CENTER FOR EDUCATION PROJECTS IMPLEMENTATION UNIT

GENERAL EDUCATION IMPROVEMENT PROJECT

ADDITIONAL FINANCING

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

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LIST OF ACRONYMS

APL Adaptable Program Lending

BP Bank Policy

CEP Center for Education Projects Implementation Unit

CIF Competitive Innovation Fund

EIA Environmental Impact Assessment

EIAE Environmental Impact Assessment and Expertise

ESMF Environmental and Social Management Framework

ESMP Environmental and Social Management Plan

GBV Gender-Based Violence

GEIP General Education Improvement Project

GRM Grievance Redress Mechanism

HEI Higher Education Institution

ICT Information and Communication Technologies

MESCS Ministry of Education, Science, Culture and Sport

NACET National Center of Education Technology

NGO Non-Governmental Organization

O&M Operation and Maintenance

OP Operational Policy

PPE Personal Protective Equipment

RA Republic of Armenia

SNCO State Non-Commercial Organization

VET Vocational Education and Training

WB World Bank

1. INTRODUCTION

The Republic of Armenia (RA) requested World Bank Additional Financing (AF) for the implementation of General Education Improvement Project (GEIP) aimed at rehabilitation and improvement of selected school infrastructure in various regions of Armenia. High schools were established in Armenia during 2008 – 2011. A number of reforms have been carried out to strengthen the quality of education by introduction of new structural and content measures since then. The World Bank support to high schools had initially been launched during phase one of the Education Quality and Relevance Project (APL 1) and was then continued during phase two of the Education Quality and Relevance Project (APL 2). Activities of this project were mainly directed at the improvement of quality of education, enrichment of resources and facilities of high schools. However, there are many high school buildings which are still in a need infrastructural improvement. These operations were followed by GEIP which commenced in 2014 with the purpose of enhancing the quality of pre-primary and general education and fostering the relevance of tertiary education.

Development objective of the GEIP AF is to: (i) improve school readiness of children entering primary education; (ii) improve physical conditions and the availability of educational resources in upper secondary schools; and (iii) support quality and relevance improvements in higher education institutions in Armenia. It comprises of the following three components: (i) Enhancing the Quality of Pre-Primary and General Education, (ii) Mainstreaming of the Competitive Innovation Fund (CIF) for Higher Education Institutions (HEI) into full implementation, and (iii) Project management, and monitoring and evaluation. The first component will support the enrichment of upper secondary schools. Rehabilitation of four school buildings is planned as part of this activity. The Center for Education Projects Implementation Unit (CEP) under the Ministry of Education, Science, Culture and Sport of the RA (MESCS) that had been administering GEIP will have the overall responsibility for implementing of the GEIP AF as well.

Alike the original project, GEIP AF is classified as environmental category B following the World Bank OP/BP 4.01 Environmental Assessment. GEIP AF will finance similar types of rehabilitation works as supported by the original project. Even though the intended four sub-projects are not known in detail at the stage of the project preparation and detailed designs for works are not available at this point, the types of works to be undertaken and their environmental and social impacts are generally known upfront. Therefore, environmental and social due diligence in the course of GEIP AF preparation implied development of the present Environmental and Social Management Framework (ESMF) through updating of the ESMF used for the implementation of the original project. The ESMF provides general guidelines for applying environmentally sound practices to school infrastructure rehabilitation. According to the ESMF for low-risk construction / rehabilitation activities the checklist-

type Environmental and Social Management Plans (ESMPs) will be developed to ensure that basic good practice measures are recognized and implemented, while designed to be both user friendly and compatible with the WB safeguards requirements. Also, the school buildings selected for rehabilitation under the GEIP AF shall be checked for possibly belonging to the formal list of Armenia's cultural heritage, so that in case any of them carries special historic value the rehabilitation works are designed and conducted in the way respective of a building's conservation needs as required by OP/BP 4.11.

The ESMPs will be developed for all four schools to be rehabilitated under GEIP AF and will be included in the tender documents to ensure proper implementation and monitoring of the proposed mitigation measures. Adherence to the ESMPs in the course of civil works will allow preventing or minimizing possible adverse impacts and will be sufficient for keeping environmental impacts of the Project at the acceptable minimum level.

2. PROJECT DESCRIPTION

GEIP AF aims at supporting the Government of Armenia in two main endeavors: enhancing the quality of pre-primary and general education and fostering the relevance of tertiary education through mainstreaming the Competitive Innovation Fund or expanding it from a pilot program to one with full implementation.

Component 1. Enhancing the Quality of General Education

Subcomponent 1.1. Promoting School Readiness and equal opportunities at the start of General Education. The objective of this subcomponent is twofold: first, it supports the Government's efforts to increase preschool enrollment, focusing on vulnerable populations, as a means of improving the school readiness of five and six-year-old children entering primary education. Second, this component finances activities aimed at improving the quality of preschool education offered by community-based initiatives. By the end of program, it is expected that 90 percent of five and six-year-olds would be enrolled in preschool institutions.

This subcomponent would support the establishment of sustainable, community-based preschool education units under a competitive grant financing scheme. First, a study would be undertaken to identify communities with disadvantaged populations and organizations potentially able to provide preschool education. The study would also identify main shortcomings and issues in the implementation of pre-school education micro-projects undertaken under the ongoing project. Based on the results of this study, the project's competitive grant scheme would be adjusted to serve the needs of the poorest communities. Community leaders, members, parents of students and representatives of potential service providers would be encouraged to participate in the grant-financing mechanism. They would be trained to prepare competitive proposals with the aim of establishing low-cost and sustainable preschool education institutions. The best proposals prepared by communities would be selected based on criteria to be defined under the competitive grant scheme. Priority would be given to communities that either do not have preschools or whose preschool facilities do not meet the demands of their communities. It is expected that about 80 of these institutions would be established with project additional financing.

Subcomponent 1.2. Enrichment of Upper Secondary Schools. The objective of this subcomponent is to strengthen the recently established network of high schools by supporting the rehabilitation of selected facilities in poor physical condition and improvements in all high schools in teaching and learning conditions, including the provision of contextualized digital learning materials in classrooms and modern equipment.

This subcomponent supports the rehabilitation and refurbishment of a limited number of high schools recently designated by the Government. These schools were built

during the Soviet period and present many infrastructure deficiencies, including lack of appropriate heating systems, potential seismic safety issues and humidity problems. It is expected that at least 4 out of a total of 107 high schools in Armenia would benefit from this additional financing. Given that Armenia is a high-risk country in terms of potential earthquakes, the feasibility study for each of the four schools will include an expert assessment of their seismic conditions. The rehabilitation works supported by the project will ensure compliance to seismic resistance standards and where needed, strengthening works will be carried out. To ensure that the newly upgraded school infrastructure is maintained, the component will also support the development and adoption of a school maintenance manual and training in the use of that manual to upgrade the capacity of school managers and administrators in this area. The targeted schools would thus be able to provide improved and safer teaching and learning environments.

Since improving upper secondary education in Armenia requires much more than infrastructure, this subcomponent would also finance activities aimed at improving the teaching and learning conditions of the 107 High Schools. It finances the purchase of modern information and communication technologies (ICT) equipment and the development of contextualized digital learning materials to be used in classrooms in all upper secondary schools in Armenia. This subcomponent also supports training teachers to use of these materials for the benefit of their students. The focus of these training activities would be on using modern teaching methodologies and digital learning materials in the classrooms. To monitor the changes and improvements, the subcomponent would finance classroom observations and other studies. By the end of the project, it is expected that an increased percentage of high school teachers would be competently using computer-assisted teaching methodologies in classrooms.

As part of the Monitoring & Evaluation framework, it is envisioned that focus groups with key stakeholders (parents and other members of the communities affected) will be held on a yearly basis. The purpose of these meetings is to bolster the social accountability of the high school reforms and of the investments made under the project. This endeavor will ensure the MESCS receives feedback from parents and members of the community.

Subcomponent 1.3. Strengthening key institutions for monitoring educational outcomes and monitoring student learning in Armenia. This component improves the capacity of the National Center of Education Technology (NACET) to monitor Armenian schools and provide them with adequate ICT coverage. This subcomponent also provides the financing for the participation of the country in large-scale international student assessment studies.

Starting in 2013, NACET's ICT services have been covering all educational institutions in Armenia, including Vocational Education and Training (VET) and HEIs. NACET is

tasked with managing data from all educational institutions in Armenia and making educational statistics available both to the public and the authorities in a systematic and organized fashion. NACET playing the role of national center for educational statistics and providing decision-makers and key stakeholders with timely and relevant education information on the whole spectrum of Armenia's education system. This subcomponent supports the development of an ICT education strategy for NACET as the current absence of this strategy makes it more difficult to implement ICT-related activities, which includes the integration of information systems and the production of key educational statistics per school and per province. Second, it supports the rehabilitation and refurbishment of NACET facilities, as this Center is outgrowing its current location and its responsibilities are broadening. Third, as NACETis responsible for the operation of Education Management Information System covering all levels of Armenia's education system except for pre-primary education, the subcomponent financed the purchase of state-of-the-art hardware and software platforms to run such information systems in an integrated fashion for general schools, vocational and technical schools, and tertiary education institutions. Fourth, it financed the establishment of technical service mechanisms for the maintenance of hardware and software in Armenian schools. Fifth, it financed the training of NACET staff on management, planning, monitoring and evaluation.

On the user front, this subcomponent financed: (i) training for teachers and non-teaching staff of schools, HEIs and VET institutions on the integration of ICT into teaching and learning processes; and (ii) training for users of NACET's EMIS at the level of provinces and schools on the use of educational statistics produced by these systems. About 3,900 representatives of preschools, schools, HEIs and VET institutions benefits from these training activities. As the integration of ICT into teaching and learning processes is even more critical in rural areas due to the shortage of educational resources there, this subcomponent finances the development of a methodology to foster the use of computers in these classrooms. NACET's education management and information system produces quality educational statistics for policy making and planning at all levels of the education system of Armenia.

Subcomponent 1.4. Supporting further improvements in the quality of education through curriculum revisions. The objective of this subcomponent is to bring the National Curriculum Framework for grades 1-12 into conformity with the requirements of the General Education and State General Education Curriculum law approved by the Government Decree No. 1088, dated July 28, 2011. The curriculum revisions are outcome-oriented and prioritize identifying the key competencies that students should have acquired by the end of each level of education. The project finances technical assistance and consultative workshops to align with the law the National Curriculum Framework, the State Standards for Education, the subject standards and syllabi as well as classroom assessment and student scoring methods.

Component 2. Mainstreaming of the Competitive Innovation Fund (CIF) for Higher Education Institutions into full implementation.

The objective of this component is to support the roll-out of the competitive grant program for HEIs that was developed and piloted under the ongoing project (APL2). The fund supports the best proposals prepared by HEIs with the aim of improving the quality, modernization and particularly the labor-market relevance of the academic programs and increasing efficiency and equity, and the development of new academic programs of HEIs. This component supports the assessment of the piloting of the CIF implemented under APL2 and reviewing the grant-financing scheme based on the findings of this assessment. Under this subcomponent, representatives of HEIs encourage to participate in the CIF program and trained on proposals preparation, project and financial management, procurement, and monitoring and evaluation.

The selection of proposals prepared by HEIs would follow the procedures established in the CIF Operations Manual designed under the APL2 Project, which also defines the set of eligible activities, grant ceiling and transfers mechanism. The establishment of partnerships between HEIs and the private sector aimed at developing and modernizing the higher education sector in Armenia (e.g., by developing academic curricula aimed at to produce graduates with the relevant skills and competences for a full integration into the labor market) incentivizes through the provision of grants.

Component 3. Project Management, Monitoring and Evaluation.

The key objective of this component is to provide continued support for the management and monitoring of project implementation activities and outcomes. This component provides funds for monitoring and evaluation studies and for audits of project financial statements and grants implementation. The MESCS' CEP, as the project implementation unit, would manage procurement, disbursements and financial arrangements, monitor the project and report on its progress.

Specific activities to be supported by the Component are the following:

- Finance a Project Implementation Unit with core staff hired as consultants.
- Implement and manage the procurement processes, disbursements, and financial management, project monitoring, and reporting.
- Acquire minor additions/replacements of office furniture and equipment.
- Finance local travel, utilities and publications, translations, small office repair, office supplies, fuel, Internet service, bank commission charges and vehicle maintenance and repair.
- Finance implementation and management of special studies planned.
- Facilitate coordination, communication flows and dissemination of information with participating institutions.
- Facilitate working group arrangements and the organization of seminars and workshops.

• Provide training to CEP staff in procurement, disbursements, information technology, project management and other areas identified and proposed in the course of project implementation.

3. LEGAL AND REGULATORY FRAMEWORK

3.1. Legal Framework

The Article 10 of the Constitution of the RA (adopted in 1995 and amended in 2015) stipulates that the State is responsible for environmental protection, reproduction, and wise use of natural resources. Since 1991, more than 25 codes and laws as well as numerous by-laws and regulations have been adopted to protect the environment. The list of key environmental laws regulating the field of nature protection of the RA is presented below:

- Law on Ensuring Sanitary-epidemiological Security of the RA Population (1992);
- Law on Atmospheric Air Protection (1994);
- Law on Environmental Impact Assessment and Expertise (2014);
- Law on the Protection and Use of Fixed Cultural and Historic Monuments and Historic Environment (1998);
- Law on Environmental and Nature Use Charges (2016);
- Land Code (2001);
- Water Code (2002);
- Law on Wastes (2004);
- Law on Environmental Control (2005);
- Law on Environmental Oversight (2005);
- Law on Inspection of Use and Protection of Land (2008);
- Code ofSubsoil (2011);
- Order N2-III-11.3 on Establishing Sanitary Norms for Noise in Workplaces, Residential and Public Buildings, and Residential Development Areas in force 13.04.2002;
- Labor Code of The Republic of Armenia (2004);
- Law on Guaranteeing Equal Rights and Opportunities for Women and Men (2013);
- Republic of Armenia Law on Prevention of Violence Within the Family, Protection of Victims of Violence Within the Family and Restoration of Peace in the Family (2017);
- Convention on the Elimination of All Forms of Discrimination Against Women (1979), (Ratify by RA 1993).

Summaries of several laws from the list, which are most relevant to the GEIP AF are presented below:

Law on Environmental Impact Assessment and Expertise (2014)

The Law on Environmental Impact Assessment and Expertise (EIAE), adopted in 2014, provides legal basis for implementation and introduction of state expertise of

planned activities and concept frameworks as well as presents the standard steps of the Environmental Impact Assessment (EIA) process for various projects and activities in Armenia.

This Law provides legal basis for undertaking the State expertise of planned activities and conceptual frameworks as well as sets forth standard steps of the EIA process for various projects and activities. It establishes the general legal, economic, and organizational principles for conducting mandatory state EIA of various types of projects and concepts of sectoral development (energy, mining, chemical industry, construction, metallurgy, pulp and paper, agriculture, food and fishery, water, electronics, infrastructure, services, tourism and recreation, etc.). The planned activities are classified into three categories subject to different levels of EIA according to severity of possible environmental impacts. In addition, an EIA is also applicable to activities which are not listed in the Article 4 Intended Activities Subject to Expertise, but which will be implemented in protected areas, forests, historical monuments and public green spaces. Such activities fall under Category B. This Law specifies notification, documentation, public consultations, and appeal procedures and requirements. The Law establishes that for the operation of any business entity, or implementation of a plan or a program, a positive conclusion on the EIA must be obtained from the State Non-Commercial Organization (SNCO) of the RA Ministry of Environment called Center of Expertise for Environmental Impact Assessment.

According to the Law on EIAE, activities to be financed from the GEIP AF are not subject to EIA, since the project covers only renovation works (new construction, reconstruction, expansion, technical upgrade and liquidation activities are not planned to be implemented as a part of GEIPAF). However, in case the designs include construction of new heating units (the whole structure, not only boiler equipment), EIA may be required depending on heating unit parameters (this should be clarified during design stage based on specific design solutions).

Law on the Protection and Use of Fixed Cultural and Historic Monuments and Historic Environment (1998)

The Law provides the legal and policy basis for the protection and use of such monuments in Armenia and regulates the relations among protection and use activities. Article 15 of the Law describes procedures for - amongst other things - the discovery and state registration of monuments, the assessment of protection zones around them and the creation of historic-cultural reserves. Article 22 requires the approval of the authorized body (Department of Historic and Cultural Monuments Preservation) before land can be allocated for construction, agricultural and other types of activities in areas containing monuments.

According to the Law on Protection and Use of Fixed Cultural and Historic Monuments and Historic Environment, if a school building selected for rehabilitation under the Project is on the formal list of Fixed Cultural and Historic

Monuments approved by the Ministry of Culture, special permit should be obtained from Ministry of Culture in case the works will be implemented in the building exterior (external walls); in case the works are implemented inside the school and will not impact columns and other elements considered to be cultural and historical value – no permit is required to carry out renovation activities.

Law on Atmospheric Air Protection (1994 and last amended in 2007)

This Law regulates the emission licenses and provides maximum allowed loads/concentrations for atmospheric air pollution, etc.

With respect to the renovation activities envisaged under GEIP AF, operation of heating unit / boiler should be carried out in compliance with requirements of the Law on Atmospheric Air Protection.

Land Code (2001)

The Land Code defines the main directives for management use of the state lands, included those allocated for various purposes, such as agriculture, urban construction, industry and mining, energy production, transmission and communication lines, transport, and other purposes. The Code defines the lands under the specially protected areas as well as forested, watered, and reserved lands. It also establishes the measures aimed to the land protection, as well as the rights of state bodies, local authorities, and citizens towards the land.

Land code envisages that agricultural lands should be used only for agricultural purposes, and since some of the project schools can be located in rural communities that do not possess dump sites, attention should be paid to avoid allocation of agricultural lands for waste disposal purposes.

Code of Subsoil (2011)

This Code contains the main directives for use and protection of mineral resources and underground water, including the sanitary protection zones for the underground water resources.

According to the Code of Subsoil, natural construction materials required for the rehabilitation of schools must be purchased from licensed vendors, or works providers contracted under the project must hold or obtain relevant licenses for the extraction of construction materials if they choose to obtain materials on their own.

Water Code (2002)

The main purpose of the Water Code is to provide the legal basis for the protection of the country's water resources, the satisfaction of water needs of citizens and economic sectors through effective management of water resources and safeguarding the protection of water resources for future generations.

According to the Water Code and related legislation, the schools have to possess contracts with water supply and wastewater specialized company (AWS CJSC or other company operating in specific location) to arrange for water supply and wastewater discharge services.

Law on Wastes (2004)

The law regulates legal and economic relations connected to the collection, transfer, maintenance, development, reduction of volumes, prevention of negative impact on human health and environment. The law defines objects of waste usage, the main principles and directions of state policy, the principles of state standardization, inventory, and introduction of statistical data, the implementation of their requirements and mechanisms, the principles of wastes processing, the requirements for presenting wastes for the state monitoring, activities to decrease the amount of the wastes, including nature utilization payments, as well as the compensation for the damages caused to the human health and environment by the legal entities and individuals, using the wastes, as well as requirements for state monitoring and legal violations. The law defines the rights and obligations of the state governmental and local governmental bodies, as legal entities, and individuals.

Legislation on waste pertains to management and disposal of construction waste to be generated during renovation activities. Such waste should be collected and transported to the approved waste disposal sites in accordance with agreement / contract with local regional authorities or organizations specialized in waste transportation and disposal.

Law on Environmental Control (2005)

The Law regulates the issues of organization and enforcement of oversight over the implementation of environmental legislation of the RA and defines the legal and economic bases underlying the specifics of oversight, the relevant procedures, conditions, and relations, as well as environmental oversight in the RA.

Law on Environmental Control specifies the roles of the state entities involved in monitoring of environmental state during implementation of construction activities, such as renovation activities envisaged as a part of GEIP AF.

Labor Code (2004)

This code regulates collective and individual working relations, defines the bases for the establishment, modification and termination of these relations and the order for their realizations, rights, obligations, and responsibilities of subjects of the labor relations, as well as conditions for the providing of security and maintenance of the health of employees.

The objective of the labor legislation is:

- 1) Establish state guaranties for labor rights and freedoms for natural persons, i.e., citizens of RA, citizens of foreign country, persons without citizenship (hereinafter citizen).
- 2) Contribute to the creation of favorable labor conditions,
- 3) Protect the rights and interests of the employees and employers.

Law on Guaranteeing Equal Rights and Opportunities for Women and Men (2013)

This Law regulate the social relations in the field of ensuring of the state guarantees of equal rights and equal opportunities of men and women and establish the basic principles and regulations, relating to the creation of conditions for gender equality in all spheres of the state and social life.

Republic of Armenia Law on Prevention of Violence Within the Family, Protection of Victims of Violence Within the Family and Restoration of Peace in the Family (2017)

This law stipulate legal and organizational grounds for prevention of violence within the family and protection of victims thereof, provide a definition of violence within the family, set forth the competences of bodies designated to prevent violence within the family and protect the victims thereof, identify the types of protective measures, grounds for their use, particularities of reconciliation of victims of violence within the family and perpetrators, and legal protection of information about the victims of violence within the family.

Convention on the Elimination of All Forms of Discrimination Against Women (1979, ratified by RA in 1993)

The Convention guarantees equality and equal protection before the law in existing legal instruments and sets out measures for the achievement of equalitybetween men and women, regardless of their marital status, in all aspects of political, economic, social, and cultural life.

The state has an obligation to eliminate discrimination against women through legal, policy, and programmatic measures. The obligation applies to all spheres of life, as well as matters relating to marriage and family relations, and includes obligations totake all appropriate measures to eliminate discrimination against women by any person, organization, or enterprise.

3.2. Regulatory Framework

This section briefly presents the roles of entities that will be involved in the implementation of GEIP AF, primarily but not exclusively from an environmental perspective.

Ministry of Environment

The Ministry of Environment is responsible for the protection, sustainable use, and regeneration of natural resources as well as the improvement of the environment in the RA. In those areas, the authority of Ministry includes overseeing national policy development, developing environmental standards and guidelines, and enforcement. The ministry implements those functions through the following structural departments:

- Waste and Atmospheric Emissions Management Department;
- Bioresource Management Department;
- Water Resources Management Department;
- Climate Policy Department;
- Atmospheric Policy Department;
- Water Policy Department;
- Forest Policy Department;
- Strategic Policy Department;
- Specially Protected Areas of Nature and Biodiversity Policy Department;
- Land and Underground Resources Policy Department;
- Hazardous Substances and Waste Policy Department;
- Legal Department;
- International Cooperation Department.

Ministry of Environment also undertakes several functions through its main bodies:

- Water Policy Department with its five Basin Management Organizations is the key institution responsible for the water resources management including, but not limited to, the development and implementation of the National Water Policy, National Water Program and basin Management Plans; regulation of water use by issuance of permits for use of surface and ground water resources; assessment and classification of water resources by their use; participation in development of water standards and control of application, etc.;
- State Environmental Expertise SNCO conducts environmental assessments of designs for construction, reconstruction, rehabilitation, and maintenance of water infrastructures according to the requirements of the Armenian legislation and ratified International Agreements and issues experts' conclusions;
- Hydrometeorology and Monitoring Center SNCO was established by the N 81-N decree dated January 30, 2020, of the Government of the RA on the merger

of Environmental Monitoring and Information Center, Forest Monitoring Center, and Hydrometeorology and Atmospheric Impact Services SNCOs, and it is their legal successor according to the acts of transfer. The main subject of activity and objectives of the Organization 1) promoting the rational use of the components of the environment atmospheric air, water resources, flora and fauna, including specially protected areas of nature and forests, protection of lands and subsoil, and natural resources (excluding mineral resources) by observing the components of the environment and the factors affecting them, creating sufficient data to assess the situation, registering, analyzing, providing and maintaining thereof; receiving information describing the state of hydro meteorological elements (atmospheric pressure, wind, humidity, air and water temperature, water level and charge, flood, freezing, etc.) and processes through conducting observations, surveying received information, using, providing, maintaining, assessing and forecasting the situation, as well as ensuring the organization and implementation of works of active influence on atmospheric phenomena and radar observations in the territory of the RA;

- Bioresources Management Agency participates in the environmental impact assessment designs for construction, reconstruction, rehabilitation, and maintenance of infrastructure;
- The objectives of the Committee of Forest are to ensure sustainable management of state forests protection, restoration, afforestation and effective use. The tasks of the Committee are to ensure the implementation of measures to increase the productivity of state forests, to ensure the conservation of the biodiversity of state forests, to ensure the effective use of the environmental, social and economic potential of state forests, to provide the public with clear, complete and reliable information about forest lands and forests.

Ministry of Emergency Situations

The Ministry of Emergency Situations elaborates and implements the policies of the RA Government in the area if civil defense and protection of population in emergency situations. Armenian State Hydro-meteorological and Monitoring Service SNCO is among the structural entities acting within the Ministry of Emergency Situations and conducts regular monitoring of meteorological and hydrological conditions of Armenia through its network of meteorological and hydrological stations and posts.

Ministry of Territorial Administration and Infrastructure

The Ministry of Territorial Administration and Infrastructure of the RA is a central body of executive authority that develops and implements the policy of the Government of the RA in the field of territorial administration and infrastructure management.

Marzpetarans (regional administration bodies) are responsible for administration of public infrastructure falling under the regional jurisdiction. Bodies of local self-government (communities) are responsible for administration of public infrastructure of local significance registered as ownership of communities. The ministry is also responsible for the protection, sustainable use, and regeneration of natural resources

Ministry of Health

Within the structure of the Ministry of Health, the State Hygienic and Antiepidemiological Survey is responsible for coordination of all issues related to health (including those on noise and vibration) and for supervision over implementation of sanitary norms, hygienic and anti-epidemiological measures implementation by organizations and citizens.

Ministry of Labor and Social Affairs

Among other functions, the Ministry of Labor and Social Affairs is responsible for development and implementation of the state policy, legislation and programs in the following areas: social security, labor and employment, social assistance, social assistance to disabled and aged people, social protection of families, women and children, etc.

Ministry of Education, Science, Culture and Sport

The Ministry of Education, Science, Culture and Sport of the RA is a central body of executive authority that elaborates and implements the policy of the Government of the RA in the spheres of education, science, culture, and sport. The Ministry undertakes functions connecting with the cultural and historical heritage through the following bodies:

:

- Agency for Protection of Cultural Heritage provides services in the field of protection of cultural property - illegally exported cultural property, illegal imports, and illegal transfer of ownership of cultural property, prevention and prevention and promote the development of international cultural cooperation and exchange;
- Department for Protection of Historical and Cultural Monuments provides services in the field of historical and cultural monuments preservation, use of historical and cultural monuments and specially protected areas, state registration, examination, preservation, repair, restoration, use, etc.

4. TECHNICAL AND ENVIRONMENTAL STANDARDS AND REGULATIONS

4.1. World Bank's Safeguard Policies

This project will be processed in accordance with World Bank's safeguards policies. However, as the new Environmental and Social Framework of the World Bank became effective since 2018, some additional aspects also should be covered that were not part of the previous safeguards policies. These includes, among others, assessment of risks associated with Gender-Based Violence (GBV) and labor conditions.

WB OP 4.01 Environmental Assessment is considered to be the umbrella policy for the Bank's environmental safeguard policies. These policies are critical for ensuring that potentially adverse environmental and social consequences are identified, minimized, and properly mitigated. These policies receive particular attention during the project preparation and approval process. The World Bank carries out screening of each proposed project to determine the appropriate extent and type of EA to be undertaken. Activities that may trigger other safeguard policies, such as OP 4.12 on Involuntary Resettlement, are not eligible under the AF. The Borrower is responsible for any assessment required by the Safeguard Policies, with general advice provided by the World Bank staff. The safeguard policies and triggers for each policy are presented in the table below:

| Operational Policy | Triggers |
|--|---|
| Environmental Assessment (OP 4.01) | If a project is likely to have potential (adverse) environmental risks and impacts in its area of influence. |
| Forests (OP 4.36) | Forest sector activities and other Bank sponsored interventions which have potential to impact significantly upon forested areas. |
| Involuntary Resettlement (OP 4.12) | Physical relocation and land loss resulting in: (i) relocation or loss of shelter; (ii) loss of assets or access to assets; (iii) loss of income sources or means of livelihood, whether or not the affected people must move to another location. |
| Indigenous Peoples (OP 4.10) | If there are indigenous peoples in the project area, and potential adverse impacts on indigenous peoples are anticipated, and indigenous peoples are among the intended beneficiaries. |
| Safety of Dams (OP 4.37) | If a project involves construction of a large dam (15 m or higher) or a high hazard dam; If a project is dependent upon an existing dam, or dam under construction. |
| Pest Management (OP 4.09) | If procurement of pesticides is envisaged; If the project may affect pest management in the way that harm could be done, even though the project is not envisaged to procure pesticides. This includes projects that may (i) lead to substantially increased pesticide use and subsequent increase in health and environmental risk, (ii) maintain or expand present pest management practices that are unsustainable, not based on an IPM approach, and/or pose significant health or environmental risks. |

| Physical Cultural Resources (OP 4.11) | The policy is triggered by projects, which, prima facie, entail the risk of damaging cultural property (e.g., any project that includes large scale excavations, movement of earth, surface environmental changes or demolition). |
|--|--|
| Natural Habitats (OP 4.04) | The policy is triggered by any project with the potential to cause significant conversion (loss) or degradation of natural habitats whether directly (through construction) or indirectly (through human activities induced by the project). |
| Projects in Disputed Areas (OP 7.60) | The policy is triggered if the proposed project will be in a "disputed area". |
| Projects on International Waterways (OP 7.50) | If the project is on international waterway such as: any river, canal, lake, or similar body of water that forms a boundary between, or any river or body of surface water that flows through, two or more states (or any tributary or other body of surface water that is a component of this waterway); any bay, gulf, strait, or channel bounded by two or more states or, if within one state, re-cognized as a necessary channel of communication between the open sea and other states-and any river flowing into such waters. |

The requirements of RA environmental legislation, as it pertains to the procedures required for the GEIPAF implementation, are in general comparable withthe World Bank policy approaches. However, there are also several differences between local legislation and WB policy requirements, most tangibles of which are summarized below. Armenian EIA terminology considers "environmental assessment" as the review process carried out by the Environmental Expertise of the Ministry of Environment performed on the application of a project proponent for obtaining of the expert conclusion clearing the proposed activities, while the WB OP/BP 4.01 uses this term to describe the environmental impact study carried out by the project proponent. Armenian EIA legislation does not require classification of activities into environmental categories A, B, and C as it is established in OP/BP 4.01, though it distinguishes between activities that require an EIA and those that do not. The national legislation does not provide definition of the ESMP and envisage its development, but it does require that the EIA document carries a list of environmental mitigation measures and describes procedures of their implementation. The national legislation is mostly similar to WB requirements with respect to public disclosure of the EIA documents, however, does not include the requirement of at least 2 public consultations for Category A projects, which is the case with WB OP. Nonetheless, RA is a party to Aarhus convention, thus the public consultation process in carried out in line with the guiding principles of the Aarhus convention. In the meantime, is should be emphasized that the activities to be implemented with the framework of GEIPAF are not subject to EIA, thus the abovementioned differences will not impact the Project implementation.

GEIP AF also triggers World Bank safeguard policy OP/BP 4.11 Physical Cultural Resources. According to the guiding principles of the OP/BP 4.01, the Project is

classified as environmental Category B. Civil works to be undertaken under the project will require (i) environmental screening to ensure that each individual investment also falls under category B, and (ii) site-specific environmental and social management planning for the provision of mitigation measures against potential negative impacts and for the establishment of mechanism for monitoring application of these measures.¹ Also, the school buildings selected for rehabilitation under the General Education Improvement Project shall be checked for possible belonging to the formal list of Armenia's cultural heritage, so that in case any of them carries special historic value the rehabilitation works are designed and conducted in the way respective of a building's conservation needs as required by OP/BP 4.11.

4.2. Permitting

Various permits necessary for accomplishing the works envisaged by the GEIPAF, including data on issuing authorities and tentative timing of obtaining the permit, are summarized in the below table:

| Name of permit | Issuing authority | Permit obtaining stage |
|---|---|--|
| Technical and seismic resistance Expertise | State Expertise | After design stage, prior to bidding |
| Environmental Expertise | Ministry of Environment | After design stage, prior to bidding |
| Construction license | Urban Development commitee | After design stage, prior to bidding (to be possessed by construction contractors submitting their bids) |
| Construction permit | Head of the appropriate community | Prior to construction |
| Lease agreement or ownership documents for construction site | Property owner | Before establishment of the construction site |
| Mining license * | Minister of Territorial Administration and Infrastructure | During construction stage |
| Purchase agreements for the supply of natural construction material | Authorized seller | During construction stage - purchase of the materials |
| Maximum permissible discharge permit | Ministry of Environment | During construction stage |

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¹ The project will not finance any high-risk rehabilitation/construction works that would fall under environmental Category A.

| Name of permit | Issuing authority | Permit obtaining stage |
|--|-----------------------------------|--|
| Agreement for disposal of construction waste | Head of the appropriate community | Before disposal of the waste off- site, at least 3 months prior to issuance of the final certificate |

^{*} If construction materials are purchased, owner of the quarry must have a valid permit from the Ministry of Environment

All of the above permits are relevant for the GEIPAF implementation; however, some of them might not be necessary depending on the nature of works and their organization (e.g., contractor is not requested to have a mining license in case the crushed stone is purchased, however the company producing the crashed stone should possess a valid mining license).

5. ENVIRONMENTAL AND SOCIAL SCREENING

The main purpose of environmental and social screening is to ensure that all environmental issues are properly assessed and adequate solutions to those issues have been provided. Part of the works envisaged by the proposed Project is of construction nature, while the other part of proposed improvements is of rehabilitation nature and will be implemented on existing infrastructure.

The GEIP AF will continue activities started under the parent project and will finance rehabilitation works of the four school facilities, with certain social and environmental impacts. The project, therefore, triggers World Bank OP/BP 4.01 Environmental Assessment. Based on review of available project documents, experience of the parent project and discussions with CEP, works associated with rehabilitation of school buildings are not expected to have significant and irreversible negative impact on the natural or social environment. Rehabilitation works are expected to have minor environmental and social impacts, thus development of site-specific ESMPs should be sufficient (no need for a full-scale EIA and permitting).

Overall, the long term social and environmental impacts of the GEIP AF are expected to be positive, while negative impacts will be limited to the construction phase and be of the limited scope. Based on the nature and scope of the proposed activities, the Project is classified through environmental screening as environmental Category B. All of the possible negative impacts may be effectively mitigated through application of standard good environmental practices. Site-specific ESMPs will be prepared for all school rehabilitation activities included in the Project. ESMPs will specify environmental risks associated with construction and rehabilitation works to be carried out at the respective project sites, recommend respective mitigation measures, and provide monitoring schemes for tracking adherence to the mitigation plans. Adherence to the ESMPs in the course of civil works will be sufficient for keeping environmental impacts of the project at the acceptable minimum level.

AF will also support, through the scaling up of EIP activities, provision of ICT and Science Laboratory Equipment to approximately 200 General Education schools under subcomponent 1.3. CEP will undertake eligibility screening of activities proposed for the project support under subcomponent 1.3 No radioactive or highly toxic materials will be eligible for supply to the laboratories. Environmental and social review of work designs will also be required to ensure that safety of laboratory operation is built into the designs, including safety of power supply and adequacy of ventilation. Precautionary measures will be applied to avoid nuisance to teachers and students in case minor works inside laboratory premises are undertaken while classes are ongoing in the rest of a school building.

GBV risks are low due the past experience of the project and the scale of the works envisioned under the AF. There is no legislation in Armenia that addresses sexual harassment in the workplace, although there is a law on domestic violence, which is considered as incomplete and weakly enforced. Despite government's efforts to reduce gender inequalities in national legislation, a gap between legislation and implementation continues to exist, and gender inequalities are still socially accepted or tolerated. This is particularly the case in rural areas where gender inequalities are historically more entrenched, which makes it more difficult to implement gender policy reform. Thus, despite the low GBV risks associated with projects in Armenia, diligent monitoring will be in place to ensure that the broader challenges at national level do not facilitate project-level activities that might increase GBV risks.

The country provides supporting services for survivors of GBV, including hotlines with psychosocial support and legal services, safe spaces, and shelters as well as strengthens capacity of health workers to manage GBV cases. Communication campaigns and webinars are carried out to inform communities about GBV during COVID-19 and the means of its prevention. There is an application - SafeYOU mobile app - which enables access to professional counseling for women and adolescent girls online and receives alerts from them about potential cases of violence. Age-appropriate articles for women and adolescent girls are included in the mobile app to raise the awareness on GBV prevention and protection related matters. It is accessible, inclusive, child-friendly, age-appropriate, and safe for thousands of women and girls.

The four high schools that are to be rehabilitated under the project, will be implementing the high school curriculum which includes development of a gender sensitive environment, carrying out gender piloting of published school textbooks, including the issue of equal rights for women and men, equal opportunities, developed methodological complexes, programs, textbooks; ensuring gender-sensitive approaches within the framework of the universal inclusion process; and overcoming gender inequality and reducing discrimination in education and science.

The project will have a Grievance Redress Mechanism (GRM) which would ensure that beneficiaries and the wider community have an outlet through which to engage with the Project, provide project staff with practical suggestions/feedback that allows them to be more accountable, transparent, and responsive to beneficiaries and increase stakeholder involvement in the project. The GRM will include GBV-sensitive channels to enable grievances are treated confidentially, assessed impartially, and handled transparently.

Risks associated with the labor will be managed in accordance with the National Labor Code and other relevant legislative pieces. In the country context, there is low risk for children employment, but are risks for unregulated working hours and labor conditions. WB OP/BP 4.11 Physical Culture Resources is triggered, since some of the facilities proposed for improvement within the GEIP AF framework can be considered as cultural heritage. While there is no need of developing a specific report addressing this issue, appropriate provision will be embedded in ESMPs to ensure that the potential risks are identified, and specific mitigation measures are suggested. ESMP will also include details on all permits required with respect to implementing works in the buildings considered as cultural heritage.

6. SENSITIVE RECEPTORS AND POTENTIAL IMPACTS

GEIP AF activities will be carried out on the existing infrastructure in four selected schools.

Rehabilitation and improvement of school buildings will bring positive changes to delivery of education services. In addition, there will be significant cost savings from reduction of operation and maintenance expenses. The expected overall positive environmental and social impacts from the GEIP AF will be long-term and cumulative in nature, ultimately contributing to the increased social and economic benefits of the communities affected.

The potential adverse environmental and social impacts are described below for the construction and operation phases of GEIP AF. In general, the potential adverse environmental impacts associated with rehabilitation works carried out on school buildings and associated infrastructure are expected to be construction-associated, short-term and localized. The vast majority of the potential adverse impacts will be observed during the construction / rehabilitation period only and will mainly occur within the site of works implementation.

Construction phase impacts

Degradation of landscapes and soil erosion. Some of the areas are sensitive to soil erosion; therefore, when undertaking earth works and leveling the area anti-erosive measures will be implemented during the re-cultivation period.

Pollution by construction run-offs. As a result of oil leakage from machinery and stockpiled construction materials, oil products and chemicals can penetrate to the ground water or run off to water recipients.

Impacts on biodiversity. No impacts on biodiversity are expected due to school buildings' rehabilitation because these are the existing buildings situated within settlements where the ecosystems are significantly transformed and already carry significant anthropogenic footprint. The only possible impact on biodiversity may come from mining for aggregates required as a construction material.

Noise, vibration, and emissions. Noise, vibration, and emissions will be generated in the course of the transportation of construction materials and truck traffic. Emission of inorganic dust from digging-loading works and emission of harmful substances and dust from combustion of diesel used by transportation means and machinery occur during the construction works. Welding works cause welding aerosol and manganese monoxide emissions. Concrete mixers work result in concrete dust emissions.

Dust arising from construction works will have negative impact on the ambient air quality, and it is necessary to take effective protective measures to minimize the negative impact, especially in settlements and protected areas. The Law on Atmospheric Air pollution and RA Government Resolution No 192 concerning emission licenses, norms of maximum permitted hazardous atmospheric air pollution emissions from 30.03.1999 deal with these issues.

Generation of excavated materials and construction waste. Demolition debris will be generated during rehabilitation works, including the possibility of asbestos containing roofing material heavily used in construction till recent time. These effects will be localized and will be minimized by means of appropriate removal and disposal procedures, which may include but not be limited to careful selection of waste temporary accumulation sites, clear delineation of these sites to exclude their expansion, prevention of washout of such sites, obtaining written agreement on permanent disposal site with local authorities and timely transportation of waste to the designated dump site.

Health and safety hazards from construction activities. Safety hazards can occur due to violation of proper health and safety practices and may lead to injuries and accidents. Additional hazards can occur if school renovation works are implemented during teaching process or at a time when schoolchildren can access the school building and premises.

Impacts on historic-cultural and archaeological monuments. Some damage can be caused due to improper implementation of renovation activities if a school building selected for rehabilitation is listed as a cultural and/or historic monument.

Operation phase impacts

Safety hazards from operation activities. No major hazards are expected during operation of rehabilitated schools as long as proper operation practices and safety procedures are applied. During the operation period proper operation and maintenance activities have to be ensured.

Impacts on population. Impacts on population and occupation are expected to be generally positive. Rehabilitation of schools will have certain impacts on demographic structure of labor force in the areas affected by the proposed project improvements. The project will create temporary and some permanent job opportunities for the local population (both men and women), as they could be employed during rehabilitation and maintenance. The project would be able to monitor these impacts by applying gender-disaggregated indicators. Availability of modern school in the community will allow more people (especially those having school age children) to stay in the village.

Impact on provision of educational services. Rehabilitation of the school infrastructure will result in significant improvement of conditions of the building where the schoolchildren are studying; overall improvement will also be supported by capacity and curricula building related activities. Rehabilitation of schools will allow to provide educational services without interruptions possible due to the dilapidated state of the existing structures (e.g., during malfunction of heating system, etc.).

Generation of household waste and wastewater. Operation of the school will result in generation of waste and wastewater. Improper and non-timely collection, removal and disposal of waste can lead of odor and aesthetics impacts in the school building and nearby area. Other adverse consequences may constitute worsening of sanitary-hygienic conditions in school area due to accumulation of waste and clogging of sewerage system.

Operation of heating systems. Malfunction of heating system can result on interruption of provision of teaching services during the cold season of the year. Improper operation of heating systems may impact the air quality and lead to pollution of atmospheric air.

7. IMPACT MITIGATION

Mitigation measures that could be used where appropriate (depending on type of infrastructure, volume and type of works, surrounding area, etc.) are separately defined for the design, construction and operation phases. Appropriate measures will be included in the ESMPs.

Design phase

Environmental and social mitigation requirements will be incorporated in the final designs, technical specifications, and bidding documents to be implemented by the construction contractor(s) and the maintaining entity to avoid, prevent, minimize the potential impacts. The final design documents package will include a list suggesting approved borrow pits and agreed spoil disposal sites; permits and agreements to be obtained from the relevant state and local authorities for use of water resources, borrow pits, and sites for disposal of excavated spoils as appropriate; suggested list of construction preparation temporary sites such as access roads, construction camps, transport and machinery sites, storage facilities, etc. The final design documents will provide such technical solutions that will have minimum impact on the natural resources. It will be ensured that the temporary impacts from noise of operating machinery and civil works do not cause direct adverse impacts on nearby residents. Attention will be paid to buildings with structural damages and/or seismic instability and specific measures to strengthen such building will be envisaged by the proposed design solutions. Special attention will be paid to the buildings that represent cultural heritage and the final designs will include all relevant agreements and permits (relevant permits are discussed and presented in section 4.3 of this document).

Construction phase

Preserving landscapes and minimizing soil erosion. To minimize degradation of landscapes and soil erosion the Contractor(s) will use, where possible, existing quarries for required additional materials. Suitable excavated and dredged soils will be preferably used, thus limiting the need for old and new quarries. The permits from the Ministry of Energy and Natural Resources and, as needed, from the local regional authorities will be obtained if the opening and/or use of quarries are required. Access roads will be carefully chosen to minimize impacts on landscape and soil erosion and will be closely monitored to eliminate their unduly expansion during renovation works.

Managing construction run-offs. Existing access roads will be used where possible, thus minimizing the need for establishing the new ones. The top surface of access roads and work areas will be compacted to facilitate water runoff and avoid flooding the area. This may require digging drainage ditches and connecting them to natural

drainage axes / rainwater discharge system (e.g., if available along the nearby road). Sites for storage of oil and lubricants will be properly equipped to minimize the risks of polluting soil and water. The septic tanks to be placed in the construction camp(s) must be made of impermeable material and will be emptied in accordance with applicable rules. The wastewater will be transported by a special truck to a centralized wastewater collector, based on the agreement obtained from the local authorities during the design phase.

Preserving biodiversity. The impact on biodiversity will be minimal, as the works cover renovation of existing facilities. As mentioned above, sourcing construction materials from already operated quarries will be encouraged to minimize negative impacts of new quarries on the landscapes and biodiversity.

Managing noise, vibration, and emissions. Dust-depressing measures aimed at prevention of air pollution through watering of access roads and construction sites will be implemented. During construction, air pollution levels will be increased, and the main pollutants caused by these operations will include exhaust gases emitted by machines and dust caused by the earthwork and stonework. Water sprinkling during construction will alleviate dust impacts. Dust and noise from the construction site will be minimized by using closed/covered trucks for transportation of construction materials and debris. To minimize impacts on nearby residents the vehicles will be equipped with exhaust mufflers and regularly inspected to ensure their proper technical condition. In addition, implementation of renovation works will be carried out only during daytime hours.

Waste management. If the vegetated area is used for establishment of construction site, the topsoil will be scraped and stored in piles not exceeding one meter and will be used afterwards for site restoration. Concrete rubble, debris, and spoils will be transported and disposed in approved disposal sites. Permits from the local regional authorities or contracts with specialized entities will be signed to carry out transportation and disposal of excavated materials and construction waste. Restoration to quasi-original conditions of landscape will be carried out after completion of renovation works and after use of quarries.

Managing safety hazards. No major hazards are expected during the renovation works, as long as proper construction practices and safety procedures are applied. School rehabilitation activities will be undertaken preferably during summer months (non-operation period for school) to minimize hindering the teaching process and to eliminate the risk of accidents involving children. In case renovation activities have to be undertaken in parallel with teaching process, an option of temporary moving the teaching process to a nearby school will be considered. If the latter is impossible, the renovation activities will be limited to a part of the school building that is made inaccessible to schoolchildren (e.g., renovation in carried out on one floor of the

building while teaching is carried out on another only). Personal protective equipment will be applied during implementation of works. In case the works include removal of roof tiles made of asbestos-containing material, the works will be implemented by trained personal using specialized personal protective equipment.

Precautionary measures will be applied to avoid threats to health and safety of people in case minor works inside laboratory premises are undertaken while classes are ongoing in the rest of a school building. Precautionary measures include the following:

- Teachers and students have been notified of the works through appropriate notification at the site of the works;
- The work contractor formally agrees that all work will be carried out in a safe and disciplined manner designed to minimize impacts on the public and environment;
- Ensuring safe and continuous access to all adjacent offices during works inside laboratory premises;
- Worksites are demarcated using taping and are organized the way that piles of construction materials and on-site waste do not hinder access or pose any danger to people passing by;
- Arrangements to remove construction waste quickly upon completion of works and dispose of it at the formally designated landfills /disposal sites;
- Workers' personal protective equipment (PPE) complies with international good practice.

Preserving historic and/or cultural monuments. If a school building selected for rehabilitation under the project is on the formal list of Fixed Cultural and Historic Monuments approved by the Ministry of Culture, special permit should be obtained from Ministry of Culture in case the works will be implemented in the building exterior (external walls); in case the works are implemented inside the school and will not impact columns and other elements considered to be cultural and historical value – no permit is required to carry out renovation activities.

Managing household waste and wastewater. Waste container will be placed near the school area to collect the household waste generated during school renovation. Agreement / contract will be signed with appropriate authority / entity to ensure timely transportation and disposal of waste. Wastewater will be discharged into the centralized sewerage system. If centralized sewerage system is not available in the community, wastewater will be collected in a tank and then periodically removed, transported by specialized organization to a nearby area with centralized sewerage system and discharged into that system.

Rehabilitation works will be carried out in consultation with school administration and representatives of relevant authorities to minimize the adverse impacts.

Operation phase

During operation it is essential that the school structures and associated facilities will be regularly inspected by the MESCS / local regional authorities and be periodically maintained to ensure proper technical state and prevent damages. Periodical maintenance of school structures and associated infrastructure will be cared timely and in due manner. Proper operation of utilities will be carried out to ensure availability of appropriate conditions for schoolchildren.

Household waste management. Waste container will be placed near each school area to collect the waste generated during school operation. Agreement / contract will be signed with appropriate authority / entity to ensure timely transportation and disposal of waste at approved disposal site.

Wastewater management. Some school buildings are already connected to the municipal sewage systems. If a building is not connected, but a municipal collection system exists, the project will explore possibility of connecting a school building as part of its renovation activities. Towards this end, the project will facilitate contracting Armenia Water and Sewerage CJSC, or another organization operating sewage collection system in a community. If centralized sewerage system is not available in a settlement where the school is located, wastewater will be collected in a septic tank and then periodically removed, transported by specialized organization to a nearby area with centralized sewerage collection and discharged into the system.

Electronic waste management. Obsolete electronic equipment from upgrading computers and project-financed electronic equipment at the end of its useful life may cause risks to human health and the environment if not disposed of in an environmentally sound and safe manner. As the country lacks electronic waste recycling/disposal facilities, obsolete equipment shall be safely stored until the licensed facilities are established in the country or before exporting abroad. Relevant provisions are included in the templates for environmental and social screening, impact mitigation, and monitoring tools prepared for the project (Attachment I).

Operation of heating systems. Proper operation and maintenance of heating systems, including regular inspection and service of the systems, will be carried out to ensure uninterrupted operation during heating season, proper implementation of teaching process, as well as for minimizing air pollution.

Maintenance of roofs and utilities. Proper maintenance of roofs and other utilities will be carried out during operation of the renovated school buildings, including regular inspections and repairs as needed. Roofs will be cleaned during winter season after the snowfall to eliminate safety hazard for passing by schoolchildren, parents, and school staff.

Maintenance of school yard and access areas. Regular maintenance of school yard and premises will be ensured by school administrations, so that good sanitary conditions and pleasant environment are maintained. Access areas will be kept free of elements hindering the access to the school building.

8. STAKEHOLDER CONSULTATION

The RA environmental legislation and international agreements regulating public consultation and coordination, as well as information availability to public are listed below:

- The Law on the Environmental Impact Assessment (2014) ensures citizen's right to obtain information concerning the activities that may cause environmental impacts;
- UN/ECE Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Aarhus, 1998; the RA has joined to the Convention on the 14-th of May 2001).

Draft version of the present ESMF was publicly disclosed in Armenian and English languages, and a virtual consultation meeting with stakeholders will be held. Record of public consultation process will be attached to the final iteration of the ESMF.

9. SITE-SPECIFIC ENVIRONMENTAL IMPACT ASSESSMENT AND MANAGEMENT PLANNING

For construction and rehabilitation activities associated with risks not triggering detailed environmental analysis in accordance with the local legislation and WB policies (e.g., rehabilitation of school structures, etc.), the site-specific ESMPs will be developed using the checklist format provided in the below Attachment I of the present ESMF. The final ESMPs will be included in the tender documents and will later be made part of works contracts.

Responsibilities of various organizations with respect to ESMP implementation and monitoring are briefly summarized below:

Design Consultants will be responsible for taking into account environmental and social aspects in the process of their work and strive for minimizing negative impacts through the design solutions. If development of ESMPs is made part of the design consultant tasks, the consultant will also be responsible for conducting this part of work in a participatory manner in consultation with local stakeholders, and for incorporation of stakeholder comments as well as the feedback from the client (CEP) and the World Bank into the final versions of ESMPs.

Environmental Consultants may be hired by CEP for developing ESMPs, if these functions are not integrated into the terms of reference of design consultants.

Works Contractor(s) will be responsible for due incorporation of works and related costs of ESMPs implementation into their bids and adherence to all requirements of ESMPs throughout the contract term. Contractors shall possess all relevant licenses and permits.

Technical Supervisor(s) will be responsible for oversight over the proper implementation of civil works, including adherence to the measures provided in the ESMPs. Technical supervisor will be responsible for identifying any issues, which may arise from inadequate application of mitigation measures provided in ESMPs and recommending corrective actions. Technical Supervisors shall verify that the Contractors possess all relevant licenses and permits. To adequately perform these duties Technical Supervisors must include relevant expertise and skill mix in their team.

CEP will organize development of ESMPs and to ensure their compliance with the requirements of local legislation and relevant WB OPs, share draft ESMPs with the WB, and conduct public consultation meetings. ESMPs will be developed and disclosed in the Armenian and English languages, disclosed in sub-project area, and made available for local stakeholders in a convenient format. CEP will also ensure that ESMPs are included into the tender documents for civil works, so that potential

biddersare able to incorporate costs related to ESMP implementation into their bids. ESMPs will be integrated into the works contracts and be mandatory for implementation like any other clause of works' contracts. CEP also be responsible for monitoring ESMP implementation. Monthly field monitoring checklists will be used for regular environmental supervision of works. Progress reports on the outcomes of environmental supervision will be developed by CEP and submitted to the WB as part of the regular project progress reporting.

Ministry of Environmentis responsible for the protection, sustainable use, and regeneration of natural resources in the RA. Ministry of Environment's authority includes participation in the national policy making in the respective field, development of environmental standards and guidelines, and enforcement. Ministry of Environmentwill exercise the authority of conducting environmental inspections at worksites to oversee compliance with the terms of environmental permits as well as other formal permissions and licenses.

Regional and local authorities approve the technical proposal for construction and issue construction permits. They also regulate transportation, disposal, or recycling of construction waste.

ATTACHMENTS

Attachment I: Environmental and Social Management Checklist for Small Construction and Rehabilitation Activities

General Guidelines for use of ESMP checklist:

For low-risk topologies, such as school and hospital rehabilitation activities, the ECA safeguards team developed an alternative to the current ESMP format to provide an opportunity for a more streamlined approach to preparing ESMPs for minor rehabilitation or small-scale works in building construction, in the health, education and public services sectors. The checklist-type format has been developed to provide "example good practices" and designed to be user friendly and compatible with safeguard requirements.

The ESMP checklist-type format attempts to cover typical core mitigation approaches to civil works contracts with small, localized impacts. It is accepted that this format provides the key elements of an ESMP or an ESMF to meet World Bank's Environmental Assessment requirements under OP 4.01. The intention of this checklist is that it would be applicable as guidelines for the small works contractors and constitute an integral part of bidding documents for contractors carrying out small civil works under Bank-financed projects.

The checklist has three sections:

- <u>Part 1</u> includes a descriptive part that characterizes the project and specifies in terms the institutional and legislative aspects, the technical project content, the potential need for capacity building program and description of the public consultation process. This section could be up to two pages long. Attachments for additional information can be supplemented when needed.
- <u>Part 2</u> includes an environmental and social screening checklist, where activities and potential environmental issues can be checked in a simple Yes/No format. If any given activity/issue is triggered by checking "yes", a reference is made to the appropriate section in the following table, which contains clearly formulated management and mitigation measures.
- Part 3 represents the monitoring plan for activities during project construction and implementation. It retains the same format required for ESMPs proposed under normal Bank requirements for Category B projects. It is the intent of this checklist that Part 2 and Part 3 be included into the bidding documents for contractors, priced during the bidding process and diligent implementation supervised during works execution.

Contents:

- General Project and Site Information
- Safeguards Information
- Mitigation Measures
- Monitoring Plan

PART A: General Project and Site Information

| INSTITUTIONAL | . & ADMINISTRATIVE | | | |
|---|--|-----|---------------------------|----------------------------|
| Country | | | | |
| Project title | | | | |
| Subproject title | | | | |
| Scope of site- specific activity | | | | |
| Institutional arrangements (WB) | Task Team Leade | rs: | Safe | guards Specialists: |
| Implementation arrangements (RA) | Implementing entity: Center for Education Projects (CEP) | | supervisor t from CEP) | Works' contractor (tbd) |
| PROJECT AND | SITE DESCRIPTION | | | |
| Subproject Description | | | | |
| Name of Education Establishment | | | | |
| Address and Location of a School | | | | |
| Land Ownership and Use | | | | |
| Brief Description of Physical and Natural Environment Around the Site; Social and Demographic Context | | | | |
| Location of the Nearest Licensed Construction Materials Sourcing, Quarry, and Water Source | | | | |
| LEGISLATION | | | | |
| National &Local Legislation &Permits that Apply to Project Activity | | | | |
| PUBLIC CONSU | LTATION | | | |

When / Where
the Public
Consultation
Process Will
Take/Took
Place

ATTACHEMENTS

Attachment 1. Site Map

Attachment 2. Photos of the site and interior of the building

Attachment 3. Certificate of State Registration of the User Rights of Real Estate

Attachment 4. Conclusion of the Structural Integrity and Seismic Stability Assessment of the Building

Attachment 5. Construction permit

Attachment 6. Agreement on Waste Disposal

Attachment 7. Minutes of Public Consultation Meeting

PART B: safeguards information

| /ill the site activity | Activity/Issue | Status | Triggered Actions |
|------------------------------------|--|--------------|--------------------------------------|
| clude/involve any f the following? | Building rehabilitation | []Yes []No | If "Yes", See Section A below |
| | 2. New construction | []Yes []No | If "Yes", See Section A below |
| | Individual wastewater treatment system | [] Yes [] No | If "Yes", See Section B below |
| | Historic building(s) and districts | [] Yes [] No | If "Yes", See Section C below |
| | 5. Acquisition of land ² | [] Yes [] No | If "Yes", See Section D below |
| | 6. Hazardous or toxic materials ³ | [] Yes [] No | If "Yes", See Section E below |
| | 7. Electronic waste | [] Yes [] No | If "Yes", See Section F below |
| | 8. Impacts on forests and/or protected areas | [] Yes [] No | If "Yes", See Section Gbelow |
| | Handling / management of medical waste | [] Yes []No | If "Yes", See Section H below |
| | 10. Traffic and pedestrian Safety | []Yes [] No | If "Yes", See Section I below |
| | 11. Social risk | []Yes [] No | If "Yes", See Section J below |

²Land acquisition includes displacement of people, impacts on livelihoods, encroachment on any private property, crops, trees, impacts to buildings or assets that are either owned, transferred, rented or illegally used, for example as a dwelling or to operate a business (kiosks, etc.).

³ Toxic / hazardous material includes but is not limited to asbestos, toxic paints, noxious solvents, removal of lead paint, etc. The roof of the school is made of asbestos-containing tiles. Hazardous Waste Collection and Disposal activities in RA are regulated by the article 13 of RA Law on Waste, RA Government Decision N 2291 dated 17.01.2006, Order of Minister of Nature Protection N 97 dated 10.05.2007 and the injunction of the Minister of Nature Protection No. 430-N as of 25.12.2006.

PART C: Mitigation measures

| ACTIVITY | PARAMETER | MITIGATION MEASURES CHECKLIST |
|----------------------------|--------------------------------|---|
| 0. General Conditions | Notification and Worker Safety | (a) Notify the local construction and environment inspectorates and communities of the upcoming activities |
| | | (b) Notify the public of the works through appropriate notification in the media and/or at publicly accessible sites (including the site of the works) |
| | | (c) Acquire all legally required permits for construction and/or rehabilitation |
| | | (d) Provide workers' PPE compliant with international good practice (always hardhats, as needed masks and safety glasses, harnesses and safety boots) |
| | | (e) Appropriate signposting of the sites will inform workers of key rules and regulations to follow. |
| A. General | Air Quality | (a) Use debris-chutes during interior demolition above the first floor |
| Rehabilitation and /or | | (b) Keep demolition debris in controlled area and sprayed with water mist to reduce debris dust |
| Construction Activities | | (c) During pneumatic drilling/wall destruction, suppress dust by ongoing water spraying and/or installing dust screen enclosures |
| | | (d) Keep the surrounding environment (sidewalks, roads) free of debris to minimize dust |
| | | (e) Disallow open burning of construction / waste material at the site |
| | | (f) Disallow excessive idling of construction vehicles at sites |
| | Noise | (a) Limit construction noise to conventional working hours |
| | | (b) Keep the engine covers of generators, air compressors and other powered mechanical equipment closed during operation, and place equipment as far away from residential areas as possible |
| | Water Quality | (a) Establish appropriate erosion and sediment control measures such as e.g., hay bales and / or silt fences to prevent sediment from moving off site and causing excessive turbidity in nearby streams and rivers. |
| | Waste Management | (a) Identify waste collection and disposal pathways and sites for all major waste types expected from demolition and construction activities |
| | | (b) Separate mineral construction and demolition wastes from general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers |
| | | (c) Collect construction waste and dispose properly to official landfills |
| | | (d) Maintain the records of waste disposal as proof for proper management |
| | | (e) Whenever feasible, reuse and recycle appropriate and viable materials (except asbestos) |

| ACTIVITY | PARAMETER | MITIGATION MEASURES CHECKLIST |
|------------------------------------|------------------------------------|--|
| B. Individual wastewater treatment | Water Quality | (a) Have local authorities approve the approach to handling sanitary wastes and wastewater from construction sites |
| system | | (b) Before being discharged into receiving waters, treat effluents from individual wastewater systems in order to meet the minimal quality criteria set out by national guidelines on effluent quality and wastewater treatment |
| | | (c) Wash construction vehicles and machinery only in designated areas where runoff will not pollute natural surface water bodies. |
| C. Historic building(s) | Cultural Heritage | (a) If rehabilitation works are being undertaken on a building which is enlisted as a historic/cultural heritage, ensure full compliance with additional requirements/regulations that may be imposed by cultural heritage preservation and management authorities |
| | | (b) In case of encountering change find at work site, immediately take all activities on hold and promptly notify the Employer. Do not resume works till formal notification from the Employer. |
| D. Acquisition of land | Land Acquisition Plan/Framework | (a) If involuntary resettlement had not been expected in the works site but its need emerges after commencement of works, do not enter into discussion/confrontation with the affected people; immediately take works on hold and promptly notify the Employer. Do not resume activity at work site until formal notice from the Employer and full resolution of the subject matter. |
| E. Toxic Materials | Asbestos | (a) If asbestos is located on the project site, mark it clearly as a hazardous material |
| | management | (b) When possible, appropriately contain and seal asbestos material to minimize exposure(c) Treat the asbestos prior to removal (if removal is necessary) with a wetting agent to minimize asbestos dust |
| | | (d) Handled and dispose the asbestos by skilled & experienced professionals |
| | | (e) If asbestos material is stored temporarily, securely enclose it inside closed containments and mark appropriately. Take security measures against unauthorized removal from the site(f) Prevent reuse of the removed asbestos material |
| | Toxic / hazardous waste | (a) Provide safe containers for temporarily storage of all hazardous or toxic substances; label them with details of composition, properties and handling information |
| | management | (b) Place containers of hazardous substances in a leak-proof container to prevent spillage and leaching |
| | | (c) Transport the wastes by specially licensed carriers and dispose in a formal landfill (d) Do not use toxic ingredients or solvents, or lead-based paints |
| F. Electronic waste | E-waste | (a) Provide appropriate training to all staff engaged in e-waste management |
| management | | (b) Consider reusing the obsolete equipment and materials where possible |
| | | (c) Ensure that collected e-waste is transported in a way that does not limit the potential for re-use purposes |

| ACTIVITY | PARAMETER | MITIGATION MEASURES CHECKLIST |
|--|---|---|
| | | (d) Handle and store e-waste with due care in order to avoid the release of hazardous substances into the air, water, or soil, as a result of damage and/or leakage |
| | | (e) Clearly mark containers, pallets, or packages containing e-waste |
| | | (f) Not mix e-waste with any other type of waste. |
| | | (g) Secure e-waste storage location and protected against unauthorized entry and theft until transported to the registered collection facility. |
| | | (h) Store e-waste on an impervious surface within a structure or a transportation unit such that it is protected from precipitation. |
| | | (i) Maintain adequate storage space and good housekeeping. |
| | | (j) Undertake recordkeeping to document (i) the types of e-waste collected from schools; and (ii) the quantities of incoming and outgoing e-waste. Document evidence of proper management (e.g., recycled, refurbished, discarded, exported). |
| | | (k) During handling and storage of e-waste, treat devices containing lead-acid batteries as hazardous waste. |
| | | (I) Take measures to prevent e-waste from entering the landfill. |
| G. Affected forests, wetlands and/or protected areas | Ecosystem protection | (a) Do not damage or exploit any recognized natural habitats, wetlands and protected areas in the immediate vicinity of the activity. Prohibit any hunting, foraging, logging or other damaging activities by staff/personnel. |
| | | (b) Undertake a survey and an inventory of large trees in the vicinity of the construction activity, mark and cordon them off with fencing, protect their root system, and avoid any damage to the trees |
| | | (c) Protect adjacent wetlands and streams from construction site run-off with appropriate erosion and sediment control feature to include by not limited to hay bales and silt fences |
| | | (d) Do not use any unlicensed borrow pits, quarries or waste dumps. |
| H. Disposal of medical waste | Infrastructure for medical waste management | In compliance with national regulations, ensure that newly constructed and/or rehabilitated health care facilities include sufficient infrastructure for medical waste handling and disposal; this includes and not limited to: |
| | | Special facilities for segregated healthcare waste (including soiled instruments "sharps", and human tissue or fluids) from other waste disposal; |
| | | Appropriate storage facilities for medical waste are in place; and |
| | | If the activity includes facility-based treatment, appropriate disposal options are in place and operational |
| I.Traffic and Pedestrian Safety | Direct or indirect hazards to public | Ensure that the construction site is properly secured, and construction-related traffic regulated. This includes but is not limited to: |
| | traffic and pedestrians by | Signposting, warning signs, barriers and traffic diversions: site will be clearly visible, and the public warned of all potential hazards |

| ACTIVITY | PARAMETER | MITIGATION MEASURES CHECKLIST |
|----------------|--------------------------------|---|
| | construction activities | Traffic management system and staff training, especially for site access and near-site heavy traffic. Provision of safe passages and crossings for pedestrians where construction traffic interferes. |
| | | Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement |
| | | Active traffic management by trained and visible staff at the site, if required for safe and convenient passage for the public. |
| | | Ensuring safe and continuous access to office facilities, shops and residences during renovation activities, if the buildings stay open for the public. |
| J. Social risk | Public relationship management | (a) Assign local liaison person within Contractor's team to be in charge of communication with and receiving requests/ complaints from local population |
| | | (b) Consult local communities to identify and proactively manage potential conflicts between an external workforce and local people |
| | | (c) Raise local community awareness about sexually transmitted disease risks associated with the presence of an external workforce and include local communities in awareness activities. |
| | | (d) Inform the population about construction and work schedules, interruption of services, traffic detour routes and provisional bus routes, blasting and demolition, as appropriate. |
| | | (e) Limit construction activities at night. When necessary, ensure that night work is carefully scheduled, and the community is properly informed, so they can take necessary measures. |
| | | (f) At least five days in advance of any service interruption (including water, electricity, telephone, bus routes), advice community through postings at the work site, at bus stops, and in affected homes/businesses. |
| | | (g) Address concerns raised through Grievance Redress Mechanism established by the Employer within the designated timeline within the scope of Contractor's liability |
| | | (h) To the extent possible, work camps should not be located in close proximity to local communities |
| | | (i) Siting and operation of worker camps should be undertaken in consultation with neighboring communities |

General Education Improvement Project Environmental and Social Management Framework

| ACTIVITY | PARAMETER | MITIGATION MEASURES CHECKLIST |
|----------|---------------------|--|
| | Labor management | (a) The Contractor will recruit unskilled or semi-skilled workers from local communities to the extent possible. Where and when feasible, worker skills training, should be provided to enhance participation of local people. (b) The Contractor will provide adequate lavatory facilities (toilets and washing areas) in the work site with adequate supplies of hot and cold running water, soap, and hand drying devices. A temporary septic tank system should be established for any residential labor camp and without causing pollution of nearby watercourses (c) The Contractor will raise awareness of workers on overall relationship management with local population, establish the code of conduct in line with international practice and strictly enforce them, including the dismissal of workers and financial penalties of adequate scale. |

PART D: PLAN OF CIVIL WORKS MONITORING

| | What | Where | How | When | Why | Who | | |
|----------|--------------------|----------------------|-----------------------|----------------------------|-------------------|---------------------|--|--|
| Activity | (Is the parameter | (Is the parameter | (Is the parameter | (Define the frequency | (Is the parameter | (Is responsible for | | |
| | to be monitored?) | to be monitored?) | to be monitored?) | / or continuous?) | being monitored?) | monitoring?) | | |
| | CONSTRUCTION PHASE | | | | | | | |
| | (use | field monitoring che | ecklist attached belo | w to fill out this section |) | | | |
| 1. | | | | | | | | |
| 2. | | | | | | | | |
| n. | | | | | | | | |
| | | 0 | PERATION PHASE | | | | | |
| 1. | | | | | | | | |
| 2. | | | | | | | | |
| n. | | | | | | | | |

PART E: PLAN FOR MONITORING E-WASTE MANAGEMENT

| Activity | What (Is the parameter to be monitored?) | Where (Is the parameter to be monitored?) | How (Is the parameter to be monitored?) | When (Define the frequency / or continuous?) | Why (Is the parameter being monitored?) | Who (Is responsible for monitoring?) |
|-------------------------------|---|---|--|--|--|--------------------------------------|
| Provision of ICT equipment | Purchase of ICT equipment from the registered providers | In the provider's office or warehouse | Verification of documents | During the conclusion of supply contracts | Ensure the reliability of ICT equipment and its safety for human health | CEP |
| Generation of packaging waste | Temporary storage of packaging materials in especially allocated waste containers; Timely disposal of packaging waste from work site through municipal system of waste management. | Works site Waste disposal site | Inspection of activities | Periodically during equipment installation and upon its completion | Prevent environmental pollution; Avoid accidents at the work site due to scattered fragments of materials; Retain esthetic appearance of the work site and its surroundings. | CEP Administration of school |
| E-waste minimization | Purchase products with recyclable components; Purchase products with longer warranty period; Select easily upgradeable | In the provider's office or warehouse Premises of school | Verification of documents Inspection of the equipment | During the conclusion of supply contracts | Limit impacts of e-waste on the environment | CEP |

| Onsite collection of e-waste for reuse and recycling | Proper handling of e-waste that does not limit the potential for reuse purposes; Proper collection of e-waste separated from other waste; Collection of e-waste in especially allocated areas in the premises of schools (impervious surface, no direct sunlight and rainfall); Preparation of e-waste for temporary on-site storage through proper packaging and full labeling (details of composition and handling information). | Premises of school | Inspection of activities | During the dismantling of obsolete equipment | Ensure reusing the dismantled equipment where possible; Avoid the release of hazardous substances into the air, water, or soil, as a result of damage and/or leakage; Ensure good housekeeping | CEP |
|--|---|--|--------------------------|--|--|-----|
| E-waste storage | Preparation of premises for on-site temporary storage of e-waste (provision of non-permeable flooring, protection from precipitation, security systems, etc.); Adequately secured storage location, protected against unauthorized entry and theft; Clearly marked containers, pallets, or packages containing e-waste; Safe placement of e-waste for temporary storage. | Temporary storage location for e-waste | Visual inspection | Periodically during storage of e-waste | Prevent whole or components of e-waste containing hazardous substances from dispersal to the environment; Prevent e-waste from entering the landfill; Prevent e-waste from illegal recycling. | CEP |

Attachment II: Monthly Field Environmental Monitoring Checklist

| Site location | | | | | |
|--|-----|-----------|----|-----|----------|
| Name of contractor | | | | | |
| Name of supervisor | | | | | |
| Date of site visit | | | | | |
| Status of civil works | | | | | |
| Documents and activities to be examined | | Stat | us | | Comments |
| | Yes | Partially | No | N/A | |
| Contractor holds license for extraction of natural | | | | | |
| resources | | | | | |
| Contractor holds agreement for final disposal of waste | | | | | |
| Work site is fenced, and warning signs installed | | | | | |
| Works do not impede pedestrian access and motor | | | | | |
| traffic, or temporary alternative access is provided | | | | | |
| Working hours are observed | | | | | |
| Construction machinery and equipment is in standard | | | | | |
| technical condition (no excessive exhaust and noise, | | | | | |
| no leakage of fuels and lubricants) | | | | | |

| Construction materials and waste are transported under the covered hood | | | |
|---|--|--|--|
| Construction site is watered in case of excessively dusty works | | | |
| Contractor's camp or work base is fenced; sites for temporary storage of waste and for vehicle/equipment servicing are designated | | | |
| Contractor's camp is supplied with water and sanitation is provided | | | |
| Contractor's camp or work base is equipped with first medical aid and fire-fighting kits | | | |
| Workers wear uniforms and protective gear adequate for technological processes (gloves, helmets, respirators, eyeglasses, etc.) | | | |
| Servicing and fuelling of vehicles and machinery is undertaken on an impermeable surface in a confined space which can contain operational and emergency spills | | | |
| Vehicles and machinery are washed away from natural water bodies in the way preventing direct discharge of runoff into the water bodies | | | |

| Construction waste is being disposed exclusively in the designated locations | | | |
|---|--|--|--|
| Extraction of natural construction material takes place strictly under conditions specified in the license | | | |
| Excess material and topsoil generated from soil excavation are stored separately and used for backfilling / site reinstatement as required | | | |
| Works taken on hold if chance find encountered and communication made to the State agencies responsible for cultural heritage preservation | | | |
| Upon completion of physical activity on site, the site and contractor's camp/base cleared of any remaining left-over from works and harmonized with surrounding landscape | | | |

Attachment III: Minutes of Public Consultation