



**MINISTRY OF TRANSPORT
THE REPUBLIC OF TAJIKISTAN**

**PROJECT IMPLEMENTATION UNIT
FOR ROAD REHABILITATION**

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

TAJIKISTAN: DANGARA – GULISTON ROAD

Pre-Final Draft Environmental and Social Action Plan (ESAP)

October 2024

Public

Consultancy

KOCKS
INGENIEURE

TABLE OF CONTENTS

TABLE OF CONTENTS.....	2
<u>1 INTRODUCTION</u>	<u>5</u>
<u>2 RATIONALE FOR THE ESAP.....</u>	<u>6</u>

LIST OF TABLES

TABLE 1 – ENVIRONMENTAL AND SOCIAL ACTION PLAN	7
--	---

List of Abbreviation

ACM	Asbestos Containing Materials
ADB	Asian Development Bank
BMP	Biodiversity Management Plan
CESMP	Contractor Construction Environmental and Social Management Plan
CFP	Chance Find Procedure
CH	Critical Habitat
CLO	Consultation Liaison Officer
CSC	Construction Supervision Consultant
EBRD	European Bank for Reconstruction and Development
ESHS	Environmental, Social, Health and Safety
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
E&S	Environmental and Social
ERPP	Emergency Response and Preparedness Plan
EU	European Union
GIP	Good International Practice
GOST	National Standards (Gosudarstvennye Standarty)
HR	Human Resource
HSMP	Health and Safety Management Plan
IEE	Initial Environmental Examination
IFC	International Finance Cooperation
ISO	International Organization for Standardization
LARP	Land Acquisition and Resettlement Plan
MoC	Management of Change
MOT	Ministry of Transport
NTS	Non-Technical Summary
OHS	Occupational Health and Safety
PBF	Priority Biodiversity Feature
PIURR	Project Implementation Unit for Road Reconstruction
PPE	Personnel Protective Equipment
PR(s)	Performance Requirement(s)
Q2	Second Annual Quarter
SE	Supervising Engineer
SE log	Stakeholder Engagement log
SEP	Stakeholder Engagement Plan
SSESMP	Site Specific Environmental and Social Management Plan
SSHSMMP	Site-Specific Health and Safety Management Plan
TMP	Traffic Management Plan

1 Introduction

The European Bank for Reconstruction and Development (the "EBRD" or the "Bank") is considering providing funds to the Government of the Republic of Tajikistan, in collaboration with the Asian Development Bank (ADB), for the reconstruction of the Dangara-Guliston road, a 49 km section of the 1000 km Dushanbe-Khorog-Kulma regional East-West corridor.

The project road is part of the Bokhtar-Okamzor-Dangara-Guliston road, which is an important highway of international importance in Tajikistan. The Dangara-Guliston road crosses three districts (Dangara, Farkhor and A. Hamadoni), connecting the jamoats of Korez, Ismat Sharif and Guliston with the cities of Dangara and Guliston. The existing section of the Dangara-Guliston road belongs to the technical category III road. The width of the existing roadway is from 9.0 to 11.0 m. The roadway surface is heavily damaged by cracks in places and visibility is not ensured. The current technical category of roads does not correspond to the expected future traffic volume. In this regard, it is planned to reconstruct and modernize the Dangara-Guliston road to technical category I (a four-lane high-way).

The project road passes through the following rural villages: Shahbur, Khurramzamin, Buleni poyon, Bakhoriston and Shukhtarar. The beginning of the project road section is taken as a T-junction of Bokhtar - Dangara - Guliston road, on the border of the designed road construction project "Reconstruction of Zebuniso street in Dangara". The end of the designed section is approximately 49 km, taken at the border of the project "Reconstruction of the Guliston-Kulob highway", financed by the World Bank.

The Project Road has deteriorated significantly over the years and is currently in poor condition, with numerous deficiencies and damages. Due to the existing sub-standard technical condition of the road, transportation has become unreliable and costly. The asphalt pavement is severely damaged, and the base, which consists of coarse soil, does not meet GOST standards. The average thickness of the base is 0.20 m. Additionally, there is no functioning drainage system, and various physical and geological processes are further degrading the remaining intact roadbed. In many areas, stagnant water persists for more than 30 days a year, causing flooding of the road embankment. In conclusion, the Project is urgently needed.

2 Rationale for the ESAP

The Project is jointly financed by the Asian Development Bank (ADB) and the European Bank for Reconstruction and Development (EBRD) (jointly the “Financiers”).

Following ADB standards, the project has been environmentally categorized as 'B,' leading to the preparation of an Initial Environmental Examination (IEE). In terms of resettlement considerations, the project is categorized as 'A'.

The EBRD guidelines do not differentiate between environmental and social im-pact categories, and thus the entire Project is categorized as 'A'.

The Environmental and Social Action Plan (ESAP) is a document outlining the actions necessary to be undertaken to implement the projects in line with Financiers safeguards Policies. This document will be an attachment to the legally binding Loan Agreement between the ADB, EBRD and the Government of Tajikistan for the financing of the Project. Implementation of the ESAP will be monitored by the Financiers.

Environmental and Social Action Plan

Table 1 – Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria for Successful Implementation	Status
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	<p>Prepare and submit reports to the Bank on the status of this Environmental and Social Action Plan (ESAP) and environmental and social (E&S – social includes health and safety and labour) performance of the Project, including management of grievances associated with the Project.</p> <p>Lenders Technical Adviser to verify the information reported, and corrective actions plans agreed with PIURR, Supervising Engineer (SE) and Contractors to address any non-conformances with the Banks Performance Requirements (PRs).</p>	Compliance with ADB and EBRD PRs.	EBRD PR1 to PR10 (excluding PR7 and PR9).	PIURR Contractors Supervising Engineer	Semia-annual environmental and social monitoring reports.	Semi-annual submission of reports on progress with implementation of ESAP and E&S performance.	
1.2	<p>Implement Tajikistan ESIA procedure as required by Tajik legislation, authorities and by Financiers.</p> <p>Implement the EIA procedure and obtain relevant permits as required. Develop a permit register to keep track of all project permits required and obtained for the project.</p>	Compliance with all applicable requirements	National legislation and Financiers requirements	PIURR	Before construction activities and not later than Q2 2025	Permits obtained and a permit register developed and maintained	
1.3	Environmental and Social Management	Optimisation of	EBRD PR 1.	PIURR	Appointment of	Develop and	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target Evaluation Criteria for Successful Implementation	Status
	<p>Systems.</p> <p>The MOT / PIURR will ensure that there are adequate resources and capacity provided to ensure the management of ESHS risks of the project. The MOT will ensure as a minimum that the PIURR will appoint ESHS specialists familiar with the EBRD PRs in respect to:</p> <ul style="list-style-type: none"> · Environmental Management · Health and Safety Management; · Social (including Resettlement and Labour Management) · Gender · Community Liaison and Stakeholder Engagement Development and implementation of a formalised ESMS is required and will be supported by the PIU Support consultant. 	environmental and social management through a formalised document and associated system.	Best practice.	with support from external consultants	<p>ESHS staff from prior construction</p> <p>During project implementation Monitoring reports and tools to be established prior to construction.</p>	implement an ESMS.	
1.4	PIURR to ensure implementation of construction works as per tender documentation by the contractor(s), including assessment and documentation of pre-construction conditions of private and public assets alongside the road corridor where works will be carried out (pre-construction survey), and to ensure that all/any accidental damage that occurs consequently to the Project due to construction activities is assessed and adequately compensated in line with	Project specific community risks and impacts are not adequately identified, assessed, and managed	PR1, PR4, PR5	PIURR resources, Contractors (potentially with external consultant support)	As per tender documents but in any case, prior to start of construction works	<p>Work contract including obligation of the contractor(s) to assess private and public assets alongside the corridor:</p> <p>a) Pre-construction Surveys,</p> <p>b) Land Entry</p>	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and Exit for Status
	Project Grievance Mechanism and LARP.					and Land procedures.	Exit
	<p>The Contractor will implement Environmental and Social Management System (ESMS) that is in line with International Standards and Financier requirements.</p> <p>The Contractor will appoint appropriately qualified specialists with the following expertise</p> <ul style="list-style-type: none"> • Environmental Specialist • Health and Safety Coordinator • Social and Land acquisition and Resettlement Specialist. • Biodiversity Specialist • Gender Specialist (With regard to contents and issues the Gender Action Plan is related to also to the tasks of the social expert. Therefore, provided that the assigned social and land acquisition expert offers relevant experience, there is no need to include an additional gender expert in the contractor's safeguard team). 						
1.5	Implement the Environmental Management Plan (appended to Initial Environmental Examination) and Environmental and Social Management	Minimise the environmental impact of the Project activities	EBRD PR 1. Best practise.	PIURR to monitor and ensure implementation	Prior to construction works and as indicated in the EMP, ESMP	SSESMPs and SSHSMPs developed and implemented.	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and Status for
	<p>Plan (ESMP) for the Project appended to the Tender documents to support good environmental & social management practices.</p> <p>This will require development of the sub plans (Site Specific Environmental and Social Management Plans, SSESMPs and Site-Specific Health and Safety Management Plan) listed in the ESMP in line with the EBRD PRs.</p> <p>The following sub Plans to be developed by the Contractor, reviewed and approved by the Supervision Engineer and implemented by the Contractor:</p> <p>Contractor Construction Environmental and Social Management Plan (CESMP) (PR 1)</p> <p>Material and Spoils Management and Disposal Plan (PR 3)</p> <p>Waste Management Plan (PR 3)</p> <p>Land Management and Reinstatement, Including Topsoil Management (PR 3)</p> <p>Water Quality Management Plan (PR 3)</p> <p>Sewage Management Plan (PR 3)</p> <p>Hazardous waste management plan (PR 3)</p> <p>Biodiversity Management Plan (PR 6) (based on the annex 7 of the ESMP)</p>	and encourage continuous improvement		<p>Contractor to develop SSESMPs and SSHSMPs as required in the tender documents</p> <p>CSC to review and approve all ESHS sub plans</p>	and tender documents	<p>Semi-annual records of SE approval of Plans and compliance with Banks PRs.</p> <p>Monitoring Reports.</p>	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and Status for
	Air quality management plan (PR 3) Noise and vibration management plan (PR 3) Asphalt Plant and Borrow pit/Quarry Management plan (PR 3) Traffic management plan (PR 4) / Based on the annex 6 of the ESMP Emergency response plan (PR4) / Based on annex 5 of the ESMP Construction Camp (layout and management plan) (PR 2) Health and Safety Management Plan / Based on annex 4 of the ESMP Chance finds procedure (PR 8) Labour Management Plan (PR 2) / Based on in annex 1 of the ESMP Accommodations Management Plan (PR 2) / Based on annex 2 of the ESMP Operational E&S Management and monitoring plan (PR 3)						
1.6	Contractors to ensure that training is provided to all workers on site ESHS requirements and sub plans (as appropriate). As a minimum all workers and visitors should receive induction training.	Provide relevant information to workers about projects standards, provide appropriate knowledge and instructions to minimise environmental and	EBRD PR 1. Best practice.	Contractors.	Prior to construction start and periodically based on the types of works, E&S risks, updates to site specific plans and changes to labour on site.	Training plan. Records of relevant training,	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria for Successful Implementation	Status
		social impacts of the projects					
1.7	Set-up, maintain and continually review an Environmental, Health, Safety and Social (ESHS) Incident Reporting. Procedure (or equivalent) to maintain records of monitoring, accidents and incidents. The procedure must be fully integrated into the Project and for contractors located on site.	Management of ESHS accidents and incidents.	EBRD PR1 and PR4. Best practice.	Own resources, PIURR and contractors. Supervising Engineer	Set up prior to construction (preconstruction). Monitoring and review during construction (construction).	Incident report to be submitted by contractor. ESHS Incidents to be included in the Monthly progress reports.	
1.8	Develop and implement, a Management of Change Procedure (MoC) which includes the methodology for the assessment of, and where relevant, mitigation of environmental and social impacts of project changes, e.g. design changes, new project components, etc.	Management of Environmental and Social Risks.	PR 1 and PR 5.	Contractors and CSC	Throughout construction phase	Material design changes will be required to have an environmental and social assessment. Material design changes to be notified to the EBRD	
1.9	Develop and implement a Slope Stabilisation Plan to determine specific areas of required slope stabilisation works ahead of construction. There should be consideration of the slope/hilly areas and where potential unstable materials might be identified along the project route.	Management of E&S Risks	EBRD PR 1	Contractors Supervising Engineer	Prior construction to (preconstruction)	Stabilisation plan developed. Stabilisation measures incorporated into design as required	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	Status
1.10	Managing & Monitoring Contractor Performance: PIURR to set up internal mechanisms to monitor and review the environmental and social performance of the Contractor The PIURR to undertake the eLearning course developed by the bank on E&S management of contractors. PIURR experts to provide the Bank with certificates once training is completed (training can be accessed via this link (https://ebrdelearning.com/environmental-and-social-contractor-management-western-balkans-e-learning-course)	Internal organisational capacity within the PIURR	EBRD PR1	PIURR	Prior to first disbursement for	Course completed and certification achieved	
PR2	Labour and Working Conditions						
2.1	Develop and adopt Human Resources Policy (HR Policy) and procedures. The Policy and procedures will cover and ensure compliance with the relevant requirements for the following: (i) Non-discrimination, equal rights and equal pay; (ii) Prevention of child labour and forced labour; (iii) Workers' rights and obligations; (iv) Freedom of association and right to collective bargaining; (v) Informing workers about their rights, obligations, liabilities, and entitlements; (vi) Terms of employment including recruitment, hours of work, overtime	Management labour risks	National labour laws EBRD PR2 GIP	PIURR	Prior to commencing construction works at any Project sites	PR2 aligned HR policy statement and procedures submitted and accepted by EBRD	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and Status for
	arrangements and overtime compensation, rights to refuse overtime requests; (vii) Contractor management; (viii) Workers accommodation: processes and standards – guidance notes by IFC and EBRD 2009; (ix) Commitment to apply zero tolerance for any proven case of gender based violence, workplace harassment and sexual exploitation and abuse; (x) and adoption of the formal grievance mechanism.						
2.2.	Ensure that any accommodation provided to project workers is designed, constructed and maintained in line with EBRD and IFC guidelines for workers' accommodation 2009 and national sanitary norms.	Management of the working conditions risks	National labour laws EBRD PR2 GIP	PIURR Contractor/sub-contractors and	Throughout the project cycle	Inspection reports from Supervision Consultant included into the progress reports and submitted to EBRD	
2.3	Carry out two external labour audits for the Contractor to confirm compliance with PR2 and national labour laws. First audit shall take place once the main project workforce mobilized, whereas the second audit to be implemented during the peak of the construction season. This is in addition to the regular labour monitoring that will be carried out and reported upon by Supervision Consultant to the PIURR and Financiers.	Management of the working conditions risks	National labour laws EBRD PR2 GIP	PIURR and Supervision Consultant	Twice during construction phase	Labour audit reports submitted and accepted by EBRD	
2.4	Develop, implement and communicate a	Manage workers'	EBRD PR 2	PIURR and Contractor	Prior to	Grievance	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria for Successful Implementation	Status
	formal grievance mechanism for all workers (including contractors and subcontractors) involved in the Project, by also including means of making complaints and suggestions anonymously. The worker's GRM is included in the Labour and Working Condition Management Plan.	concerns and a transparent, consistent mechanism for resolution.			construction	mechanism for the Project in place. Grievance and suggestion boxes available across the operating sites.	
2.5	Implement arrangements to maximise the employment of the local population (as far as possible and including training as required), considering the commitments within the Gender Action Plan (GAP). This is included in the ADB document "GREEN ROADS MEASURES IMPLEMENTATION PLAN (June 2024) under the intervention 9.3 LOCAL SOURCING PLAN TO OPTIMIZE ENGAGEMENT OF LOCAL CAPABILITIES. It is considered in the tender documents.	Provision of equal opportunities and improving economic prospects of residents.	EBRD PR 2. ADB Green Corridor Demonstration Project. Green Roads Measures Implementation Plan, June 2024).	PIURR, Contractor	Prior to and during construction.	At the Start of the Contract: The Contractor shall first provide their written proposals for this implementation to the Engineer and Employer for prior approval and shall provide a brief report on the result of his, listing details of the persons recruited. They shall also maintain records on local employment in his monthly reports.	
PR3	Resource Efficiency and Pollution Prevention and Control						

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria for Successful Implementation	Status
3.1	Implement design solutions aimed at mitigating the impact of noise on residential buildings.	Minimise health impact on residents from traffic on the upgraded road.	PR3 National legislation, WHO noise standards	CSC during liability period and PIURR	Post construction, during operation	All applicable standards on air quality and noise are met. Implementation of design solutions confirmed by the Supervision Engineer.	
3.2	Ensure that design-related mitigation measures recommended in the IEE and Supplementary Report (e.g. noise reducing asphalt, drainage network for surface water, erosion protection measures on drainage outlets, oil interceptors on discharge pipes, planting programme for slope stability, animal passes and animal guiding fencing), pedestrian crossings to address severance effects, are implemented during construction.	All environmental and social issues and impacts are addressed where possible by design and implementation.	EBRD PR1/Pr3	General Contractor Verified by Supervision Engineer	During construction	Implementation of design solutions confirmed by the Supervision Engineer.	
	Appropriate siting of construction compounds (away from water courses), appropriate management of construction activities to minimise pollution, generation of waste, discharges to the environment. Prepare and implement relevant SSESMP Plans as outlined in point 1.5						

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria for Successful Implementation	Status
3.3	Develop and implement all monitoring and reporting programs required by the ESMP and sub-plans in line with EBRD PRs, national requirements and tender documentation	Management of project environmental risks	PR 3	PIURR, contractor	During project preparation, construction and operation	Monitoring program developed. It is included in the Environmental Monitoring Plan of the IEE.	
3.4	<p>During construction, develop and implement waste management plan for all wastes, including chemicals, fuel, oil, silt, construction debris, domestic/household solid wastes.</p> <ul style="list-style-type: none"> › All wastes managed in accordance with approved plan. › Reports to authorities as required in permits. › Reports to PIURR by all contractors on amounts, types and management of all solid wastes. › Reports to Bank by PIURR and all contractors on amounts, types and management of all solid wastes. › Immediate report to Bank and relevant authorities of significant incidents and response actions. <p>Establish adequate storage areas for hazardous waste (of sufficient capacity, hard standing, bounded impermeable surface, canopy/roof, and closed with controlled access) to be provided for all facilities and all areas where hazardous waste is generated and managed.</p>	Poor and inadequate management of hazardous waste leading to serious soil and underground water contamination	PR 3	Contractor	During mobilisation and construction	Adequate storage areas for hazardous waste provided in line with relevant requirements.	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and for Status
3.5	<p>Develop and Implement air quality management practices to control construction dust and vehicle emissions during construction including (at a minimum):</p> <p>Periodic observation monitoring for visible dust near construction traffic areas.</p> <p>Implement dust suppression as needed in dry conditions (with water, gravel, etc.).</p> <p>Cover loads as needed to prevent dust.</p> <p>Maintain vehicles and equipment in good running conditions.</p> <p>Respect speed limits in traffic management plan.</p>	Management of E&S risks	PR3	Contractor	Prior to construction	Procedure developed and approved by CSC and PIU	
3.6	<p>During construction, implement noise and vibration management practices to control construction noise and vibration nuisances related to rock excavation, transport of material and construction works, including (at a minimum):</p> <ul style="list-style-type: none"> › Surveying of any protected objects in the construction routes, checking whether noise limits values are met. › Monitoring of noise and vibration standards during construction. 	Management of E&S risks	PR3	Contractor	Prior to construction	Procedure developed and approved by CSC and PIU	
3.7	Develop and implement erosion and	Management of	PR3	Contractor	Prior to	Procedure	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and for Status
	<p>sedimentation control plan for all earthworks and other areas where the ground will be disturbed during construction in accordance with good international practices, including at a minimum):</p> <ul style="list-style-type: none"> › Minimize disturbance on slopes and/in water. › Use best practice to prevent run-off. › Repair ruts and other features caused by work in wet weather. › Segregate topsoil from subsurface material and store in secure area for use. <p>Protect storage pile(s) with covers, including vegetative cover as needed to prevent erosion and desiccation.</p>	E&S risks			construction	developed and approved by CSC and PIU	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	Status
3.8	<p>Develop and implement water management plan (surface and groundwater) with special attention to the locations of drinking water wells.</p> <p>Provide portable toilets or other means to contain sanitary wastes as needed, at all works locations. Discharge wastes to appropriate treatment as required by authorities.</p>	Management of E&S risks	PR3	Contractor	Prior to construction	Procedure developed and approved by CSC and PIU	
3.9	<p>Post construction noise survey</p> <p>Undertake a post construction noise survey (within the first year of operation) in the monitoring points covered by the baseline survey (see IEE and Supplementary Report). Ensure that daytime and nighttime noise emissions from the traffic are measured and comply with national and WHO standards. In case on noncompliance, develop additional mitigation measures to address noncompliance and report to the Financiers.</p>	Management of E&S risks	PR3	CSC PIURR	During operation	Procedure developed and approved by CSC and PIU	
PR4	Health and Safety						
4.1	Develop an Occupational Health and Safety Plan compliant with national	To minimise accidents and	EBRD PR 4. National Health	PIURR, contractor, CSC	Health and Safety Management Plan	Approved Health and Safety Plan in	HSMP outline

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and for Status
	legislation, PR 4 and with international H&S management systems, to cover: <ul style="list-style-type: none"> • Roles and responsibilities • PPE requirements and enforcement mechanisms • Safety training for all personnel in their own language(s). • Implementation of the project ESMP • Development and implementation of the SSHSMP and its' subplans • implementation, including mandatory reporting to PIURR. • Record-keeping, including total workhours, lost workhours due to accidents/incidents, description of lost time • Reporting protocols for incidents, hospitalisations, fatalities, near misses, lost time injuries • Investigation procedure including root cause analysis for incidents, LTIs, near misses, accidents, and development of lessons learned for each case • Internal and external monitoring, checks, audits and inspections • Principles for emergency 	incidents and ensure safety of workers and equipment.	and Safety Requirements.		submitted to EBRD as subplan of the ESMP on August 9, 2024. The HSMP must be updated and revised by the contractor with site specific information and data and submitted to PIURR and CSC 30 days after contract award.	place construction start (approval by CSC, PIURR and EBRD).	has been provided as part of the ESMP (annex 4).

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	Status
	<p>response and evacuation</p> <p>The Health and Safety Plan is provided in annex 4 of the ESMP. This must be revised by the contractor with the site-specific measures as it gives the principles for the development of the SSHSMP and its sub-plans</p>						
4.2	<p>Implementation of the measures of the Road Safety Audit</p> <p>Road safety audits were conducted during the original design phase and as well during the update of the design in April 2024 with the support of an expert consultant from ADB. Findings and measures shall be included in the final design and implemented by the Contractor.</p>	Improved Health and Safety Performance	EBRD PR 4	PIURR, Designer; Design Consultant, Contractor	During Design and construction phase	Road safety audit findings addressed in the technical designs	
4.3	<p>Conduct a road safety audit and address all its findings and recommendations before the road is opened to the members of the public and third-party road users.</p>	Road safety	Financiers' requirements including EBRD PR4, and ADB safeguards National Legislation	PIURR (with support by external consultant)	Before operation	Recommendations and findings of the RSA addressed	
4.4	<p>Develop and implement the Traffic Management Plan</p> <p>A Traffic Management Plan outline is</p>	To minimise accidents and incidents and ensure smoothly running traffic	EBRD PR 4. National Health and Safety Requirements.	PIURR, Contractor, CSC	Before construction	To minimise accidents and incidents of road users and workers.	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and Status for
	provided in annex 6 of the ESMP. This must be revised by the contractor and include site-specific measures. TMP shall address both on-site and off-site risks and impacts for both phases, construction, and operation.	throughout construction phase by minimizing any congestions. Managing traffic related risk for the maintenance of the road during operation					
4.5	Appoint and maintain a H&S expert to be responsible for overseeing OHS for the entire project, to report directly to the PIURR Executive director.	Minimize H&S risks	EBRD PR 4; GIP	PIURR	Appointed prior to construction and prior to operation, maintained at all times during construction and operation.	- Appointment of qualified OHS expert by PIURR; - Provide training for OHS leaders;	
4.6	Develop and implement emergency preparedness and response plans for the operational phase of the road. This should include: <ul style="list-style-type: none"> • Roles and responsibilities • Procedures for responding to different scenarios (fire, flood, traffic accident, etc.) • Resources required (personnel and equipment) and how these will be provided and maintained • Competence and training 	Preparation for emergency situations and potential accidents are managed.	EBRD PR 3, PR 4, national legislation and best practice.	Preparation by contractor. Review and approval by the PIURR and CSC.	Emergency Preparedness and Response Plan was submitted to EBRD as subplan of the ESMP on August 9, 2024. The subplan must be updated and revised by the contractor with site	Approved Emergency Preparedness and Response Plan in place at construction start (approval by CSC, PIURR and EBRD).	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and for Status
	<p>requirements</p> <ul style="list-style-type: none"> Continually review and update, as a minimum annually and after any emergencies or accidents. <p>Outline of an Emergency Response and Preparedness Plan is provided in annex 5 of the ESMP. This must be revised by the contractor with the site-specific measures and develop a specific project ERPP as part of the SSHSMP and its subplans. This will also require the review of contractor emergency response capabilities at work locations, including assessment of existing national and local capabilities for medical, fire and other assistance, and response times for provision of that support. Provide facilities in the Camps if national and local capabilities and / or response times are insufficient.</p>				specific information and data and submitted to PIURR and CSC 30 days after contract award.		
4.7	<p>Develop and implement an inspection and maintenance programme for the road, bridges, tunnels and all safety features during the operational phase. This programme should be in line with the most appropriate Tajik and/or international standards for inspection and maintenance of each type of infrastructure. Any deficiencies identified should be rectified in good time to prevent deterioration of the infrastructure.</p>	Improved health and safety performance	EBRD PR4; and best practice.	PIURR (and maintenance contractors if used)	Program developed prior to operation of road Implementation throughout operational phase	Program developed Resources allocated Inspection and maintenance records	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria for Successful Implementation	Status
	Sufficient resource should be made available to ensure that programs can be implemented to the required standards.						
4.8	<p>Develop and implement a Hazardous Material Management Plans as part of the SSHSMP, including asbestos containing materials (ACM), notably:</p> <ul style="list-style-type: none"> • Prepare an asbestos register to record all ACMs location and condition. • Where any removal of any ACMs is required, a safe system of work will be developed and executed. • The removal of any ACMs will be carried out by trained and competent experts/contractors with experience in removal of ACMs in line with EU Directive 2009/148/EC Requirements on the protection of workers from the risks related to exposure to asbestos at work. • asbestos risk assessment. • awareness trainings for employees and contractors. • adequate waste collection, removal and transportation for disposal. • PPE for employees and 	All environmental issues and impacts are appropriately addressed	EBRD PR3, PR4, ISO 14001, ISO 45001 National legislation, EU Directives and best practice ADB Good Practice Guidance for management and control of asbestos	Contractor (with potentially external support by expert sub-contractors)	Prior and during construction	Developed by contractor and approved by CSC and PIURR of Hazardous Material Management Plan, including ACM	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	Status
	contractors working with asbestos (e.g., hard hats, safety glasses, respirators, gloves, shoes, earplugs, coveralls, vests, and full-body suits);						
4.9	<p>The PIURR, CSC and Contractor ESHS (environmental, social, health and safety) experts to undertake the eLearning course developed by EBRD on Asbestos Awareness. PIURR experts to provide the Bank with certificates of all those rolling out the course once training is completed.</p> <p>Training can be accessed via this link - https://ebrdelearning.com/asbestos-awareness-e-learning-course</p>	Internal organisational capacity of the project teams	EBRD PR4	PIURR CSC Contractor	Prior to first disbursement	Course completed and certification achieved	
4.10	<p>The PIURR, CSC and Contractor ESHS managers, ESHS experts and workers to undertake the eLearning course developed by EBRD on mental health and wellbeing in the workplace. PIURR to provide the Bank with certificates of all those rolling out the course once training is completed.</p> <p>Trainings can be accessed via this link: For Manager, Supervisors and ESHS expert - https://ebrdelearning.com/managing-workplace-mental-health-and-wellbeing-e-learning-course</p>	Internal organisational capacity of the project teams	EBRD PR4	PIURR CSC Contractor	Prior to first disbursement	Course completed and certification achieved	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and for Status
	For workers - https://ebrdelearning.com/mental-health-and-wellbeing-workplace-e-learning-course						
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	Implement the Project's Land Acquisition and Resettlement Plan (LARP) and Livelihood Restoration Plan	Minimisation of impacts of land acquisition. Compensation / restoration of non-avoidable impacts on assets and livelihood.	EBRD PR 5	PIURR and CSC	LARP and Livelihood Restoration Plan ready for implementation before Project start	All project affected people will be compensated for their losses. No risk to livelihood due to Project activities	
5.2	Undertake a completion audit after completion of the Land Acquisition and Resettlement Plan in order to determine whether requirements of PR5 and the provisions of this plan have been met. This completion audit will be undertaken by competent and independent resettlement professional	Compliance with EBRD PR5. Corrective actions	National laws; EBRD PR 5; GIP	Independent Consultant	Upon full completion of land acquisition and restoration of livelihoods.	Completion Audit Report	
PR6	Biodiversity and Living Natural Resources						
6.1	Based on the Annex 7 to ESMP develop and implement detailed Site-specific Biodiversity Management Plan (BMP). Site Specific BMP to be reviewed and	Avoidance, minimisation and compensation of any ecological	EBRD PR 6	PIURR, contractor	CSC, Pre-construction and during construction phase.	Successful implementation of the BMP needs to be documented in	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria for Successful Implementation	Status
	approved by the Supervision Engineer. The contractor will adapt its camp location, work schedules to accommodate implementation of the BMP and relocation of species especially before any excavation or blasting activities. Contractor will deploy enough resources for preconstruction and implementation of the BMP as will be required by the project.	impacts.				the Semi-Annual Environmental Monitoring Reports, which needs to be prepared for ADB and EBRD.	
6.2	Construction camp location The priority search area for a suitable construction site camp location should be outside the hilly area between chainage km 22+000 to km 31+500 and chainage km 38+500 to km 49+000	Avoidance, minimisation and compensation of any ecological impacts.	EBRD PR 6	Contractor CSC	Pre-construction	Avoidance of locating Camps within biodiversity sensitive areas	
6.3	A walkover of the areas where construction activities are scheduled should be completed in advance of construction activities (at least 48 hours before the start of any works, including early earthworks/vegetation clearing) to identify specific biodiversity features to be protected during construction. This walkover should be undertaken by a suitably experienced biodiversity specialist. Findings from this walkover should be incorporated within the specific contractor Biodiversity Management Plan.	Minimise potential ecological impacts	EBRD PR 6	Contractor – Biodiversity specialist.	Prior to works commencing.	Where relevant: Ecological surveys results Ecological survey reports	
6.4	Fencing and Marking of Habitats of Gecko	Minimise potential	EBRD PR 6	Contractor	Prior to works	Where relevant:	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria for Successful Implementation	Status
	and Agama In order to protect these species from construction impacts 2 habitat areas of 5 ha size need to be fenced and adequately marked as off-limits for any construction activities and purposes. Exact location of these areas will be identified in Spring/Summer 2025 and communicated to CSC.	ecological impacts			commencing.	Ecological surveys results Ecological survey reports including mapping of these buffer areas and	
6.5	Works timing During the bird nesting season which includes the time period from 01st of March to 30th of September no tree felling, and no cutting / excavating of the cliffs, identified as bird nesting sites is allowed.	Minimise potential ecological impacts	EBRD PR 6	Contractor	During construction phase.	Where relevant: Ecological surveys results Ecological survey reports BMP implementation	
6.6	Additional biodiversity surveys for supplementing the baseline and update the BMP data shall be conducted: Survey of habitats of Gecko and Agama (September/October 2024) Spring 2025 supplemental biodiversity baseline surveys (divided into 4 sub-tasks: 1 Gecko/agama (June 2025) 2 Tortoise survey (April 2025) 3 Raptor and vulture nest survey (March to July 2025) 4 Habitat/rare plants survey (April 2025)	Risk of loss of biodiversity	EBRD PR 6	PIURR (with support of external expert consultant)	Habitat survey for Gecko and Agama September/October 2024 August 2025 all tasks completed besides roadkill survey. Roadkill survey completed 6 Months prior of construction activities and 6	No net loss of any identified PBF (Priority Biodiversity Features). The results of the investigations are documented in reports. BMP updated and implemented by	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and for Status
	PBF/CH Assessment for gecko, agama and all other potential CH and PBF triggers including tulips, bird nesting, tortoise etc. Roadkill survey prior and post construction Based on the findings of the additional surveys update the Site Specific Biodiversity Management Plan.				months after start of operation phase.	contractor, CSC and PIURR	
PR8	Cultural Heritage						
8.1	Implementation of an archaeological chance find procedure (CFP)	Potential damage to archaeological artefacts due to construction activities, particularly earthworks.	EBRD PR 8	Preparation by contractor. Review and approval by archaeological institute, PIURR and CSC.	To be provided by contractor as part of his SSESMP 30 days after contract award.	Chance finds procedure developed and implemented Contractor staff trained	
PR10	Information Disclosure and Stakeholder Engagement						
10.1	Ensure stakeholder engagement activities include the following: - Disclosure and maintenance in public domain of the Non-Technical Summary (NTS), Stakeholder Engagement Plan (SEP) and Land Acquisition and Resettlement Plan (LARP) and provide evidence of their periodic review and update as necessary. - Documentation of all stakeholder activities set out in the SEP including the	Information dissemination and continuous engagement with affected stakeholders, improvement of stakeholder awareness and compliance with EBRD PRs 1, 4, 5	EBRD PR10	A SEP, NTS and LARP have been prepared and disclosed by the PIURR. PIURR will be responsible for maintaining up-to-date project documents and allocated Community Liaison Officer will be responsible for coordination of	Disclose prior to construction (pre-construction) and regular maintenance throughout Project duration. Other stakeholder engagement activities pre- and construction and	Evidence of stakeholder engagement activities documented and reported to the EBRD through AESR	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and Status for
	<p>logging of grievances and their resolution to inform the annual monitoring report.</p> <ul style="list-style-type: none"> - Regular consultations with affected landowners and users on both permanent and temporary land acquisition (including selection of location of camps, underpasses, bus stops, rest areas and potential new quarries) in line with LARP; - Promoting and organising consultations / focus groups targeted specifically at women and other vulnerable groups in the Project area, both prior to construction and during the construction phase. - Organising a series of road safety awareness sessions for schools in the Project area and continue these on a six-monthly basis throughout the construction phase. Provide children with reflective badges to fix to their coats and school bags as part of these sessions. - Consulting with women on road safety and providing them with fair and equal representation in decision-making situations and providing them with greater awareness of road safety from a gender and children's perspective. - Developing outreach and campaign promoting gender and children-responsive road safety. - Fully implementing the grievance 	and 10.		stakeholder engagement activities within the PIURR and the communities and local government	during construction as appropriate.		

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and Status for
	mechanism as defined in the SEP. Establish interface arrangements between the PIURR SEP and the Contractor SEP, including routine meetings and reporting on stakeholder issues and grievances						
10.2	Consultation report prepared and disclosed as part of ESIA pack in two languages. Assign a CLO at PIURR team to implement SEP and handle project grievances including reporting. Regularly update SEP and share with Financiers SE log semi-annually.	Information dissemination and continuous engagement with affected stakeholders, improvement of stakeholder awareness and compliance with EBRD PRs 1, 4, 5 and 10.	EBRD PR 10	PIURR The documents including the IEE prepared under the ADB contract to be disclosed by the PIURR. The following documents have been prepared: <ul style="list-style-type: none"> • Supplementary ESIA • ESMP • LARP • Livelihood Restoration Plan • SEP • NTS and • ESAP PIURR will be responsible for maintaining up-to-date	Disclose prior to construction (preconstruction) and regular maintenance throughout Project duration.	All required documents disclosed on PIURR website prior to selection of contractors and maintained during and post construction.	

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Responsibility	Needs, Timetable	Target Evaluation Criteria Successful Implementation	and Status for
				project documents.			
10.3	Implementation of the Stakeholder Engagement Plan	Information dissemination and continuous engagement with affected stakeholders,	PR 10	PIURR, CSC, Social Expert	Design phase and construction phase	Conducted stakeholder consultations and meetings need to be documented in the Semi-Annual Social Monitoring reports to be prepared for ADB and EBRD.	