

Environmental and Social Management Plan (ESMP)  
Social Safety Net Project  
Sudan

SFG1577

December 29, 2015

**PART I: Activity Description**

**Introduction**

1. **Sudan has suffered from years of conflict, and deep-seated security issues have severely hampered the country's long-term economic and social stability.** In spite of Sudan rising to lower middle income status in the last decade due to oil wealth, the country is marked by deep poverty and inequality. Sudan's poverty rate is estimated at 46 percent and recent fuel subsidy reforms and subsequent price increases are estimated to have increased the poverty rate.

2. **To contain the deterioration of the country's fiscal balance, the Government of Sudan started implementing a reform package in September 2013 including measures to reduce public expenditures, remove subsidies on petroleum products and wheat, and adjust the exchange rate.** Particularly, the reduction of fuel subsidies is estimated to have had significant direct and indirect effects on Sudan's population including the poor and most vulnerable. A World Bank Paper on the Distributional and Fiscal Impacts of the Fuel Subsidy Reform shows that about 1.2 million Sudanese could fall into poverty due to the direct and indirect effects of the fuel price increases. Even so, fuel product subsidies in Sudan continue to be very large. The subsidy reducing effects of the price adjustments in 2011–13 have largely dissipated as a result of currency depreciation and the related increase in international fuel prices denominated in domestic currency.

3. **Social Protection has increasingly been acknowledged by the Government as an important instrument to counter the negative effects of the fuel subsidy reforms, fight poverty and improve social cohesion.** In response to the fiscal situation in the country, the Government of Sudan created an ambitious Social Protection Program called the *Social Initiative Program* (SIP). This comprehensive program seeks to target poor households nationwide with a comprehensive set of social protection interventions including cash transfers, health insurance, micro-finance and other complementary measures targeting the poor. The SIP was initiated through a Presidential Decision in 2011 and is financed by the Ministry of Finance and Economic Planning (MoFEP). It is administered by the federal Ministry of Welfare and Social Security (MoWSS) in collaboration with its implementing agencies, namely the Zakat Chamber, the National Health Insurance Fund (NHIF), and the Savings and Social Development Bank (SSDB), all mapped to the MoWSS. The reduction of fuel subsidies is expected to free up much needed resources to provide funding for this program.

4. **Request for World Bank Support.** The Government has requested World Bank support in helping improve the effectiveness, impact and responsiveness of the SIP's flagship activity, the Cash Transfer Program, and in piloting a new productive safety net approach. These two interventions are viewed as complementary vehicles for mitigating the impact of the recently introduced fuel subsidy reforms and contribute to greater coherence and synergies among programs and approaches.

5. **Relationship to Interim Strategy Note (ISN 2014-2015).** Social Protection is featured under the second pillar of the Bank’s ISN as a mechanism to help minimize the social cost of fiscal adjustment and cushioning the impact of reduction of subsidies on the poor. At the request of the government, the Bank has provided guidance on policy options for cushioning this impact as well as an analysis and technical assistance to improve social protection in Sudan and understand the strengths and weaknesses of current programs. Based on this work, the ISN envisions support for the reform of the social protection system to integrate disparate programs, improve efficiency, targeting, and develop graduation mechanisms.

6. **The Safety Net Project seeks to implement the approach outlined in the ISN.** Through Technical Assistance it will support improvements to the implementation of the Government’s cash transfer program under the SIP. In addition, it will support the introduction of a ‘productive safety net’ approach by linking cash transfers to work requirements that will also produce productive assets for the communities. By combining the activities of the MoWSS (managing the SIP) and those of the Community Support Unit (CSU; the MoWSS unit that will manage cash for work activities), it will help develop complementary safety net measures and build links among programs, thus harnessing synergies between safety nets and other social protection interventions.

7. The Project design takes into account the need to:

- Provide the poor population with income support and other services to cushion the negative effects of the price increases;
- Ensure coverage of the extreme poor in Sudan (the bottom quintile), scaling up and down as needed;
- Effectively reach the poorest through efficient, transparent and reliable procedures; and
- Support the piloting of a *productive cash for work program* which creates temporary employment and can be scaled up (as part of the safety net interventions) to help the poor cope with the increases in food prices during the lean season.

## **Project Objective**

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8. The Project Development Objectives of the project is to strengthen the capacity of the MoWSS to transparently and effectively implement the national CT Program, and to pilot a PSN approach for poor households.

## **Project Description**

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9. The project will have two components:

**Component 1: Strengthening the implementation of the MoWSS’s CT Program by putting in place key building blocks of a national safety net (\$3.12 million, of which US\$3.00 million Bank financed and US\$120,000 GoS contribution)**

10. Component 1 aims to improve the effectiveness of the MoWSS's CT Program through three main areas of intervention, summarized below. This component will finance technical assistance for the MoWSS, training, goods and services, and incremental operating costs (e.g., for monitoring of programs).

11. ***Strengthen the institutional capacity of the MoWSS (US\$0.92 million)***. This area will enhance the institutional capacity of the MoWSS through technical assistance and provide the building blocks for training and capacity-building activities. To this end, the component will: (i) review, update, and document the processes and procedures for the SIP program; (ii) improve the SIP's FM and cash payments process to beneficiaries; (iii) develop complaints and grievance redress procedures for targeting and payments under the CT Program; (iv) develop an evaluation strategy and implement selected evaluations/assessments; and (v) provide assistance for the implementation of the MoWSS's advocacy and communications strategy to strengthen outreach to beneficiaries and key stakeholders under the CT Program. The Project will provide adequate funding for a Project Coordination Unit (PCU) located within the MoWSS. The PCU provide advice on critical policy issues, enhancing the efficiency of Project coordination, implementation and management, and strengthened quality control. As part of fostering sustainability and integrating transfer of knowledge to MoWSS staff, the PCU will consist of GoS seconded staff and external consultants with the necessary qualifications to enhance its capacity to manage Project coordination, fiduciary aspects and M&E. The incremental operating costs of the unit as well as the financial audits for the Project will also be financed under Component 1. Training and capacity building will be available for the MoWSS and other relevant stakeholders to enhance coordination, communication, and integration of SIP programs.

12. ***Establish an MIS for the CT Program within the MoWSS (US\$1.64 million)***. This area will fund the piloting required to establish an integrated MIS to support the functional processes of the CT Program through technical assistance, software development, and technological infrastructure (hardware, connectivity, etc.). The newly created MIS for the CT Program will include a centralized architecture, with a centralized database, and a web-based system that will function at all offices of MoWSS (federal and state) and implementing agencies. MoWSS staff will be trained to use the new MIS, which will integrate information management, rationalize customer service processes and protocols, and increase user friendliness and accessibility of information. Network connectivity will be provided as part of the program to federal offices of the Zakat Chamber, the NHIF, and the CSU, and to federal and state offices of the MoWSS. MoWSS federal and state offices will also be equipped with computing equipment and necessary peripherals to use the integrated MIS effectively. Technical assistance will be provided for software development and data processing to establish a CT Program beneficiary registry. Datacenter hosting services will be provided for centralized hardware, connectivity, storage, and database administration.

13. ***Strengthen the targeting system of the CT Program (US\$0.56 million)***. This area will contribute to improve the targeting system of the CT Program and initiate the recertification process of the current beneficiaries. Specifically, this subcomponent will support: (i) the development of an updated Proxy Means Test (PMT) formula,<sup>1</sup> questionnaire, and cut-off points to be used to determine categorization; (ii) the technical assistance to develop operational processes and procedures for the implementation of the targeting system, including the mechanisms for field data collection, data input and poverty categorization, monitoring (core indicators, spot checks, etc.),

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<sup>1</sup> The term "Proxy Means Test" is used to describe a situation where information on household or individual characteristics correlated with welfare levels is used in a formal algorithm to proxy household income, welfare, or need.

case management mechanism for submitting appeals and complaints as well as for information update, and data sharing protocols; (iii) financing the recertification process (re-targeting) of 15 percent of the current beneficiary households, prioritizing the areas where Component 2 will be implemented, and using a community-based targeting and PMT approach; and (iv) the development and implementation of the technological infrastructure to support the targeting processes. This last area of intervention includes: (i) developing the software to use Computer Assisted Personal Interviewing (CAPI), which should replace the traditional paper-and-pen methods by using tablets during data collection; (ii) tablets connectivity (once information is gathered at remote geographic locations, it will be transmitted to a central location through a wireless network); (iii) implementation of a data center that will serve as a data storing repository; and (iv) implementation of a targeting MIS module that will enable data validation and processing, as well as the automated application of the new PMT formula and categorization of households. The operationalization of the process will be the responsibility of the Zakat Chamber and the MoWSS through the PRCC, which will play a monitoring and supervision role. Following the initial support provided through the Project to recertify the 15 percent of beneficiaries, it is anticipated that the remaining 85 percent will be financed by the GoS as part of the second phase of recertification. The GoS does not currently record whether households are male or female headed and does not have a gender criterion for household selection. A gender mainstreaming strategy will be implemented in order to incorporate gender information during the recertification processes.

***Component 2: Piloting a PSN Approach (US\$1.96, of which US\$0.5 million Bank financed and US\$1.46 million GoS contribution)***

14. **As part of the longer-term reform agenda of the SSN system in Sudan, this component will finance a pilot cash for work program in combination with livelihood services.** This is modeled after the PSN projects established in the region, particularly Ethiopia's PSN program. The PSN Pilot in Sudan will constitute an important aspect of the SSN framework by supporting resilience building at the community level and providing access to livelihood-enhancing opportunities for beneficiaries. The pilot will provide the poorest households of selected communities with temporary employment in public works during the lean season, skills training, and access to financial services by connecting them to existing financial service providers.

15. **The PSN Pilot will be implemented by the CSU in coordination with the MoWSS.** Beneficiaries will be chosen based on a combination of community pre-selection and the application of the PMT that will be developed under Component 1. The pilot will generate lessons for a gradual transformation of the current CT Program into a broader SSN system with a combination of unconditional cash transfers, conditional cash transfers, and livelihood support activities.

16. **The PSN Pilot will provide short-term income and employment opportunities for poor households.** It will create social and productive assets through the work of beneficiaries. Possible activities may include soil and water conservation, small-scale irrigation, and social and economic infrastructure. Subprojects will be determined locally using a community-based participatory planning process and the community development experience the CSU obtained during the implementation of the CDF Project. It is envisaged that the majority of activities will focus on the introduction and further enhancement of improved land use management practices to create an enabling environment for more productive livelihoods. In addition, the component will contribute to improved access to education and health services through the construction and/or upgrading of education and health facilities.

17. **The ultimate aim of a PSN approach is consumption smoothing through resource transfers and promoting livelihood options for households to gradually transition out of poverty.** This component will therefore engage with households in their productive activities with the aim to transform their current productive systems by diversifying income sources, improving productivity, and increasing productive assets. The PSN Pilot will bring the rural extension and financial services together to help households strengthen their existing productive activities or start new income-generating activities. Eligible households will be supported with demand-driven technical assistance to enhance their ability to identify viable on- and off-farm income generating activities to improve access to financial services, to strengthen input sourcing and production, and to increase access to markets and, where possible, employment opportunities. Central to the engagement model with the households is the step-by-step development of a household-level business plan starting with basic skills and financial literacy training and leading up to investments in the chosen income-generating activity.

18. **The PSN Pilot will provide adequate financing to introduce the different building blocks of the PSN approach.** This includes funding for: (i) participatory community-level planning; (ii) cash for work subprojects; (iii) livelihood training activities; (iv) M&E; and (v) technical assistance, communications, and institutional capacity-building activities. The pilot will be implemented in North Kordofan as agreed between the MoWSS and the CSU. Subject to availability of funds and following a six-month review of the North Kordofan pilot, the PSN may be scaled up to other states: South Kordofan, West Kordofan, Blue Nile, Kassala, and Red Sea.

19. **The selection of North Kordofan to conduct the pilot is because of the comparatively strong capacity of stakeholders at the state and local level, and particularly due to the strong comparative capacity of the CSU in the state, underpinned by supportive State Government commitment.** The CSU State Office in North Kordofan has currently a well-trained and experienced team, headed by the State Coordinator, supported by a Civil Engineer, a Finance Officer, a Procurement Officer, a Secretary, and 40 trained Community Facilitators (all of which are university graduates). The CSU has experience of implementing labor-intensive public works in the State and is capable to immediately begin operations. The State Government has committed to supporting the Project financially. A preliminary communications assessment study was successfully completed in the state and an introductory PSN assessment workshop showed a high level of preparedness of state actors. Furthermore, North Kordofan is one of the states with a high poverty level, as evidenced by the 2014 Poverty Map, standing at 57 percent of the population out of 8.9 million inhabitants in the state (or 5.1 million poor people),<sup>2</sup> and has the highest income inequality in the country (as measured with Gini coefficients).<sup>3</sup>

20. **Technical assistance by the Bank is being provided during the course of Project preparation and implementation drawing on best global practices.** Lessons learned from the PSN Pilot (through a qualitative evaluation) could allow for rapid scaling up of the program and the design of exit and graduation strategies over time. The PSN Pilot project follows the CGAP-Ford Graduation Model with the aim of smoothening household consumption and contribute to poverty reduction. The core concept of the CGAP-Ford Graduation Model is combining social safety net transfers, livelihood activities, and access to microfinance services in a sequential way to create pathways for the poorest out of extreme poverty. The graduation model is based on the proven

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<sup>2</sup> North Kordofan is the third biggest state of Sudan in terms of population.

<sup>3</sup> For additional information refer to the World Bank's poverty assessment in Sudan (Annex 4).

success of BRAC's Targeting the Ultra-Poor (TUP) Program currently being applied in rural Bangladesh. Financing for an evaluation of the pilot is included in the component design.

## **Environmental Footprint**

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21. No significant adverse environmental impacts are anticipated under the Social Safety Net Project. The support offered through Component 2 through the CSU may result in small-scale infrastructure improvements and rehabilitation and are not expected to have major adverse environmental impacts, as they will be limited in scope. The project will not fund any new major construction, and no subproject involving involuntary acquisition of land or other assets or resettlement will be financed. The Project is expected to have substantial beneficial impacts on the environment as it will improve basic social and economic infrastructure for the communities, improving food security through establishing small water harvesting and watershed management projects, and improving the access to and quality of water through labor-intensive digging of water ponds (HAFIRS).

## **Policy, Legal and Administrative Framework**

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22. Sudan is a federal country divided into 18 states with three levels of authority: the national, state and locality level. The powers are divided among the various levels as follows:

- At the national level, the federal organs exercise powers of planning, legislation and execution on federal lands, natural resources, mineral and subterranean wealth, inter-state waters, national electricity projects, epidemics and natural disasters.
- Organs within the boundaries of the state exercise power on lands, natural resources, animal wealth, wildlife, non-nilotic waters and electric power.
- There are concurrent powers where both federal (national) and state organs exercise power on education, health, environment, tourism, industry and meteorology. The localities exercise powers within the locality boundaries through local orders to be approved by the locality legislative organ (until now there is no single locality legislative council in the whole country, although this is a provision stated in the constitution).
- The Interim Constitution provides for the creation of commissions, particularly on land to assume among other things planning and allocation of lands and forests between federal and state authorities.

23. Sudan was one of the first African countries to pass sectoral laws for the protection of the environment. However, these laws were further supported by an umbrella law enacted in 2001, the "Environmental Conservation Act" of 2001. This Act provides general principles and guidelines to be considered in implementing any development project. The Law (Act) makes it the responsibility of the project proponents, before embarking on any development activity, to carry out an EIA to identify the positive and negative impacts of the project, together with recommendations to mitigate negative impacts. The Act provides definitions and clarifications regarding natural resources management, pollutants and sources of pollution, endorses the Polluter Pays Principle and specifies issues to be considered in EIAs (Article 18):

- Description of the existing environment before the project;
- Description of the project activities;
- Assessment of potential environmental impacts, both positive and negative; and
- Provision of recommendations to mitigate the negative environmental effects.

24. To implement the provisions of the Act, a Higher Council for Environment and Natural Resources (HCENR) was established in 1991; a Ministry for Environment and Physical Development (MEPD) was established in 1995.

### **Relevant World Bank Policies**

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25. The project triggers OP 4.01 Environmental Assessment. The CSU activities under Component 2 may have potential negative environmental impacts related to construction for improving and/or rehabilitating community social and economic infrastructure. Under this component, the project will finance labor costs associated with community activities that might include the rehabilitation of schools, health and cultural facilities, community potable water supply, small wastewater disposal schemes, as well as irrigation and drainage schemes.

### **Potential Environmental Impacts**

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26. Given the small scale of community subprojects, predicted negative environmental impacts are unlikely to be significant, irreversible or large in scale. Potential negative impacts will be mainly related to construction activities including disruption of traffic pattern, interference with other infrastructures, disrupted access to residential and/or other buildings, change in the landscape (loss of vegetation), noise nuisance, air pollution due to dust formation, safety hazard from construction activities and inappropriate disposal of excavated materials and construction debris.

### **Environmental Screening, Assessment, and Management**

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27. Appropriate mitigation measures and their management are to be addressed through the use of the Environmental Management Plan (EMP) Check List attached as Part II of this document, which will be included in the Project's Operational Manual as well as mandated in contracts financed through the Project.

### **Monitoring and Reporting**

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28. The Project will maintain EMP Check Lists prepared for individual activities financed under Component 2 and use those Check Lists to supervise the activities and take any corrective action identified. The Project will report regularly to the Bank on the delivery of the activities and overall compliance with the EMP Check Lists.

**Part II: EMP Checklist for Activities**

<b>PART A: INSTITUTIONAL &amp; ADMINISTRATIVE</b>				
Country				
Project title				
Scope of project and activity				
Institutional arrangements (Name and contacts)	WB (Project Team Leader)	Project Management	Local Counterpart and/or Recipient	
Implementation arrangements (Name and contacts)	Safeguard Supervision	Local Counterpart Supervision	Local Inspectorate Supervision	Contactor
<b>SITE DESCRIPTION</b>				
Name of site				
Describe site location	Attachment 1: Site Map [ ]Y [ ] N			
Who owns the land?				
Geographic description				
<b>LEGISLATION</b>				
Identify national & local legislation & permits that apply to project activity				
<b>PUBLIC CONSULTATION</b>				
Identify when/where the public consultation process took place				
<b>INSTITUTIONAL CAPACITY BUILDING</b>				
Will there be any capacity building?	[ ] N or [ ]Y if Yes, Attachment 2 includes the capacity building program			

<b>PART B: ENVIRONMENTAL /SOCIAL SCREENING</b>			
<b>Will the site activity include/involve any of the following potential issues and/or impacts:</b>	<b>Activity and potential issues and/or impacts</b>	<b>Status</b>	<b>Additional references</b>
	1. Building rehabilitation <ul style="list-style-type: none"> <li>• Site specific vehicular traffic</li> <li>• Increase in dust and noise from demolition and/or construction</li> <li>• Construction waste</li> </ul>	[ ] Yes [ ] No	See Section <b>B</b> below
	2. New construction <ul style="list-style-type: none"> <li>• Excavation impacts and soil erosion</li> <li>• Increase sediment loads in receiving waters</li> <li>• Site specific vehicular traffic</li> <li>• Increase in dust and noise from demolition and/or construction</li> <li>• Construction waste</li> </ul>	[ ] Yes [ ] No	See Section <b>B</b> below
	3. Individual wastewater treatment system <ul style="list-style-type: none"> <li>• Effluent and / or discharges into receiving waters</li> </ul>	[ ] Yes [ ] No	See Section <b>C</b> below
	4. Historic building(s) and districts <ul style="list-style-type: none"> <li>• Risk of damage to known/unknown historical or archaeological sites</li> </ul>	[ ] Yes [ ] No	See Section <b>D</b> below
	5. Acquisition of land <sup>4</sup> <ul style="list-style-type: none"> <li>• Encroachment on private property</li> <li>• Relocation of project affected persons</li> <li>• Involuntary resettlement</li> <li>• Impacts on livelihood incomes</li> </ul>	[ ] Yes [ ] No	See Section <b>E</b> below
	6. Hazardous or toxic materials <sup>5</sup> <ul style="list-style-type: none"> <li>• Removal and disposal of toxic and/or hazardous demolition and / or construction waste</li> <li>• Storage of machine oils and lubricants</li> </ul>	[ ] Yes [ ] No	See Section <b>F</b> below
	7. Impacts on forests and/or protected areas <ul style="list-style-type: none"> <li>• Encroachment on designated forests, buffer and /or protected areas</li> <li>• Disturbance of locally protected animal habitat</li> </ul>	[ ] Yes [ ] No	See Section <b>G</b> below
	8. Handling / management of medical waste <ul style="list-style-type: none"> <li>• Clinical waste, sharps, pharmaceutical products (cytotoxic and hazardous chemical waste), radioactive waste, organic domestic waste, non-organic domestic waste</li> <li>• On site or off-site disposal of medical waste</li> </ul>	[ ] Yes [ ] No	See Section <b>H</b> below
	9. Traffic and Pedestrian Safety <ul style="list-style-type: none"> <li>• Site specific vehicular traffic</li> <li>• Site is in a populated area</li> </ul>	[ ] Yes [ ] No	See Section <b>I</b> below

<sup>4</sup> Land acquisitions includes displacement of people, change of livelihood encroachment on private property this is to land that is purchased/transferred and affects people who are living and/or squatters and/or operate a business (kiosks) on land that is being acquired.

<sup>5</sup> Toxic / hazardous material includes and is not limited to asbestos, toxic paints, removal of lead paint, etc.

<b>ACTIVITY</b>	<b>PARAMETER</b>	<b>GOOD PRACTICES MITIGATION MEASURES CHECKLIST</b>
<b>A. General Conditions</b>	Notification and Worker Safety	<ul style="list-style-type: none"> <li>(a) The local construction and environment inspectorates and communities have been notified of upcoming activities</li> <li>(b) The public has been notified of the works through appropriate notification in the media and/or at publicly accessible sites (including the site of the works)</li> <li>(c) All legally required permits (to include not limited to land use, resource use, dumping, sanitary inspection permit) have been acquired for construction and/or rehabilitation</li> <li>(d) All work will be carried out in a safe and disciplined manner designed to minimize impacts on neighboring residents and environment.</li> <li>(e) Workers' PPE will comply with international good practice (always hardhats, as needed masks and safety glasses, harnesses and safety boots)</li> <li>(f) Appropriate signposting of the sites will inform workers of key rules and regulations to follow.</li> </ul>
<b>B. General Rehabilitation and /or Construction Activities</b>	Air Quality	<ul style="list-style-type: none"> <li>(a) During interior demolition use debris-chutes above the first floor</li> <li>(b) Keep demolition debris in controlled area and spray with water mist to reduce debris dust</li> <li>(c) Suppress dust during pneumatic drilling/wall destruction by ongoing water spraying and/or installing dust screen enclosures at site</li> <li>(d) Keep surrounding environment (sidewalks, roads) free of debris to minimize dust</li> <li>(e) There will be no open burning of construction / waste material at the site</li> <li>(f) There will be no excessive idling of construction vehicles at sites</li> </ul>
	Noise	<ul style="list-style-type: none"> <li>(a) Construction noise will be limited to restricted times agreed to in the permit</li> <li>(b) During operations the engine covers of generators, air compressors and other powered mechanical equipment should be closed, and equipment placed as far away from residential areas as possible</li> </ul>
	Water Quality	<ul style="list-style-type: none"> <li>(a) The site will 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.</li> </ul>
	Waste management	<ul style="list-style-type: none"> <li>(a) Waste collection and disposal pathways and sites will be identified for all major waste types expected from demolition and construction activities.</li> <li>(b) Mineral construction and demolition wastes will be separated from general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers.</li> <li>(c) Construction waste will be collected and disposed properly by licensed collectors</li> <li>(d) The records of waste disposal will be maintained as proof for proper management as designed.</li> <li>(e) Whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos)</li> </ul>
<b>C. Individual wastewater treatment system</b>	Water Quality	<ul style="list-style-type: none"> <li>(a) The approach to handling sanitary wastes and wastewater from building sites (installation or reconstruction) must be approved by the local authorities</li> <li>(b) Before being discharged into receiving waters, effluents from individual wastewater systems must be treated in order to meet the minimal quality criteria set out by national guidelines on effluent quality and wastewater treatment</li> <li>(c) Monitoring of new wastewater systems (before/after) will be carried out</li> </ul>
<b>D. Historic building(s)</b>	Cultural Heritage	<ul style="list-style-type: none"> <li>(a) If the building is a designated historic structure, very close to such a structure, or located in a designated historic district, notify and obtain approval/permits from local authorities and address all construction activities in line with local and national legislation</li> <li>(b) Ensure that provisions are put in place so that artifacts or other possible "chance finds" encountered in excavation or construction are noted, officials contacted, and works activities delayed or modified to account for such finds.</li> </ul>
<b>E. Acquisition of land</b>	Land Acquisition Plan/Framework	<ul style="list-style-type: none"> <li>(a) If expropriation of land was not expected and is required, or if loss of access to income of legal or illegal users of land was not expected but may occur, that the bank task Team Leader is consulted.</li> <li>(b) The approved Land Acquisition Plan/Framework (if required by the project) will be implemented</li> </ul>

ACTIVITY	PARAMETER	GOOD PRACTICES MITIGATION MEASURES CHECKLIST
F. Toxic Materials	Asbestos management	(a) If asbestos is located on the project site, mark clearly as hazardous material (b) When possible the asbestos will be appropriately contained and sealed to minimize exposure (c) The asbestos prior to removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust (d) Asbestos will be handled and disposed by skilled & experienced professionals (e) If asbestos material is be stored temporarily, the wastes should be securely enclosed inside closed containments and marked appropriately (f) The removed asbestos will not be reused
	Toxic / hazardous waste management	(a) Temporarily storage on site of all hazardous or toxic substances will be in safe containers labeled with details of composition, properties and handling information (b) The containers of hazardous substances should be placed in an leak-proof container to prevent spillage and leaching (c) The wastes are transported by specially licensed carriers and disposed in a licensed facility. (d) Paints with toxic ingredients or solvents or lead-based paints will not be used
G. Affects forests and/or protected areas	Protection	(a) All recognized natural habitats and protected areas in the immediate vicinity of the activity will not be damaged or exploited, all staff will be strictly prohibited from hunting, foraging, logging or other damaging activities. (b) For large trees in the vicinity of the activity, mark and cordon off with a fence large trees and protect root system and avoid any damage to the trees (c) Adjacent wetlands and streams will be protected, from construction site run-off, with appropriate erosion and sediment control feature to include by not limited to hay bales, silt fences (d) There will be no unlicensed borrow pits, quarries or waste dumps in adjacent areas, especially not in protected areas.
H. Disposal of medical waste	Infrastructure for medical waste management	(a) In compliance with national regulations the contractor will insure that newly constructed and/or rehabilitated health care facilities include sufficient infrastructure for medical waste handling and disposal; this includes and not limited to: <ul style="list-style-type: none"> <li>▪ Special facilities for segregated healthcare waste (including soiled instruments “sharps”, and human tissue or fluids) from other waste disposal:               <ul style="list-style-type: none"> <li>a. Clinical waste: yellow bags and containers</li> <li>b. Sharps – Special puncture resistant containers/boxes</li> <li>c. Domestic waste (non-organic): black bags and containers</li> </ul> </li> <li>▪ Appropriate storage facilities for medical waste are in place; and</li> <li>▪ If the activity includes facility-based treatment, appropriate disposal options are in place and operational</li> </ul>
I Traffic and Pedestrian Safety	Direct or indirect hazards to public traffic and pedestrians by construction activities	(b) In compliance with national regulations the contractor will insure that the construction site is properly secured and construction related traffic regulated. This includes but is not limited to <ul style="list-style-type: none"> <li>▪ Signposting, warning signs, barriers and traffic diversions: site will be clearly visible and the public warned of all potential hazards</li> <li>▪ 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.</li> <li>▪ Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement</li> <li>▪ Active traffic management by trained and visible staff at the site, if required for safe and convenient passage for the public.</li> <li>▪ Ensuring safe and continuous access to office facilities, shops and residences during renovation activities, if the buildings stay open for the public.</li> </ul>

<b>PART 8: MONITORING PLAN</b>							
<b>Phase</b>	<b>What</b> (Is the parameter to be monitored?)	<b>Where</b> (Is the parameter to be monitored?)	<b>How</b> (Is the parameter to be monitored?)	<b>When</b> (Define the frequency / or continuous?)	<b>Why</b> (Is the parameter being monitored?)	<b>Cost</b> (If not included in project budget.)	<b>Who</b> (Is responsible for monitoring?)
During activity <b>preparation</b>							
During activity <b>implementation</b>							
During activity <b>supervision</b>							