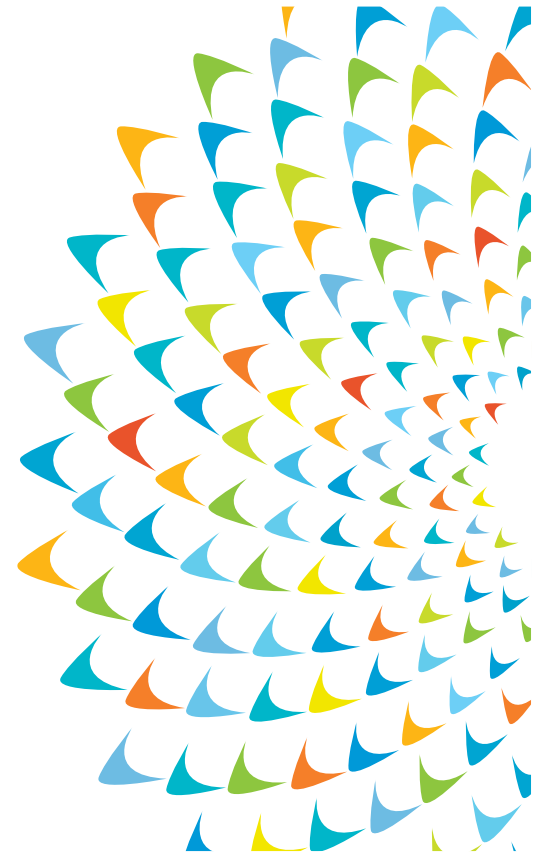


Environment and Social Management

Responsibilities,
Compliance
Management and
Reporting





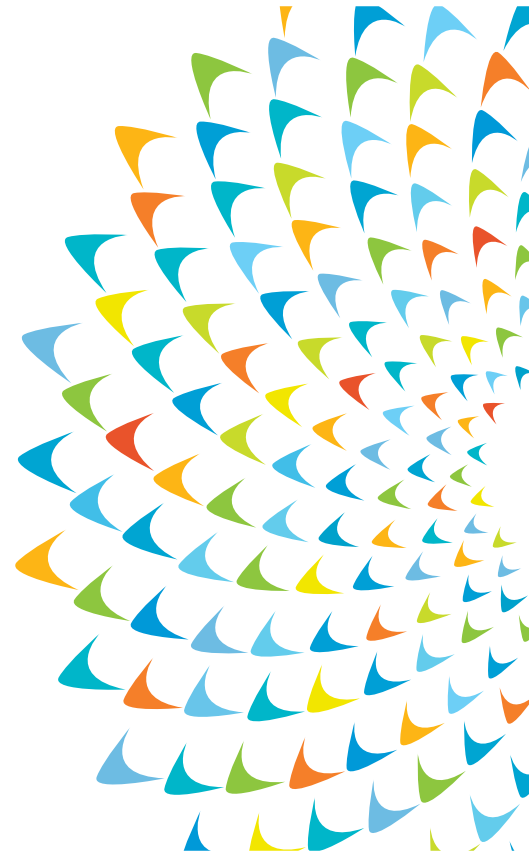
Abbreviations

ADB	-	Asian Development Bank
CAR	-	Corrective action request
CEMP	-	Construction environmental management plan
CESMP	-	Construction/contractors environmental & social management plan
CSS	-	Country safeguard system
DP	-	Development partner
EIA/ESIA	-	Environmental impact assessment / environmental & social impact assessment
EMP/ESMP	-	Environmental management plan / environmental & social management plan
EM/EO	-	Environmental manager /officer (contractor)
EP	-	Environment permit
GRM	-	Grievance redress mechanism
IEE	-	Initial environmental examination
PC	-	Project cycle
PMU	-	Project management unit
QPR	-	Quarterly progress report
SC	-	Supervision consultant
SPS	-	Safeguard Policy Statement 2009 (of ADB)



Objectives of this module

1. Roles and responsibilities in developing & implementing ESMP/CESMP
2. Monitoring and auditing compliance with ESMP/CESMP including tools and approaches
3. Reporting requirements for ESMP/CESMP





Part 1: Roles and Responsibilities in implementing ESMP/CESMP





The Responsible Parties

1. PMU Staff & Consultants

- Project job managers
- Environmental specialists (PMU staff/ consultants)
- Site supervisors (PMU staff/consultants)

Key role in respect of environmental safeguards is to ensure that environmental safeguards for the project are implemented effectively during construction





The Responsible Parties



2. Contractor

- Management and workers
- Environmental manager/officer and H&S manager/officer

Key role in respect of environmental safeguards is to prepare CESMP (as per ESMP), implement CESMP effectively and comply with license/permit conditions.



The Responsible Parties



3. **CSS Regulator** – Environmental Authority

- Monitoring & enforcement officer(s)

Key role – ensure compliance with CSS and all conditions of statutory approvals.

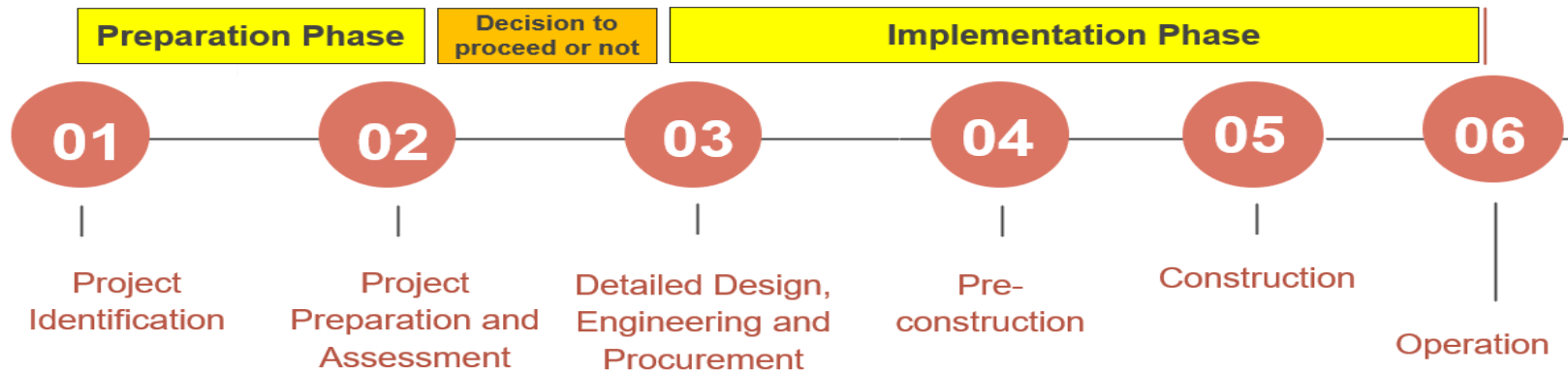
4. **Development Partner** (funding agency)

- Project Manager/Officer
- Safeguards specialists

Key role - ensure agency's safeguard policies are complied with in accordance with loan agreement including all approved safeguard documentation.



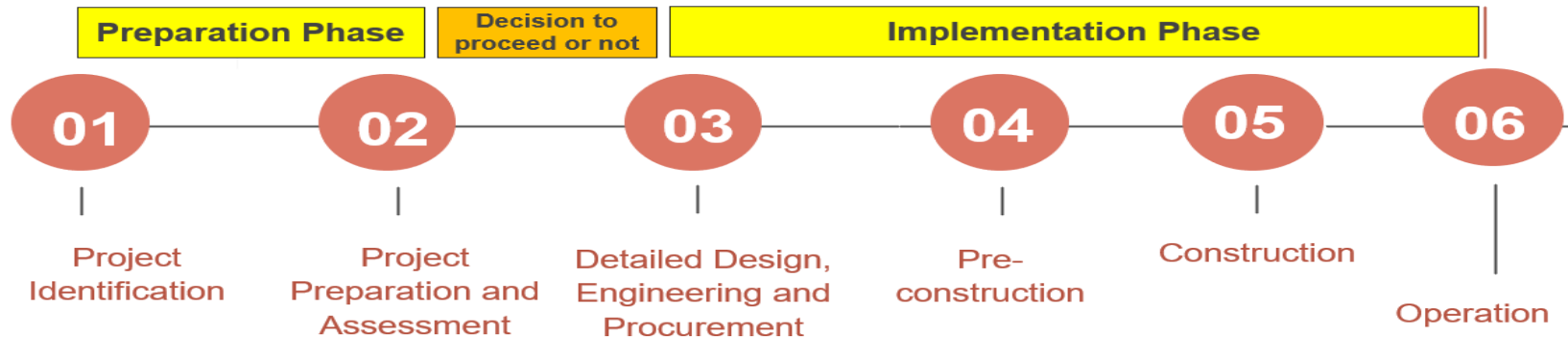
PMU Env Safeguards Main Responsibilities



- Planning – Ensuring that everything is in place before construction starts (PC 02, 03, 04)
- Monitoring – Checking if the project is proceeding as planned, also recording and correcting problems. (PC 05)
- Reporting - Letting all stakeholders know how the project is progressing. (PC 02, 03, 04, 05)



Project Preparation, Detailed Design PMU ES Responsibilities (PC 02 & 03)

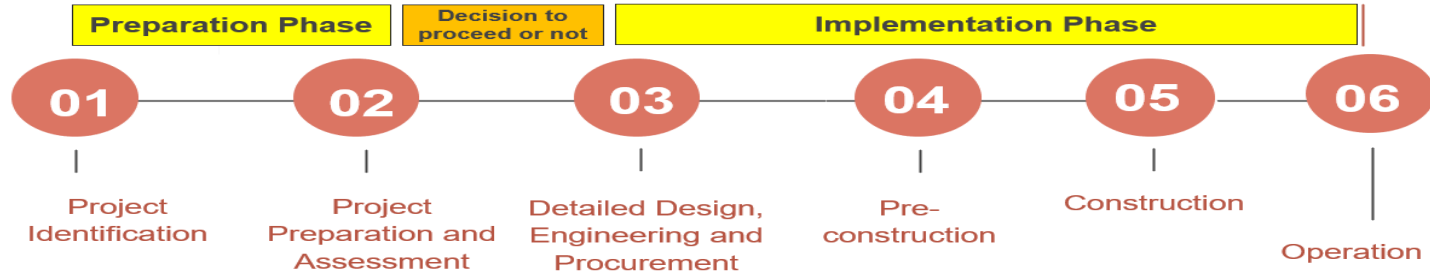


Environmental Management Planning

- Prepare & update assessment (including ESMP)
- Ensure permits and licenses obtained - coordination with regulator and CSS
- Communication with all stakeholders – CCP, GRM
- Prepare env sections of tender documents – include ESMP, environmental design requirements, permit conditions, requirements for CESMP, enforcement clauses for noncompliance



Pre-construction (PC 04)



Environmental Management Planning

PMU ES reviews, supports and approves CESMP

PMU ES prepares supervision procedures/checklists

PMU ES verifies compliance of contractor with CESMP at site meeting.

PMU ES informs PM that contractor is now cleared to start work.

Project Implementation Activities

Contractor prepares CESMP

Contractor is inducted to site by ES

Contractor is approved to start works

Conditions Required to Complete Actions

Contractor has appointed environmental manager/officer.

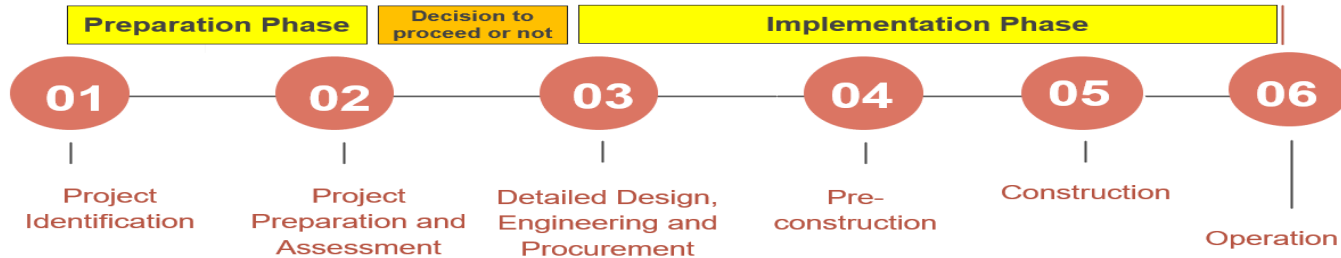
After award of contract, contractor **usually** has 30 days to prepare CESMP/ESMS.

Contractor cannot take possession of construction site until (i) CESMP has been approved, and (ii) induction is completed satisfactorily.





Construction (PC 05)



Environmental Management Actions

Monitoring commences

PMU ES monitors & audits contractor's compliance with approved CESMP.

ES evaluates monitoring program.

ES/Site supervisor completes weekly checklist & issues corrective action requests (CAR) as required

Construction completed
Operation commences

Project Implementation

Contractor begins work.

Contractor implements CESMP

Contractor's EM/EO:

- i) monitors CESMP impln
- ii) advises and supports Contractor in taking corrective actions
- iii) reports on CESMP implementation

Construction is completed, and the project commissioned

Conditions Required to Complete Actions

Contractor has complied with CESMP requirements for implementing and monitoring work on-site.

PMU ES reviewed and signed off on completed work including corrective actions

Project works completed in accordance with the CESMP. All sites rehabilitated.

Payments may be withheld if sites have not been cleared and closed according to CESMP specifications.





Management System

- PMU ES needs to establish an organized system for environmental management - communications, inspections, monitoring, reporting
- The ES must keep evidence of all stages of the process
- Development partner will audit projects according to those stages

Note: the importance of PLANNING





Part 2: Monitoring and auditing compliance with ESMP/CESMP





Why Monitor?



- To verify the effectiveness of environmental management measures.
- To comply with statutory requirements (permit conditions, applicable standards)
- For continuous improvement:
 - environmental awareness,
 - deterrents.
- To collect evidence.





Effective Monitoring Plan

What, when, where, how, and who?

- Based on risk assessment – is proportional, relevant, effective
- Ranges from visual observation to physical measurements
- Is part of ESMP and therefore traceable back to the project's EIA
- Keep it simple
- Baseline status
- Checklists with weather, yes/no & a photograph
- Documented, reviewed, and reported



Common Monitoring

- Dust and air quality
- Noise and vibration
- Water quality
- Soil erosion, excavations
- Waste (sites and camps)
- Health and workforce safety
- Biodiversity (habitat, fauna, routes)
- Grievance redress mechanism





Keep it simple...

For smaller/low risk projects use a checklist e.g.

Dust mitigation			
Are truck loads covered?	Yes	No	
Is there a water spraying schedule?	Yes	No	
Are water trucks operating?	Yes	No	
Health and Safety			
Do workers have PPE (boots, vests, goggles)	Yes	No	
Are workers wearing PPE?	Yes	No	
Is there warning signage at major works?	Yes	No	
Are excavations fenced off?	Yes	No	

Site visits, informal checks, formal audits and inspections are at the heart of the monitoring process



Inspection & Audit (I&A)



Provides a mechanism for key parties to:

- Regularly monitor/verify project's environmental performance and CESMP compliance
- Identify potential problems before they occur (pro-active approach)
- Initiate corrective action

Provides evidence of compliance with CSS – permits and partner policies – loan agreement

Whose Responsibility?

- (i) Contractor, (ii) PMU, (iii) regulator,
- (iv) development partner - each has responsibilities



I&A: Contractor's responsibilities

Environmental Manager / Officer

Check CESMP mitigation measures implemented effectively, using checklist

Establish a routine system

Note non-conformance, potential issue
– take action

Keep records: maintain site diary and checklist

Ensure any physical monitoring is undertaken properly

Link monitoring data to site observations



I&A: Contractor's responsibilities (contd)

Be **proactive** rather than reactive - identify and address a potential problem before it becomes an actual problem by:

- Review works schedules & construction method statements
- Participate in progress meetings
- Help identify practical solutions to actual and potential problems
- Communicate with local community regarding works progress
- Use trends in monitoring data to predict/identify possible future problems





I&A: PMU responsibilities

Environment Specialist of PMU/SC

Monitor and supervise implementation of CESMP

- Regular joint site inspections with contractor's EM/ESO to verify compliance
 - information review
 - visual inspection
 - record observations – submit inspection checklist to contractor





I&A: PMU responsibilities (contd)

Alongside routine inspections three key issues to be followed up and documented:

- Complaints made through the GRM
- Resolution of CESMP non-conformances
- Regular community consultations and info disclosure as per CCP



I&A: Regulator responsibilities

- Ensures compliance with consent/permit conditions - monitors construction as per Regulator's schedule
- PMU to advise Regulator of routine site inspection schedule – coordinate joint inspection as required
- Reviews PMU inspection reports as required
- Participates in community consultations





I&A: Development partner responsibilities

Periodic reviews and site visits during project implementation:

- Tender documents and tender preparation process
- If required, audit of bid evaluation process and evaluation report
- PMU, SC and contractor have designated environment staff
- Site conditions and compliance with project ESMP
- Review contractor's CESMP
- Spot-checks, audits
- Review of monitoring reports incl. other third-party auditors



Inspection Monitoring and Audit Tools

- Use standard forms
- Include a rating for each area
- Include monthly summaries of noncompliance /incident notices and resolution status
- Submit audit reports to contractor

See examples





Multimedia Monitors

The most useful monitoring instrument
of all:





Summary

A monitoring program should be based on the risk assessments.

Monitoring ranges from simple visual inspection to complex analysis, depending on the risks.

Use recognized best-practice monitoring and analytical methods.

Monitoring linked with inspection and audit.

Carry a camera when at the site.



Part 3: Reporting Requirements for ESMP/CESMP





Typical requirements



- Contractors monthly progress reports to report on CESMP implementation, GRM etc. - includes daily/weekly checklists by EM/EO
- PMU quarterly progress reports (incl. section on safeguards)
- Development partner - requires quarterly and/or six monthly environmental monitoring report
- DP, PMU, contractor, and the design and supervision consultants may agree other requirements.
- Audit inspection reports – as outlined above



Reporting tips

Focus on	Focus on monitoring and inspection and results (no pasting loads of text from other reports)
Use	Use tables and photos – can be updated each report
Include	Include completed checklists





Incident/Noncompliance Notice

- Summary
- Statistics
- Description of incident
- Level of significance/impact
- Control action (at the time)
- Evaluation of consequences
- Lessons learned & corrective action

Non-Compliance Report Form

Facility Name: _____ Date: _____
Facility Address: _____
Person Reporting: _____ Title: _____
Phone Number: _____ Parish: _____
LPDES Number: LA _____ AI#: _____
Receiving Water: _____
(Refer to Subject Line on Permit Cover Letter)

Date of Non-Compliance	Parameter/Description (e.g. TSS, Overflow)	Outfall No./Location (e.g. 001, 123 Main St.)	Permit Limit	Reported Value

Cause of Violation(s): _____

Corrective Action/Preventative Measures/Remediation: _____





Semi-annual Report

Three main sections plus annexes:

- Introduction – construction activities and progress in past 6 months; any changes in EM team
- Environmental monitoring – summarize data, explain exceedances, recommendations for preventing future exceedances
- Environmental management – delivery of CESMP actions/items, inspections and audits, non-compliance notices and corrective actions, consultations and complaints, training/capacity building activities





Final Audit Report



- Required for final payment, penalties.
- Focus on environmental condition indicators and site clean-up/rehab
- Open issues will be negotiated, and final report updated.
- Final report approval is required.



Summary

- Use standard formats, templates, checklists whenever possible.
- Reports should be clear and concise.
- Use of photos, graphs and tables rather than pages of text
- Reports should be oriented towards the intended readers i.e. the public.



Thank you

Questions?

