repair of the irrigation/drainage canal	Yes – 26 Jun 2023	- CSC and PIU to monitor
1 July 2023 – 31 December 2023						
Request for assistance in isolating a size 63 pipes and connectors	22 July 2023	Gulov Mukhabbat. Rogun city, Obigarm Jamoat, Kandak village. Phone: 934650402	Head of Section No. 1, Contractor	- Installation of a pipe and connector across road route.	Yes – 26 July 2023	- CSC and PIU to monitor
Damage to a 250m long hose at km 10+500	22 July 2023	Jalolov Karamatullo, Rogun city, Obigarm Jamoat Kandak village.	Head of Section No. 1, Contractor	- Replacement of a hose	Yes – 31 July 2023	- None
Destruction of a water pipe. Compensation for the loss of a livestock (cow)	25 Jul 2023	Nozilshoev Izatullo, Nurabad district. Hakimi Jamoat, Lyron village.	Head of Section No. 3, Contractor	- Irrigation canal restoration. Allocated the amount of 3,300 Somoni for the compensation of a cow.	Yes – 10 August 2024	- None
Destruction of a water pipe	25 Jul 2023	Khasanov Sherali, Nurabad district. J. Hakimi Jamoat, Lyron village.	Head of Section No. 3, Contractor	- Provision of a water pipe	Yes – 8 August 2024	- None
1 January 2024 – 30 June 2024						
Due to the dumping of rocks (stone, soil and gravel)	20 April 2024	Kholov Olim, Nurabad district, Hakimi community	Head of Section No. 3, Contractor	- Clearing the river of accumulated rocks (stone, soil and gravel). The river	Yes – 27 April 2024	- CSC and PIU to monitor the site

Grievance	Date submitted to a project agency	Submitted by (# persons affected)	Grievance first received by	Corrective action	Resolved?	Next steps
into the Lairon River, the riverbed/ course was blocked and accumulated, which led to the flooding of a farm site where more than 60 trees grow.				was restored to its natural flow.		
Water supply pipes of the Kandak and Darai Tutak Villages along km10 were fully damaged due to the landslide occurred on 9 May 2024.	10 May 2024	Kandak Village at km 10	Head of Section No. 1, Contractor	- The Project and the villagers of Kandak and Darai Tutak collaborated on repairing and installing the water supply pipes. During this period, the Project supplied a daily water tank to ensure the Kandak and Darai Tutak villagers had access to water.	Yes – 11 June 2024	- CSC and PIU to monitor the site
1 July 2024 – 31 December 2024						
Request to build a retaining wall between his house and the road under construction.	16 Jul 2024	Rustam Pulodov Nurabad district. Hakimi jamoat, Zakob village, km 29+455.	Head of Section No. 3, The Contractor	- The Contractor built a retaining wall along the house of the complainant.	Yes – 26 Oct 2024	- CSC and PIU to closely monitor the site
After the construction of a retaining wall at km 27+100, access to Kamolov A.'s yard was blocked.	16 Sep 2024	Kamolov Abdukarim Village. Javji, Jamoati Hakimi Nurabad district	Head of Section No. 3, The Contractor	- The Project provided a metal ladder to access the yard as per the request of the complainant.	Yes – 23 Nov 2024	- CSC and PIU to regularly inspect the affected site.
1 January – 30 June 2025						
- No received and recorded grievance.						
1 July – 31 December 2025 (current reporting period)						
- No received and recorded grievance during this reporting period.						

CSC = construction supervision consultant, PIU = project implementation unit.

66. **Conclusions.** The public consultations undertaken by the project and implementation of the GM comply with the EMP procedures.

4. Training and capacity building

67. Between 1 July and 31 December 2025, there are no any training and capacity building implemented during this monitoring period.

5. Costs of EMP implementation during the reporting period

68. Environmental protection, including monitoring and management, is a budget item in the Bill of Quotation for the project. The costs are shared among the PIU, contractor, CSCs, and the external monitoring consultant. This is covered under a lump sum contract between the MoT

and the contractor. As of this reporting period, the total amount spent on implementing the EMP is approximately TJS795,800 (USD 72,200).

6. Compliance with loan and project assurances

69. The loan agreement and project agreement between the government and ADB includes six assurances (or “covenants”) for environmental safeguards and/or related to environmental issues (Appendix 2). These relate to the timely and effective implementation of the EMP, as well as project-specific assurances tailored to the current project. Compliance with these assurances is a condition of the loan and project agreements. For the current reporting period, six of the assurances are being complied with, and (iii) for all six assurances, compliance should already be achieved. The following corrective actions were developed to achieve compliance for these assurances:

- (i) The State Committee on Environment of Beneficiary granted the final approval of the EIA (positive conclusion of the State Ecological Expertise) on 27 February 2020 and the Recipient has incorporated the relevant provisions from the EMP into the works contract.
- (ii) Environmental Monitoring Reports for the periods January–June 2021, July–December 2021, January–June 2022, July–December 2022, January–June 2023, July–December 2023, January–June 2024, July–December 2024 and January – June 2025 were prepared and publicly disclosed on ADB website.⁷ In addition, IEE reports were developed, approved, and disclosed for the Javoni Bridge improvement subproject, as well as for the additional works involving modifications to the temporary support structures of the Kandak and Karagach tunnels.
- (iii) The Project secured various environmental permits (e.g., a) permissions land use for the construction of the camp, asphalt, and concrete plants and the development of quarries for the extraction, b) special water use, c) discharge of hazardous substances, d) land acquisition for the temporary storing of construction waste, e) remove construction and household waste for storage in specially designated areas) and all applicable laws and regulations relating to the environment, health and safety, environmental safeguards, and all measures and requirements set forth in its EIA.
- (iv) Bidding documents and contracts for various works under the project were prepared including the necessary provisions envisaged in the EIA and EMP.
- (v) During its construction, whenever required necessary, corrective or remedial actions are applied.
- (vi) The budget for all such environmental and social measures was incorporated in the project.
- (vii) Any unanticipated environmental, resettlement or indigenous peoples risks or impacts that arise during construction, implementation or operation of the Project that were not considered in the EIA, and the EMP are to be provided in a written notice.
- (viii) The condition of roads, agricultural land and other infrastructure prior to starting transport of materials and construction is adequately recorded.
- (ix) Made regular repair and maintenance of the access roads, relocation of the existing water mains, water pipelines and transmission lines.
- (x) The Project offset all affected trees by planting replacement seedlings along the roadside.

⁷ Availability of the project's safeguard documents: <https://www.adb.org/projects/52042-001/main#project-pds>

- (xi) The Project reports any actual or potential breach of compliance with the measures and requirements set forth in the EMP and it is part of the environmental monitoring reports.
- (xii) As of 31 December 2025, no violations have been identified during its construction and decommissioning periods.

7. Reporting

70. The project reporting requirements for environmental safeguards are summarized in Table 11 and comprise (i) progress reports from contractors and CSCs to the PIU, and (ii) environmental monitoring reports (EMRs) from the PIU to ADB.

Table 11: Project Reporting Requirements for Environmental Safeguards

Reports	From	To	Frequency	Progress this reporting period	Comments
Construction phase					
Annual report – external monitoring of environmental variables	EES PMC	PIU	Annual	Jan – Dec 2025	For review
EMR (previous EMP implementation)	PIU	ADB	Semi-annual	Jan - Jun 2025	Disclosed by the bank https://www.adb.org/projects/documents/taj-52042-001-emr-6
EMR (overall progress of EMP implementation)	PIU	ADB	Semi-annual	Jan – Jun 2025	For submission, review, and approval by the bank

ADB = Asian Development Bank, CSC = construction supervision consultant, EMP = environmental management plan, EMR = environment monitoring report, PIU = project implementation unit.

71. **Conclusions.** Progress reporting from the PIU to ADB complies with the EMP reporting schedule.

IV. LESSONS LEARNED

72. Key lessons learned during the reporting period for environmental management are the following:

- (i) Attending closely to the concerns of project workers and community members during construction can help minimize environmental impacts, as well as reduce complaints and grievances.
- (ii) Regular and proper maintenance of equipment and machinery is essential to mitigate environmental impacts, such as noise, air pollution, and soil contamination, during construction activities.
- (iii) Effective waste management within the construction camps and surrounding areas is critical to minimizing environmental impacts.
- (iv) Monitoring wastewater effluent is crucial to ensure no significant or critical environmental harm occurs to the surrounding environment and river system during the operation of the batching plant.

- (v) Implementing traffic speed limits and warning signs is essential to improve safety and facilitate animal movements within the project site, as the road project is classified as Category 3 under the Republic of Tajikistan's standards. For certain sections of the road, such as near villages (40 kph), sharp bends (50 kph), and tunnels (40 kph), reducing speed limits is necessary. The design speed of 50 kph is 40 kph lower than the typical rural speed limit in Tajikistan and 20 kph below the 70 kph safe system speed recommended for CAREC countries.
- (vi) Restoring spoil disposal areas to their designated protective or productive uses is essential for long-term environmental sustainability.
- (vii) Tree planting along the road project is vital to promote a green landscape, enhance air quality by absorbing carbon dioxide and releasing oxygen, create habitats for wildlife, improve the area's visual appeal, and provide a more pleasant environment for residents and travellers. Additionally, trees act as natural sound barriers, reducing traffic noise for nearby communities.

73. These lessons will be applied to the project as follows:

- (i) It is worth noting that the project has already established a good relationship with the local communities and other stakeholders. Aside from installing a Complaint Box open 24-hr and 7 days a week, the PIU also entertained any personal suggestions and comments from the local villages involved. It is essential to efficiently resolve any social and environmental issues that may arise during project implementation.
- (ii) Regular monitoring of health and safety of the project workers.
- (iii) Installation of traffic speed limits and warning signs across the road project following the safe system speed recommended for CAREC countries.
- (iv) Restoration of the designated spoil disposal areas.

V. NEXT STEPS

74. During the reporting period, the execution of civil works has demonstrated compliance with the environmental safeguard standards, policies, and procedures mandated by the Republic of Tajikistan and ADB SPS requirements. Additionally, project-specific mitigation measures are implemented in accordance with the stipulated provisions.

75. Before the road project becomes operational, it is recommended that the PIU may collaborate with the local government of Rogun City to install metal, bottle-shaped garbage bins for the collection of plastic bottles. These bins should be placed at all bus stop locations along the project road, along with additional containers for recyclable and non-recyclable materials. The installation of garbage bins in these areas will help prevent plastic waste from being discarded into drainage canals and ensure proper solid waste management in the surrounding.

76. As the project has entered the operational stage, the Project Implementation Unit Road Rehabilitation (PIURR) will continue post-assessment and physical environmental monitoring in accordance with the Environmental Management Plan stipulated in the approved Environmental Impact Assessment (EIA). The PIURR must conduct physical monitoring during the spring and summer seasons. Table 12 presents a summary of the environmental monitoring program for the operational phase.

Table 12: Environmental Monitoring Activities During Operation (First Year)

Subject	Parameter	Type of Monitoring	Frequency	Responsibility
Ambient air quality	(Particulates PM ₁₀ , PM _{2.5} , CO)	Internal	Quarterly and in response to complaints Locations indicated by complaints	PIURR/MOT
Ambient noise quality	Daytime and nighttime noise levels dB(A)	Internal	Quarterly and in response to complaints Locations indicated by complaints	PIURR/MOT
Vibration level	Daytime and nighttime vibration levels dB(A)	Internal	Quarterly and in response to complaints Locations indicated by complaints	PIURR/MOT
Surface water quality monitoring	(pH, suspended solids, BOD, COD, Coliforms, Nitrate, Phosphate, Oil and grease)	Internal	Twice a year In watercourses receiving runoff from the road (50 m upstream and 250 m downstream the point of discharge)	PIURR/MOT
Biodiversity –as detailed within the BMP	As detailed within the BMP	Internal	As detailed within the BMP	PIURR/MOT
Slope stability monitoring for erosion	Whole alignment (including village access roads)	Internal	Twice a year and after heavy rain	PIURR/MOT
Soil quality	Soil quality monitoring	Internal	Following any intensive salt spreading Whole alignment	PIURR/MOT
EHS	Maintenance depots inspections	Internal	Prior to conversion Camps being converted to maintenance depots	PIURR/MOT
	Tunnel inspection and maintenance programme	Internal	In line with appropriate Tajik and international Standards Whole alignment	PIURR/MOT
	Maintenance regime for roads, barriers, bridges, drainage and safety features	Internal	In line with appropriate Tajik and international Standards Whole alignment	PIURR/MOT
	Road safety audits	Internal	Six monthly Whole alignment (including village access roads)	PIURR/MOT
	Regular inspection of scaffolds by competent persons	Internal	After installation, weekly or following modification of inclement weather. All work locations with scaffolds	PIURR/MOT

Subject	Parameter	Type of Monitoring	Frequency	Responsibility
	Regular inspection of fall prevention devices.		Before each use All work locations	PIURR/MOT
	Regular inspection and testing of all lifting equipment		Dependent on type of equipment All work locations	PIURR/MOT
Climate change	Inspection of weather-related damage to assets		Following significant weather events such as flash floods, mudflows and heavy snowfall, and following long periods of dry weather (due to dust) Whole alignment (specifically infrastructure in river valleys)	PIURR/MOT

Source: TAJ – Obigarm Nurobod EIA Volume 1, Table 74 (pp. 343-344).

APPENDIX 1. PHOTOGRAPHS



Inspection to the project road. The completed Obigarm-Nurobod road project inspected in September 2025.



Obigarm-Nurobod Road Project. The project inaugurated the road project on 26 August 2025.

APPENDIX 2. COMPLIANCE WITH ENVIRONMENTAL ASSURANCES

Table 1-1. Compliance with the covenant stipulated in the ADB grant agreement

Schedule	Paragraph	Covenant	Compliance Status
3	3	The Recipient, through MOT, shall not award any Works contract which involves environmental impacts until: - the State Committee on Environment of the Beneficiary has granted the final approval of the EIA; and - the Recipient, through MOT, has incorporated the relevant provisions from the EMP into the Works contract.	<u>Compliant.</u> The State Committee on Environment of the Beneficiary has granted the final approval of the EIA (positive conclusion of the State Ecological Expertise) on 27 February 2020 and the Recipient has incorporated the relevant provisions from the EMP into the works contract.
3	11	<u>Environment</u> The Recipient, through MOT, shall ensure that the preparation, design, construction, implementation, operation and decommissioning of the Project and all Project facilities comply with (a) all applicable laws and regulations of the Recipient relating to environment, health and safety; (b) the Environmental Safeguards; and (c) all measures and requirements set forth in the EIA, the EMP, and any corrective or preventative actions set forth in the Safeguards Monitoring Report.	<u>Compliant.</u> Semi-Annual Environmental Monitoring Reports covering the periods from January–June 2021, July–December 2021, January–June 2022, July–December 2022, January–June 2023, July–December 2023, January–June 2024, and July–December 2024 have been consistently prepared and made publicly available on the ADB website.^{8,9} In addition, IEE reports were developed, approved, and disclosed for the Javoni Bridge improvement subproject, as well as for the additional works involving modifications to the temporary support structures of the Kandak and Karagach tunnels.¹⁰ The Project secured various environmental permits (e.g., (i) permissions land use for the construction of the camp, asphalt, and concrete plants and the development of quarries for the extraction, (ii) special water use, (iii) discharge of hazardous substances, (iv) land acquisition for the temporary storing of construction waste, (v) remove construction and household waste for storage in specially designated areas) and all applicable laws and regulations relating to the environment, health and safety, environmental safeguards, and all measures and requirements set forth in its EIA. The Contractor considered corrective actions outlined in the safeguards monitoring reports during the project construction.
3	17	<u>Safeguards-Related Provisions in Bidding Documents and Works Contracts</u>	<u>Compliant.</u> Bidding documents and contracts for

⁸ Availability (English version): <https://www.adb.org/projects/documents/taj-52042-001-emr-5>

⁹ Availability (Russian version) <https://mintrans.tj/storage/tender/files/0E1a1o5BdPocZj7jk8zLZlwr7vrq259wGaSzbQqC.pdf>

¹⁰ Availability: <https://www.adb.org/projects/documents/taj-52042-001-iee-0>

Schedule	Paragraph	Covenant	Compliance Status
		The Recipient, through MOT, shall ensure that all bidding documents and contracts for Works contain provisions that require contractors to:	various Works under the project have been prepared including the necessary provisions envisaged in the EIA and EMP.
		(a) comply with the measures relevant to the contractor set forth in the EIA, the EMP and the RP (to the extent they concern impacts on affected people during construction), and any corrective or preventative actions set forth in Safeguards Monitoring Reports;	
		(b) make available a budget for all such environmental and social measures;	<u>Compliant.</u> The budget for all environmental and social measures has been part of the project cost.
		(c) provide Recipient, through MOT, with a written notice of any unanticipated environmental, resettlement or indigenous peoples risks or impacts that arise during construction, implementation or operation of the Project that were not considered in the EIA, the EMP and the RP	<u>Compliant.</u> Any unanticipated environmental, resettlement or indigenous peoples risks or impacts that arise during construction, implementation or operation of the Project that were not considered in the EIA, and the EMP are to be provided in a written notice
		(d) adequately record the condition of roads, agricultural land, and other infrastructure prior to starting to transport materials and construction; and	<u>Compliant.</u> The condition of roads, agricultural land, and other infrastructure were thoroughly documented prior to the commencement of material transport and construction activities.
3	18	(e) reinstate pathways, other local infrastructure, and agricultural land to at least their pre-project condition upon the completion of construction.	<u>Compliant.</u> The project has consistently undertaken repairs of access roads and carried out the relocation of existing water mains, pipelines, and transmission lines. Additionally, tree planting has been conducted along both sides of the project road as part of environmental enhancement measures.
		<u>Safeguards Monitoring and Reporting</u>	(a) <u>Compliant.</u> Semi-annual Environmental Monitoring Reports are disclosed on ADB website (in English). The Russian version of the report is published on the website of the Ministry of Transport of the Republic of Tajikistan
		The Recipient, through MOT, shall: (a) submit semiannual Safeguards Monitoring Reports to ADB within one month after the reporting period at the end of each half of the calendar year, and disclose relevant information from such reports to affected persons promptly upon submission;	
		(b) if any unanticipated environmental and/or social risks and impacts arise during construction, implementation or operation of the Project that were not considered in the EIA, the EMP and the RP, promptly	(b) <u>Compliant.</u> COVID-19 HSMP was submitted by Contractor on 8 October 2021 and reviewed by CSC Senior OHS Specialist (SOHSS).

Schedule	Paragraph	Covenant	Compliance Status
		inform ADB of the occurrence of such risks or impacts, with detailed description of the event and proposed corrective action plan;	
		(c) report any actual or potential breach of compliance with the measures and requirements set forth in the EMP or the RP promptly after becoming aware of the breach;	(c) <u>Compliant</u> . The Project reports any actual or potential breach of compliance with the measures and requirements set forth in the EMP and it is part of the environmental monitoring reports.
3	21	<u>Labor Standards, Health, and Safety</u> The Recipient shall ensure that the core labor standards and the Recipient's applicable laws and regulations are complied with during Project implementation. The Recipient, through MOT, shall include specific provisions in the bidding documents and contracts financed by ADB under the Project requiring that the contractors, among other things, (a) comply with the Recipient's applicable labor law and regulations and incorporate applicable workplace occupational safety norms; (b) do not use child labor; (c) do not discriminate workers in respect of employment and occupation; (d) do not use forced labor; (e) allow freedom of association and effectively recognize the right to collective bargaining; and (f) disseminate, or engage appropriate service providers to disseminate, information on the risks of sexually transmitted diseases, including HIV/AIDS, to the employees of contractors engaged under the Project and to members of the local communities surrounding the Project area, particularly women.	<u>Compliant</u> . The relevant specific provisions are included in the bidding documents and contracts.
3	26	<u>Information Disclosure</u> Throughout the period of Project implementation, the MOT shall (a) maintain and regularly update its website with relevant information on the Project implementation and monitoring, and (b) regularly consult with the public and civil society organizations in respect of each of the foregoing matters	<u>Compliant</u> (a) Semi-annual Environmental Monitoring Reports (in Russian) have been published on the website of the Ministry of Transport of the Republic of Tajikistan. (b) Public consultations, along with engagement of local villagers, have been conducted regularly throughout the project.

Table 1-2: List of permits and licenses applicable to the project

Description of Authorization Document	Date of Issue	Issuing Authority	Status/Remarks
Design Stage: Project Feasibility Study and Environmental Impact Assessment			
Conclusion of the State Ecological Expertise (SEE) on the project	27 Feb 2020	Committee for Environmental Protection under the Government of the Republic of Tajikistan (CEPRT)	Submitted by PIURR to SEE of CEP on 11 February 2020 Approved by CEP on 27 Feb 2020
Construction Stage: Permits and Licenses			
License to conduct the type of activity	9 Feb 2022	Ministry of Industry and New Technologies of the Republic of Tajikistan	Issued on 9 February 2022 with License No. 566.
Permission for land use for the construction of the camp, asphalt, and concrete plants and the development of quarries for the extraction of soil for the preparation of building materials (gravel, sand, and crushed stone) and excavation for road pavement	21 May 2022 (land use) 12 Aug 2021 (Quarry)	Local authorities (Hukumats) Local authorities (Environmental Protection Department of Rogun City)	Obtained permission for Land for the Contractor's campsite/office (from Rogun City) on 21 May 2022. Obtained Quarry Permit (No. 175) for specified location in Hukumat, dated 12 Aug 2021.
Permission for special water use	Before and during construction	CEPRT, Tajikgeology (technical water), Ministry of Health and social defense of the population of the Republic of Tajikistan (drinking water)	Permission for the special use of water from the Layron and Lugur Rivers for production and Dzhavji and Kandak Springs for household facilities of "Hunan Road and Bridge Construction Group Company Limited" in the Republic of Tajikistan (No. 224 from 13 February 2021 to 13 Sep 2024).
Permission to cut down trees and shrubs	At the construction stage	CEPRT	Obtained by the Contractor on 22 Jun 2021 with permission No. 2/12 02-1431
Permission for emissions of harmful substances into the atmosphere (MPE) from stationary and mobile sources	At the construction stage	CEPRT	Permission for maximum permissible emissions of harmful substances into the atmosphere (No. 275/3 dated 24 Sep 2021).
Permission for discharge of hazardous substances into water bodies (MPD)	At the construction stage	CEPRT	Permission to standardize production, use, and disposal of waste [except for radioactive waste] (№ 195/14 dated 1 Oct 2021 to 1 Oct 2026).
Permission for land acquisition for the temporary storing of construction waste (substandard soil, old asphalt, dismantled concrete products, etc.)	At the construction stage	CEPRT, Local authorities (Hukumats)	Permission for Disposal Areas of excavated materials (5 sites) obtained, dated 28 Jul 2021, with Permit No. 41. Permission for the storage of ungraded soil at km 0+250, km 1+700, km 2+700, km 3+200, km 9+000 – km 9+700, km 11+800, km 13+000, km 18+500 – km 18+750 dated 9 Jul 2021. Other sites (i.e., km 0+450, km 1+650, km 23+100, km 25+340)

Description of Authorization Document	Date of Issue	Issuing Authority	Status/Remarks
			are for approval by local authorities.
Permission to remove construction and household waste for storage in specially designated areas (disposal areas)	As required	Local authorities (Hukumats)	The Contractor made a contract with Kurbonov Bobishoh on 12 Sep 2021 up to the completion of the construction phase.
An additional place for soil dumping areas at km 28+580	27 Jul 2022	Requested by Hakimidimaad	Approved by PIURR, Chairman of Nurabad District, Chairman of the Land Committee, Head of Architecture and City Construction.
Act on the dump at km 21+000	28 Aug 2022	Requested by Hakimidimaad	Approved by PIURR, Chairman of Nurabad District, Chairman of the Land Committee, Head of Architecture and City Construction.