ESMP and ESCOP for Infrastructure and Small Works

LLF ESMS Annex G

CONTENTS

ACRONYMS AND ABBREVIATIONS

Name	Description
E&S	Environmental and Social
EHS	Environmental, Health and Safety
ESCOP	Environmental and Social Code of Practices
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
H&S	Health and Safety
LL	Legacy Landscapes
LLF	Legacy Landscapes Fund
PPE	Personal Protective Equipment
UXO	Unexploded ordnance
WB ESS	World Bank Environmental and Social Standards

DOCUMENT HISTORY

Version	Revision	Prepared by	Reviewed by	Approved by	Date	Comments

1. INTRODUCTION

Construction activities can have potential negative environmental and social (E&S) impacts, which depend on the program type and scale, sensitivity of the site, nature, significance, magnitude and duration of its potential E&S impacts, complexity of issues raised and reliability of mitigation. The potential E&S impacts have to be managed and mitigated through an environmental and social management plan (ESMP) or an environmental and social code of practices (ESCOP), which constitutes a simplified ESMP. The grantee is required to develop the ESMP or the ESCOP for infrastructure and small works with moderate and lower environmental and social risks and impacts, respectively.

Note: This document provides a guidance and templates that are aligned with the applicable standards listed in LLF ESMS manual. In all cases, the grantee and/or the party developing the plans and/or procedures must comply with the local/national requirements; then, the guidance provided in this document (including the other recommended publications) should be utilised to determine how to align the LL program with the applicable standards. If the LL program (or the grantee organisation) already have similar plans and/or templates developed and/or currently implemented, the grantee should conduct the gap analysis exercise between the existing template and/or document and this LLF guidance. The identified gaps should be closed following the rule – stricter applies.

The requirement to develop the ESMP and/or ESCOP might be stated in the environmental and social action plan (ESAP) that is part of the grant agreement between the grantee and LLF. Alternatively, such requirement will be triggered by legacy landscape (LL) program activity during the lifecycle of the LL program.

Triggers	Respective ESMS Tools	Supporting ESMS Tools*	Comments
• No specific trigger necessary • **Required for all programs**	• Annex P – Stakeholder Engagement Plan Outline • Annex Q – Program-level Grievance and Feedback Mechanism • Annex R – ESAP Implementation & ESHS Reporting • Annex S – Serious incident Reporting	• Annex M – Community Engagement and Planning Framework for Voluntary Access Restrictions • Annex N – Indigenous Peoples Plan • Annex O - FPIC Protocol	It is recommended that in the case of FPIC being triggered, the grantee will engage a specialized consultant to assist in handling elements of the SEP, inclusive of an IPP.

* The „Supporting ESMS Tools" are potentially applicable and/or could be used for support of the „Respective ESMS Tool" but are not triggered by the same trigger. For the annex specific trigger refer to the respective annex document. For example, the SEP always applies, but FPIC may be a supporting document, but it is not triggered under the conditions of the first column (i.e., „Triggers").

1.1 Purpose

This document serves as ESMP and ESCOP template, capturing the typical E&S impacts and associated mitigation measures that need to be considered for legacy landscape (LL) programs that include construction activities. The grantee - together with the contractor, if applicable - shall use this ESMP and ESCOP template and adapt it to the specifications of the construction activities, characteristics and risks.

The purpose of this guidance on the ESMP and/or the ESCOP is to assist the grantee in identifying and documenting program specific E&S risks and impacts and in defining applicable risk mitigation measures. This guidance provides templates and formats which can be used for the preparation of structured and clear ESMPs and/or ESCOPs. The grantee will typically, but not obligatory, engage construction contractor(s) or have the beneficiary communities to undertake the works. It is the responsibility of the grantee to undertake an overall E&S risk assessment for the planned

interventions and to prepare the ESMP and/or the ESCOP commensurate to the level and significance of these risks and impacts. The grantee should work in line with the provisions of this ESMP and ESCOP guidance and to include the ESMP and/or the ESCOP in the contract between the grantee and its construction contractor(s), and to ensure that the relevant ESMP and/or ESCOP requirements are implemented during program implementation. If necessary, the ESMP and/or ESCOP is to be adapted by the grantee or contractor to most accurately reflect site specific environmental and social risks as well as the contractor's methods to address these risks.

1.2 Objective

The objective of the ESMP and ESCOP is to ensure that the environmental requirement, social commitments, and health and safety risks associated with the program are carried forward into the construction and operational phases of the program and are effectively managed. The ESMP and ESCOP have to ensure that the program operates with national requirements of the LL program host country as well as the applicable standards (see chapter 2) and provide a reference against which future monitoring and evaluation can be undertaken.

2. APPLICABLE STANDARDS

The full list of applicable standards for developing the ESMP and/or ESCOP is indicated in the LLF ESMS manual document. In addition, the World Bank Group Environmental, Health, and Safety Guidelines[1] should be reflected. These guidelines should be used as a technical reference document with general and industry-specific examples of good international industry practice.

3. GENERAL PROVISION

In the context of the LL program, construction activities are likely to include infrastructure and small works like workshops, training centres, administrative buildings, shelter, storage, bridge, aviation tracks, roads, access roads, etc., and are assumed to have moderate or low E&S risks.

The ESMP and ESCOP should include chapters on the following topics:

- Description of construction activities,
- Roles and responsibilities,
- Training requirements,
- Monitoring and reporting.

The main part of the ESMP and/or ESCOP comprises the mitigation measures with the according means of verification (indicators), responsibilities and the means of monitoring.

Furthermore, during the construction activities, the grantee has to avoid significant adverse impacts to cultural heritage. The E&S risks and impacts identification process (e.g., ESIA study) should determine whether the proposed location is in areas where cultural heritage is expected to be found, either during construction or operations. Appendix D provides a guidance on the development and implementation of a chance finding procedure.

Not listed in this ESMP and ESCOP guidance are the measures that are valid for all programs as described in the LLF ESMS manual; these are:

- Stakeholder engagement plan (refer to the LLF ESMS documents, **Annex P – Stakeholder Engagement Plan Outline**)

[1] https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

- Grievance Mechanism (refer to the LLF ESMS documents, **Annex Q – Program-level Grievance Mechanism**).

Appendix C provides the "do and don't" guidance on general best practices to be used during infrastructure and small works. These recommendations have to be used regardless the content of the ESMP and ESCOP. Furthermore, it is important that the grantee and/or the contractor conducting the construction activities considers the program affected people traditionals ways to construct. Therefore, stakeholder engagement should be conducted prior and during the development and implementation of the ESMP and/or ESCOP.

The overall responsibility for the ESMP and/or ESCOP lies with the grantee. The contractor will be obliged to support the preparation and ensure the implementation of the ESMP and/or ESCOP and the respective reporting. The mitigation measures, responsibilities and monitoring requirements need to be further conveyed to any sub-contractors engaged by the contractor and/or any suppliers associated with his operations. It is the responsibility of the contractor that every worker and subcontractor on the ground needs to be aware of the content of the ESMP and/or ESCOP and the specific responsibilities under it.

Moderate and lower risk construction activities are those in which potential environmental and social impacts of interventions and activities are expected to be limited and site-specific, temporary, reversible and mitigatable with standard measures and good practices. It is expected that majority of the LL program´s construction activities will be low risk and thus require only ESCOP. Typical impacts would comprise for example construction waste, dust and noise generation, community safety and occupational health and safety issues.

Criteria to be used to define moderate and lower risk construction activity include, but are not limited to:

- no ESIA required neither by applicable national standards nor by LLF,
- no physical displacement,
- limited economical displacement (not more than 15 households),
- no program associated facilities[2],
- no electric power production and transmission construction activities (except individual / local power facility),
- no need of UXO clearance activities on the site,
- no manipulation of asbestos is required or no asbestos is presumed to be present.

Additional criteria to define lower risk construction activities (compared to moderate risk) include, but are not limited to:

- no use of heavy machinery (except vehicles for transportation of workers and material),
- no demolition works are required, no dismantling of a structure or part of a load-bearing structure is required[3],
- no earthmoving works are required (except for small trenches as specified below),
- no scaffolding required (work at height limited to the use of ladders),
- no trenches deeper than 120 cm, or in unstable, loose, soft or wet soil types[4],

[2] Facilities or activities that are directly and significantly related to the program; and carried out, contemporaneously with the program; and necessary for the program to be viable and would not have been constructed, expanded or conducted if the program did not exist (for example access roads, worker camps, transmission lines, quarries etc.)

[3] Demolition or dismantling of a load-bearing structure/element is considered "high-risk construction work"

[4] In general, trenches that are deeper than 120 cm require a protective system (sloping, shoring or temporary protective structure), unless excavation is made in stable rock.

- no work in confined spaces,
- no roofing works or rehabilitation of roof protection required,
- no prolonged use of vibratory power tools required,
- no lifting equipment for material handling, such as cranes, required;
- no work with hazardous substances in significant quantities[5],
- not more than fifty (50) workers mobilized[6] for individual intervention,
- no on-site material manufacturing, such as production of brick or concrete blocks, manufacturing of windows and doors, and production of gravel and stones, is required.

The above mentioned criteria provide practical guidance to define moderate or lower risk projects and do not cover all hazards or risks which may arise. Thus, these criteria are not exhaustive and the final definition shall consider additional construction activities specific circumstances. Especially in cases where monitoring capabilities of the Grantee, or contractors' qualifications, or labourer skills are expected to be low, increased risks' assessment should be taken in consideration.

4. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

The construction activities with moderate E&S risks are required to develop an ESMP. The ESMP Template (see 0) should not be used "as it is" for a construction activity but serves as a basis for a program-specific ESMP, commensurate with the relevant E&S risks and expected impacts of the construction activity.

The ESMP is typically divided into the following three phases:

- Preparation phase (conception, planning),
- Implementation/ construction phase, and
- Operation phase.

Each phase is further divided into construction activity relevant topics (e.g., occupational health & safety or waste management) in line with relevant standards requirements. Each topic should provide specific measures, along with means of verification, the provision of responsibilities and a short description of appropriate monitoring procedures.

5. ENVIRONMENTAL AND SOCIAL CODE OF PRACTICES (ESCOP)

An ESCOP applies to construction activities for which potential environmental and social impacts of interventions and activities are expected to be lower and site-specific, reversible and mitigatable with standard measures. It is expected that majority of the LL program´s construction activities will be low impacts and thus require only ESCOP. Typical impacts would comprise for example:

- Street sweeping and cleaning, cleaning of public spaces,
- Waste collection,
- Rehabilitation of classrooms and other public buildings (only ground floor buildings),
- Rehabilitation of small rural roads, including breaking of rocks (without large machinery),

[5] Significant quantities: more than what a private person can buy without special authorisation

[6] For 50 workers and above a dedicated environmental safety and hygiene officer is frequently required on construction sites by national legislations

- Cleaning and replacement of culverts, and drainage clearance along roads, rehabilitation of small irrigation channels,
- Small water sanitation and hygiene infrastructure (e.g., school sanitation, hand dug wells/small wells, improvement of springs),
- Rehabilitation of other small infrastructure,
- Rehabilitation, renovation or construction of buildings for which no specific impacts are expected, and
- Simple soil erosion prevention structures (soil bunds).

The ESCOP guidance provided in Appendix B is conceptualized as a template and a living document that needs to be reviewed and can be complemented by additional measures as appropriate in order to address site-specific conditions of a given construction activity, prior to its application.

The ESCOP is based on a set of general requirements:

- Unexploded Ordnance (UXO) / hazardous and dangerous materials clearance as relevant completed and approved prior to start of works;
- Works will be carried out with hand tools or hand held small machinery, no large machinery is used (except transport vehicles/lorries);
- Works will not include:
  - Working on electricity infrastructure,
  - Working in trenches deeper than 150 cm,
  - Working at heights (higher than ground floor) and scaffolding, and
  - Working in confined spaces.
- No land acquisition, economic and/or physical displacement will occur from construction activities; land requirements would only be related to temporary land needs for construction activities; land take will be based on mutual agreements with land owners on the willing buyer/willing seller principle (including compensation/rental arrangements and conditions for use and reinstatement);
- Compensation at replacement cost/full repair costs will be paid by the contractor for any damage resulting from construction activities (e.g. damage to land, structures, livestock, crops and trees) to the respective owner of the affected asset;
- The ESCOP is a living document that will be adapted and amended as appropriate to meet site specific conditions;
- The ESCOP will be part of tender documents and of contracts with contractors/implementing partners;
- The ESCOP implementation will be supervised during construction; and
- The ESCOP will be complemented by obligations from relevant local legislation as appropriate.

APPENDIX A ESMP TEMPLATE

The table below provides a template of the ESMP that can be used by the grantee and/or its contractor. In the table term "Project" refers to any infrastructure and/or small works like workshops, training centres, administrative buildings, shelter, storage, bridge, aviation tracks, roads, access roads, etc., and are assumed to have moderate E&S risks.

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
Preparation (Conception, Planning)	E&S Risk Management & Project Siting	■ Define Environmental & Social (E&S) requirements and assign responsibilities for the construction Project - Ensure that the contractor has experience in dealing with E&S management. - Give authority to the contractor to stop any works if non-conformities are identified ■ Build as far as practical and relevant from neighbours' residences and sensible receptors (schools, hospitals). ■ Plan the Project to avoid - Environmentally sensitive areas, such as protected areas and places near protected areas (buffer zones) - Areas prone to natural disasters or - Crossing of critical habitat - Known areas of historical/cultural/archaeological interest - Rivers and streams as well as flooded areas (consider seasonal variations) - Long downhill stretches and slopes above 10%. When possible, roads should follow hill contours - Land acquisition or impacts on livelihoods ■ Consider all associated facilities throughout the E&S risk management activities, such as: - All sources of materials, such as quarries for backfill material, sand, gravel etc. - All temporary facilities used for construction, such as material storage areas etc.	Project application / Project concept Contractor's resume and past ESHS experience in similar Projects	Grantee	■ Construction reports, ■ Review once prior to selection of site manager

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
	Project Siting	■ Identify risks linked to the previous use of the site, such as soil contaminations, and have the source of contamination removed before construction can start. ■ Minimise impacts on flora/fauna by a suitable selection of the exact Project site ■ Schedule activities to avoid breeding and nesting seasons for any identified critically endangered or endangered wildlife species.	Project application Site Observations	Grantee Contractor	■ Construction reports, ■ Site inspections
	Project Design	■ Identify and comply with all applicable laws, permitting requirements and regulations against national legislation, WB ESS 1-10 and World Bank Group General Environmental, Health and Safety (EHS) and Sector Specific. ■ When build inside or near an indigenous people or local communities village, respect the traditional aesthetics, land use, and culture. ■ Apply low-maintenance solutions in the design of buildings, e.g. based on other buildings of the same type in the region. ■ Account for proper ventilation in buildings. ■ Account for adequate resistance to severe weather and natural disasters. ■ Consider as relevant the emergency preparedness in the planning of buildings, such as provision for fire emergency evacuation. ■ Include provisions for maintenance of roads and drainage systems. The maintenance requirements should be feasible in the local context.	Project application / Project concept	Grantee	■ Construction reports
	Project Design	■ Ensure local communities are preferred for the supply of goods and services to the Project and Project personnel, where appropriate. - If materials and competences are available locally, they should be sourced locally provided it does not disturb the local economy or increase the pressure over endangered resources.	Site observations	Grantee	■ Random site inspection

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
	Project Design	■ Engage with communities and authorities at the earliest stage to understand the land ownership and land use situation. ■ Engage with the local community and potential affected households to understand their needs and identify the risk of damage to their livelihood basis by the Project.	Minutes of Meetings	Grantee	■ Project planning documents
	Indigenous People & Stakeholder Engagement	■ Engage/ communicate with communities and plan sufficient time for participation [7]. ■ Ensure regular consultations with the local authorities and communities regarding the management of construction. ■ On-going consultation processes should identify marginalised groups, including Indigenous People as per WB definition.	Project Documentation Stakeholder Engagement Minutes/FPIC	Grantee	■ Document review ■ Grievance records
	Grievance Mechanism	■ Document all grievances from workers, communities and other stakeholders formulated on a register along with the responses given. - Anonymity, if requested, shall be guaranteed.	Grievance Mechanism	Grantee	■ Review of grievance register
	Occupational Health & Safety	■ Ensure that all workers, suppliers and possible subcontractors are familiar and comply with the requirements and specifications of this ESMP ■ Sensitize Grantee and contractor on occupational health & safety (OHS). ■ Provide H&S induction and training and awareness to the workforce regarding H&S risks and mitigation measures (including indirect workers) tailored to Project scope. ■ Ensure reporting of incidents and accidents.	Trainings record Incident documentation Project reporting Grievance Mechanism in place and grievances recorded	Grantee Contractor	■ Check training records ■ Check incidents reports ■ Review of Contracts to ensure that Project requirements are included

[7] Refer to LLF ESMS documents, **Annex P – Stakeholder Engagement Plan Outline** and **Annex O – FPIC Protocol**, for further guidance on engagement with affected communities

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
Implementation / Construction	Grievance Mechanism	■ Ensure that all direct and indirect workers have access to and are aware of the Grievance Mechanism where they can raise workplace relevant complaints anonymously ■ Document all grievances from workers, communities and other stakeholders formulated on a register along with the responses given.	Grievance Mechanism	Grantee Contractor	■ Review of grievance register
	Labour Conditions	■ Ensure minimum legal labour standards as per ILO regulations (child/forced labour, sexual assault, no discrimination, equal opportunities, working hours, minimum wages) are met. ■ Contribution from community in the form labour is allowed, provided that contribution is voluntary and does not negatively affect livelihoods.	Grievance Mechanism FPIC.(if applicable)	Contractor	■ Inspection reports (also from labour authorities) ■ Review of grievance register and training records
	Labour Conditions	■ Ensure the workforce has access to primary healthcare on site, providing prescriptions. - As a minimum, first aid kits need to be available on every construction site. ■ Emergency services (next hospital, health centre or doctor) need to be identified and made available to workers in case of need. ■ Ensure provision of H&S and hygienic and sanitary facilities at the site, including shaded welfare areas, bathrooms, changing rooms and potable water. - Ensure toilets and changing rooms are separated between male and female employees.	Observations Grievance Mechanism	Contractor	■ Random site inspection
	Occupational Health & Safety	■ Provide H&S training to contractors and workers on the main risks on workers' health and safety related to work place, the safe work practices, the emergency procedures and the requirement of incident reporting. ■ Ensure the use of Personal Protective Equipment (PPE) tailored to the conditions workers are exposed to. - As a minimum foot plus head, hand, ear, eyes protection, depending on working position.	Minutes of Meetings Observations Appropriate H&S and sanitary facilities provided at site	Contractor Grantee	■ Check training records ■ Check incidents reports ■ Regular inspection ■ Review of grievance records

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
	Occupational Health & Safety	■ Record accidents and near misses continuously. ■ Implement incentive programme for incident recording.	Trainings record Incident documentation Project reporting	Contractor Grantee	■ Check training records ■ Check incidents reports
	Biodiversity and Natural Habitats	■ Limit vegetation clearing to areas within the site boundary where it is absolutely necessary to reduce habitat disturbance ■ Ensure revegetation of cleared areas (with recovered plants and other appropriate local flora) where possible after construction using native species	Vegetation clearing minimal Check pre-construction survey to make sure that site is not in wetland areas	Contractor	■ Random site inspection
	Emissions (Dust, Noise, Gases)	■ Reduce source of dust emissions at construction sites by watering of transportation roads during dry and windy conditions. - Generally keep roads in good condition. - Cover truck loads with canvas to avoid dust blow. ■ Using equipment and vehicles in appropriate technical conditions. ■ Ensure vehicles and equipment are switched off when not in use.	Observations	Contractor	■ Random site inspection ■ Inspection of roads
	Noise and Vibration Impacts	■ Reduce noise and vibration impacts during construction. ■ Limit the hours of operation for specific pieces of equipment or operations, especially mobile sources operating through community areas or close to residential houses. - Avoid vehicle movements at night. ■ Use of modern, state-of-the-art technology and limit the number of machines operated simultaneously.	The work conducted at night (between 10pm and 7am) only no noise and/or vibration, Grievance Mechanism	Contractor	■ Random site inspection ■ Review of filed grievances ■ Review of timesheets of workers

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
	Soil and Groundwater Contamination	■ Maintain high standards in general housekeeping on site. ■ Identify and store appropriately all material or hazardous substances like fuel or chemicals and provide solutions to remediate unforeseen leakage and spills. ■ Enforce appropriate waste management practices - Give priority to reuse of waste material upon disposal. - Collect and segregate wastes and ensure safe storage and in line with legal requirements.	Dedicated storage areas in place Waste Manifests	Contractor	■ Random site inspection ■ Review of waste inventories
	Soil Management	■ Implement best practices for soil management - Ensure appropriate storing of topsoil removed. After construction, topsoil will be used as backfill for restoration of the area. - Limit stockpile height to 2 m maximum to avoid soil compensation. - If construction takes place on inclined surfaces/slopes, ensure preventive erosion control measures are applied (e.g. plan to retain trees and other vegetation) ■ Reinstate the construction working area to the best possible after construction activities are completed	Topsoil stored and re-used	Contractor	■ Random site inspection
	Water Resources Protection	■ Implement best practices for water management - Prioritise the use of rainwater/storm water over surface water/groundwater abstraction by using harvesting equipment and systems on site. - Reuse wastewater wherever feasible. - Restrict excavation activities during periods of intense rainfall.	Water harvesting conducted No excavation during intense rainfall Project application / Project concept	Contractor	■ Random site inspection ■ Project planning documents
	Community Health & Safety	■ Implement good practices for traffic safety - Schedule traffic activities to avoid peak hours on local roads if feasible. - Ensure safe driving by Project personnel, e.g., through training/induction/incentives (best driver awards). ■ Ensure all H&S related incidents (e.g., observations, accidents) on site are recorded and followed up properly.	Observations Training attendance lists Grievance Mechanism Incident recording process in place	Contractor	■ Random site inspection ■ Check incident/ accident records

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
	Community Health & Safety	■ Restrict access to construction sites to non-authorized persons - Prevent physical access to the site fencing and/or guarding - Use appropriate signage	Access controlled	Grantee	■ Random site inspection
	Cultural Heritage	■ Ensure all chance finds of cultural heritage (e.g. graves, old ceramic, old building fragments) are reported immediately to the relevant authority. ■ If possible, avoid excavation in the ultimate neighbourhood of a chance find, fence the chance find and await instructions from the competent authority	Contractual documentation Chance finds records	Contractor Grantee	■ Random site inspection
Operation	Community Health & Safety	■ Ensure that a Grievance Mechanism is in place were the workforce or the community can raise relevant complaints anonymously ■ Target signage and outreach activities to improve public awareness of traffic changes and potential hazards for high-risk sections of public roads, including near the site and laydown areas. ■ Ensure safe driving by Project personnel (e.g. through training/induction).	Grievance Mechanism Warning signs Minutes of Meetings Driver Training Records as part of Induction training	Grantee Contractor	■ Review of grievance register ■ Inspection of traffic routes ■ Review of training records
	Waste Management	■ Implement relevant waste management procedures	Waste management procedure in place	Contractor or recipient of buildings	■ Review of procedure ■ Random site inspection

APPENDIX B ESCOP TEMPLATE

The table below provides a template of the ESCOP that can be used by the grantee and/or its contractor. In the table term "Project" refers to any infrastructure and/or small works like workshops, training centres, administrative buildings, shelter, storage, bridge, aviation tracks, roads, access roads, etc., and are assumed to have low E&S risks.

Project name:	
Project site location:	*Village, district, region, country*
The Grantee:	*Organisation receiving funding*
Implementation body:	*Contracted construction partner*
Project description: Objective and need for/ purpose of the project: Project features:	*Describe:* - *Type of Infrastructure to be built for this Project and its exact location* - *Project activities to be carried out (construction, operation and decommissioning).* - *Type of Machinery used* - *Key environmental and social risks and impacts of the activities expected* - *Type of E&S provisions required by national legislation (e.g. environmental declaration, etc.)* - *Organizational structure and responsibilities* *If possible and relevant include a location map. Provide quantitative data (volume, length, target population etc.) as available and relevant.* *Overview of the envisaged schedule, stakeholders involved in the project.*
Key Risks associated with the Project activities triggering ESCOP	*Please refer to the table on next pages for examples / guidance*

Project Stage: ☐Planning ☐Construction ☐Operation

Permitting Obligations Associated with this Project

List all permits that need to be granted by the administration of the host country to authorise the project, provide status of the document (incl. if the obligation has been lifted) and information of steps to be taken to receive authorisation to implement the project – if any

Document	**Status**	**Actions**
Water discharge Permit	*Granted*	*None*
Waste management Permit	*Pending*	*Needs to be ordered before start of operation*

Checklist filled by:	*name date signature*

Examples for key environmental, social and occupational health & safety risks of infrastructure and small construction works and mitigation measures are provided in the table below.

Activity	Key risks	Mitigation measures (make sure measure is part of construction activity specific list of requirements and included in contractors' agreements)
All activities	Employment of child labor	check material source workforce for personal identity documents, stop any employment/assignment of children and minors <16 yrs
Work on roads open to traffic (Street sweeping/cleaning of public spaces or Rehabilitation of small rural roads	Road accidents due to working in flowing traffic	Protect working area from flowing traffic: ■ warning signage and barriers ■ speed limits for flowing traffic during working hours ■ workers to wear safety vests for visibility ■ works only during daylight ■ workers to be deployed in teams (no work alone permitted)
Borrow pits / breaking of rocks (without machinery)	Eye injuries due to stone splitter (rock breaking)	All workers to wear protective googles
	Foot injuries (rock breaking)	All workers to wear appropriate shoes (closed, if possible safety shoes)
Hand-dug well construction/rehabilitation **Construction/rehabilitation of latrines** **Rehabilitation of small water distribution networks**	Accidents through collapse of trench/pit/well	■ Ensure trenches and pits are stabilized as required (if more than 1.25 m deep). ■ All earth pits/trenches more than 1.20 meters (or 4 feet) deep that a worker is required to enter, must be shored with timbers or be cut with embankment slopes of 1 to 1 (45 degrees). ■ When timber shoring is used, it must be installed progressively as the trench is being excavated. ■ Ladders must be used for getting into or out of a shored trench/pit and be placed so that a worker is protected at all times when using the ladder. ■ Work must not be performed in a trench/pit unless another worker is working above ground in close proximity to the trench or to the means of access to it. ■ Buried services such as gas lines, water lines, sewers and electrical services must be located and marked before excavation starts. ■ Excavations which workers are required to enter must be kept reasonably free of water. ■ Tools, equipment and excavated soil must be kept at least 1 meter (3 feet) from the edge of the excavation or trench. ■ Workers to be deployed in teams (no work alone permitted) and at least staff out of trenches ■ Consider external variable factors such as weather conditions and take appropriate measures
	Contamination of drinking water	Ensure that well is located within or more than 30 meters distance from potential source of contamination, e.g. latrine
Rehabilitation of simple structures (ground floor buildings)	Accidents due to collapse of non-stable walls or roofs	Assessment of need for stabilization and implementation of wall/roof stabilization prior to commencement of works
	Falling from heights due to unsafe or damaged ladders	**Apply safe work practices** for ladders

Activity	Key risks	Mitigation measures (make sure measure is part of construction activity specific list of requirements and included in contractors' agreements)
Working with small electrical equipment	Electric shocks	**Apply safe work practices** ■ Accidental contact with electrical components can have deadly consequences. Always refer to the manufacturer's recommended operating practices prior to using new electrical appliances, tools and equipment. ■ Use the following guidelines to reduce the risk of personal injury. ■ All electrical tools and appliances will be double insulated or have a three-prong plug-in. ■ Only qualified and authorized electricians are allowed to service and repair electrical appliances, tools and equipment. ■ Prior to operating electrically powered tools and equipment, ensure that you are working on a dry surface. ■ Tools with damaged cords, grounds and housing units are to be tagged "Out of Service" and sent for repair. ■ Missing or damaged ground plugs of any appliance, tool or piece of equipment are to be repaired prior to use. ■ Damaged extension cords shall be tagged "Out of Service", repaired or replaced as warranted. ■ Always stand to the side of a service box when resetting a breaker. ■ All electrical tools must be quality approved. ■ Disconnect power tools from power source before making adjustments. Defective equipment needs to be tagged "Out of Service" and removed. ■ Tools with electrical arcing brushes should be removed when you feel any tingling during use.
Health care service delivery, such as vaccination campaigns	Infections related to medical waste management (sharps and needles), endemic diseases, diseases that can be brought by external workers	Use medical waste management guidance as per WB EHS guidance

APPENDIX C DO AND DON'T TABLE

Topic	DO	DON'T
Land Use	■ Prefer already disturbed areas for workers' accommodation, storage, workshop and the worksite. ■ Ensure that unexploded ordnance (UXO) clearance has been carried out for the project site/work area. ■ Clearly mark "No-go" areas (cultivated lands or fruit trees, wetlands, grave sites or any sensitive environment or social site/area). ■ Avoid proximity to schools, health posts and households with vulnerable families. ■ Clean up the worksite and rehabilitate the site to its original condition. ■ Rehabilitate all temporary access tracks, haul roads and any other disturbed areas outside of the approved working areas to their original condition.	■ Do not enter any worksites and areas without permissions and approvals. ■ Do not damage any households and associated structures, cultivated lands, fruit trees or any other potential source of income. ■ Do not undertake any activity and park your vehicles outside of the working area borders.
Noise	■ Limit working hours for noisy activities working hours close to schools, hospitals, residents, religious buildings, etc. ■ Turn off vehicle engines if not required. ■ Keep the noise level to acceptable limits.	■ Do not undertake any noisy activity during night time.
Dust and Air	■ Minimize traffic wherever possible and drive slowly. ■ Spray the unpaved roads with water if you're working close to schools, hospitals, residential areas, etc. ■ Revegetate the disturbed areas as soon as activity is completed. ■ Drive slowly not to generate dust.	■ Do not store cement, sand, excavated material without cover sheets or shelters. ■ Do not clear the vegetation cover if it's not required.
Water	■ Refuel the vehicles at least 30 m away water courses. ■ Fence the construction site adjacent to the sensitive areas such as natural water courses, ponds, drains. ■ Divert the runoff / water the construction sites or disturbed areas, using ditches.	■ Do not use any natural water resources to supply water (e.g. springs, streams, lakes) without approval of relevant authorities, local leaders. ■ Do not discharge of hazardous substances, chemicals, construction material and wastes into water courses, ponds, drainage systems. ■ Do not block the water flow.

Topic	DO	DON'T
Waste	■ Keep the working site clean and tidy. ■ Store hazardous waste using secondary containment and restrict access to hazardous waste storage area to prevent harm to construction staff, environment and public. ■ Perform on site sorting to separate liquid, organic, demolition material, hazardous and recyclables waste streams and identity the disposal pathway for each of them. ■ Use waste containers without any damages and leakages. ■ Reuse the excavated soil as much as possible for backfilling, landscaping and for other project areas where excavation material is required. ■ Collaborate with local authorities to transport and dispose waste in accordance with legal requirements.	■ Do not burn any type of waste. ■ Do not dump waste at any unpermitted area and especially near watercourses. ■ Do not leave any sharp or dangerous objects (knives, box cutters, scissors, broken glass, etc.) that may attract children's attention living close to the construction site.
Employment and Labor Rights	■ Implement a fair and transparent employment process. ■ Provide workers with clear and understandable information regarding rights via contract documents in local language.	■ Do not discriminate any workers or job applicants on the basis of their gender, marital status, nationality, ethnicity, age, religion or sexual orientation. ■ Do not recruit children (under 18 years old) or use forced labour.
Code of Conduct	■ Establish a Code of Conduct for worker-community interaction and on-site behavior. Oblige workers to adhere to code of conduct.	
Grievances	■ Establish and maintain grievance mechanism accessible for workers.	
Community Safety	■ Establish and maintain grievance mechanism for local communities adjacent to construction sites. ■ Secure worksites (temporary bridges, traffic controls, barricades, signs and warning lights). ■ Demarcate open trenches with high visible temporary fencing, undertake monitoring after rainfall, and prevent flooding of trenches. ■ Inform relevant authorities immediately in case of damages on utilities such as underground and aboveground electricity lines, water lines, gas lines, oil pipelines, etc. ■ Establish appropriate site boundary and access controls near settlements to prevent unauthorized entry to construction or activity sites especially by children (e.g. fencing of construction section in the vicinity of settlements or communities).	■ Do not leave any holes and openings without secure fencing provided with fixed, clearly marked covers. ■ Do not exceed the speed limits.

Topic	DO	DON'T
Traffic Management	■ Implement speed limits for all Project vehicles. ■ Equip vehicles with reverse signals. Ensure that truck drivers are accompanied by a flagman or watchman while reversing, unloading and loading. ■ Train all drivers on safety provisions. ■ Avoid routes with blind curves, blind intersections and very narrow roads alongside steep slopes. ■ Avoid routes that are frequently used by locals. ■ Use local traffic signage and collaborate with the responsible local authorities and communities. ■ Keep access roads in good condition and free from deposits, waste, construction material. ■ Use flagmen where appropriate and install clear and visible signage. ■ Avoid vehicle traffic during hours that children are travelling to and from school.	■ Do not drive without a valid driver's license. ■ Do not use cell phones while driving.
Occupational Health and Safety	■ Provide health and safety training to all Project employees and familiarize workers with the risks related with their activities. ■ Conduct risk assessment and define mitigation measures for each activity. ■ Record and report any workplace hazards or any incidents or injuries. ■ Provide the right PPE and make sure that all employees use them. ■ Keep PPEs in good condition and change them in case they are damaged. ■ Prohibit usage of alcohol or illegal drugs. ■ Use the right tool for the activity. ■ Use undamaged ladders if you need to climb up. ■ Implement good housekeeping to prevent trips, slips and falls. ■ Conduct daily tool-box talks / conversations on health and safety issues before starting works. ■ Conduct medical examination for all personnel before the activities start. ■ Provide sufficient drinking water for workforce. ■ Provide and maintain toilet facilities for workforce separately for female and male workers. ■ Provide one trained first aiders per 25 employees and adequate amount of first aid kits on site.	■ Do not try to repair any broken equipment and machinery if you are not authorized. ■ Do not use of metal ladders close to overhead power lines ■ Do not work without PPE. ■ Do not work alone or isolated.

Topic	DO	DON'T
Housekeeping	■ Keep working areas clean and tidy. ■ Secure loose materials that have the potential to fall. ■ Keep aisles, stairways, passageways, ladders, etc. free of obstructions, materials, cables, chords, hoses, etc. ■ Keep materials away from the edge of excavations, trenches, roofs, etc. ■ Cover and secure open trenches, holes and other openings. Avoid pools of stagnant water in working areas. ■ Undertake daily clean-up of activity area.	
Hazardous Material Management	■ Store fuels, oils, chemicals and other hazardous materials on a suitably sized impervious and bunded base. ■ Label the containers clearly with content, handling, storage, expiration, and health and safety information. ■ Use drip trays during fueling and maintenance (e.g. changing oil) of equipment. ■ Install proper warning signs at hazardous material storage yards, lock gates and restrict access to authorized personnel. ■ Store hazardous waste using secondary containment and restrict access to hazardous waste storage area to prevent harm to construction staff, environment and public.	■ Do not smoke close to hazardous materials.
Fire Prevention and Control	■ Take all reasonable and precautionary steps to ensure that fires are not started as a consequence of Project activities on site. ■ Provide basic fire-fighting equipment available on site (including but not limited to, rubber beaters when working in grass/bush areas, at least one fire extinguisher of the appropriate type when welding or other 'hot' activities are undertaken). ■ Store flammable materials under conditions that will limit the potential for ignition and the spread of fires. ■ Train all employees on the fire risks and how to deal with any fires in case one occurs.	■ Do not light fire for any reason, incl. waste burning. ■ Do not throw your cigarette butts on the ground.

Topic	DO	DON'T
Stakeholders engagement / Indigenous Peoples	■ Run a FPIC process prior to site sitting and construction design when it may impact IPs directly or indirectly. ■ Take special measures for particular IP village characteristics, such as small population, local conflicts, customs and norms, when evaluating risks. ■ Build a specific code of conduct for worker-community interaction and on-site behavior approved by local leaders of the villages under the influence area of the construction. ■ Strengthen grievance and feedback mechanisms and law enforcement procedures, especially regarding gender-based violence, during the infrastructure and small works period. ■ Train and raise awareness for the workforce about unacceptable conduct toward indigenous community members, specifically women.	■ Do not consider as lower risk the influx of workers in a number that exceeds 50% of the host IP adult population in a village. ■ Do not start construction work or lodge workers in an IP village or on land traditionally owned by, or under the customary use of IPs without formal and documented authorization through a FPIC process.

APPENDIX D CHANCE FINDS PROCEDURE

Introduction

The activities associated with construction and operation, particularly ground clearance and excavation, have the potential to disturb, alter, or damage unknown or unrecorded cultural heritage sites, structures and objects. This is known as a 'chance find'. The grantee has to develop the chance finds procedure using this template to mitigate potential impacts to chance finds.

Purpose and Objectives

The purpose of the chance finds procedure is to define the process that governs the management of chance finds. The objectives are to:

- Ensure the preservation and appropriate treatment of chance finds while also minimizing disruption to the program schedule.
- Enable compliance with all relevant national laws, regulations and other applicable international standards listed in LLF´s ESMS manual (particularly WB ESS8 and respective guidance note).

Scope

The procedure applies to all activities conducted by the grantee and its subsidiaries, including its employees, contractors and subcontractors, which have the potential to uncover a cultural heritage site, structure or object. Potentially activities that require to develop and implement the chance finds procedure include but are not limited to construction/ renovation activities deemed at screening to have a negligible potential negative impact on cultural heritage (e.g., renovations to ranger shelters, etc.) or with a small/ negligible footprint. Examples of a cultural heritage site, structure or object that may be unexpectedly found include:

- Archaeological artefacts;
- Human skeletal remains; and
- Remains of historic infrastructure and objects.

Induction and Training

The grantee and its subsidiaries have to develop relevant content for a LL program's induction process. This content should also be issued to contractors and sub-contractors to disseminate to their employees prior to commencing program activities.

This should include, at a minimum, a basic understanding of how to identify potential cultural heritage sites, structures and objects, and who to contact if a suspected chance find is found.

Management of Chance Finds

If any member of the workforce discovers a cultural heritage site, structure or object, such as, but not limited to, archaeological artefacts, human skeletal remains and/or historical sites and objects during a program activity, the following steps shall be taken:

1. Stop all works in the vicinity of the find. All works within a 5 meter radius should be stopped.
2. Immediately notify the nominated person, such as the LL program activity supervisor, who will notify the E&S manager, or other relevant person(s).
3. Secure the site. The site will be secured to prevent any damage or loss of removable objects. In cases where removable antiquities or sensitive remains, a night guard shall be arranged.
4. Record details of the chance find. The LL program activity supervisor will record the details of the chance find in the chance finds report form (see below) and take photos of the find.

5. Notify the relevant parties. The E&S manager, or other relevant person(s), will notify the relevant authorities and the grantee´s senior management, and will work with them to identify the appropriate individual to conduct an assessment of the chance find. The grantee will consult[8] with affected communities who use, or have used within living memory, the cultural heritage for long-standing cultural purposes. The grantee will consult with the affected communities to identify cultural heritage of importance, and to incorporate into the grantee's decision-making process the views of the affected communities on such cultural heritage.

6. Undertake a preliminary investigation. A preliminary investigation will be undertaken by the identified individual in conjunction with the E&S manager, or other relevant person(s). The identified individual will make a rapid assessment of the chance find to determine its importance.

7. Develop a management strategy, based on the assessment, in collaboration with the relevant authorities, the senior management and the E&S manager, or other relevant person(s). Appropriate strategies may include:

   a. Avoidance: This option minimizes the impact to the chance find through partial or complete program activity redesign or relocation. This is the preferred option from a cultural resource management perspective.

   b. Salvage excavation: This recovery option is destructive and can delay program activities. If required, salvage excavation shall be conducted in accordance with the requirements of the relevant authority.

   c. Exhume: Exhumation of the human skeletal remains should be done in a manner considered appropriate by the relevant authority. This will involve the predetermination of a site suitable for the reburial or relocation of the remains. Certain ceremonies or procedures may need to be followed before program activities can recommence in the area of the discovery.

   d. In-situ management: This option includes the application of site protection measures, such as fencing or barricades, or capping the site area with fill. Appropriate protection measures will be identified and agreed between the H&S manager, or other relevant person(s) and the relevant authorities on a site-specific basis.

   e. Surface collection: If a chance find is assessed as having limited salvage excavation potential but contains significant surface archaeological items, the surface finds may be individually mapped and collected in consultation with the relevant authorities.

   f. Destruction: If a site is assessed as having limited archaeological significance, it may be destroyed once a complete photographic record has been made and a chance finds report form has been completed.

8. Implement the agreed strategy: Once the appropriate strategy is determined based on the chance find's significance, the E&S manager, or other relevant person(s), the activity supervisor and the relevant authorities will work to implement the strategy.

9. Resume work: Following implementation of the appropriate strategy and only after permission from the relevant authority is granted, program activities at the site can resume.

[8] Refer to LLF ESMS documents, **Annex P – Stakeholder Engagement Plan Outline** and **Annex O – FPIC Protocol**, for further guidance on engagement with affected communities

Record Keeping

The grantee´s E&S manager, or other relevant person(s) will be responsible for ensuring a chance finds report form is completed and logged for every chance find. A photo log, copies of communications with decision making authorities, conclusions and recommendations/guidance, and implementation reports, should be kept onsite for the duration of the LL program and/or program activity.

Chance findings Report Form

Chance Finds Report Form
Date of the find:
Location of the find description:
GPS coordinates:
Person who identified the find:
Was work stopped in the immediate vicinity (i.e. a 5 meters radius) of the find? ☐ Yes ☐ No
Description of find (fill in applicable information) (use additional pages if required): Photo Record: ☐ Yes ☐ No Type of find: _____ Brief description of Find (e.g., size, shape, number of items, color): Brief description of site and vegetation (e.g., surface sediment type, ground surface visibility, distance to nearest freshwater source, attach site sketch if necessary):
Relevant Authority Was a relevant authority contacted? ☐ Yes ☐ No If yes, please provide the following information of the relevant authority: Name:_____ Organization: _____ Contact details: _____ Documentation from relevant authority attached (e.g. assessment of find): ☐ Yes ☐ No
Impact Assessment Is site destroyed? ☐ Yes ☐ No Can further impacts to the find be avoided? ☐ Yes ☐ No Avoidance and mitigation measures discussed:

Impact to Find avoidance and mitigation outcome:
Activity supervisor sign-off Name: _____ Signature: _____ Date: _____
E&S manager (or another relevant person) sign-off Name: _____ Signature: _____ Date: _____