

# **COUNTRY SAFEGUARD SYSTEMS (CSS) SUBREGIONAL WORKSHOP**

## **RETA 7548: MAIN ENVIRONMENTAL ISSUES AND THEIR SOLUTION DURING PROJECT IMPLEMENTATION**

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# REFERENCES

1. **Environmental Audit Reports from 8 countries, around 35 projects (RETA 7548, audits: second half of 2013 – first half of 2014) – conducted by 3 consulting companies**
2. **Details of safeguards compliance status (Env) and recommendations for reviewed projects – ADB's environmental review mission (2014-2015)**
3. **Projects documents (EIA, IEE, EMR and etc.)**

# MAP



# ENVIRONMENTAL AUDITS

- ❑ Environmental Audits followed after Environmental trainings
- ❑ It started after 2-6 months conducted training
- ❑ Consisted of:
  - Documentations review
  - Joint site visits (PMOs, Supervision Consultant, Contractor and auditors)
  - On the job training



# CONDITIONS

- ❑ **Legislation base: environmental covenants in loans, bidding documents, contracts, existence SEMP's;**
- ❑ **Institutional set up: staffing, qualification;**
- ❑ **Implementation of measures indicated in EMP: construction site;**
- ❑ **Monitoring, reporting, audit;**
- ❑ **Public awareness, disclosure.**

# EXISTENCE OF ENVIRONMENT UNIT (EU) IN PROJECT IMPLEMENTATION UNIT (PIU)

	PMO/PMIs	Supervision Consultant	Contractors/ Sub-Contractors	Bid evaluation
<b>2013-2014</b>				
<b>National</b>	75%	54%	75%	3
<b>International</b>	7,6%	85%		1
<b>2015</b>				
<b>National</b>	100%		100% / (?)	?
<b>International</b>	10%	100%		?

# ENVIRONMENTAL MANAGEMENT PLANNING

Issues (Env. audit 2013-2014)	2014-2015 (Aide Memoire, discussion)	2015-2016 (Uzbekistan)
Quality of EMPs especially in part of env. monitoring	Slightly Positive	Slightly Positive
SEMPs copy EMPs attached to EIA/IEE	Slightly Positive	Slightly positive
No SEMPs on construction site	Positive	Slightly positive
SEMPs is not reviewed and approved by PMO/PIOs	Positive	Formally
Limited Site Specific Environmental Management Plan (SSEMP)	Positive	No changes
PMU's Environmental Specialists combines duties	Positive	Slightly positive
Lack of environmental performance skills of PMU's ES	Positive	Positive
Turnover Specialists in PMU's	No changes	Slightly positive
Inaccuracy in <i>bidding</i> documents and contracts	Positive	Positive

# RECEIVING GOVERNMENT PERMISSIONS

Per national legislations open or using existing borrow pits and boreholes, cutting trees and others – need permissions from state agencies

*Existing issues:*

Contractors does not follow national legislation:

*Reason:*

- ❑ Requirements *were not included* in Contracts, as consequences:
  - i. Contractors were not aware and started works without getting permissions;
  - ii. Contractors did not allocated sources for necessary payments.
  
- ❑ Requirements included – no timely and adequate control from Supervision Consultant and PMOs/PIUs side

# RECEIVING GOVERNMENT PERMISSIONS

There are noticeable *improvements*:

- ❑ Contractors getting all necessary permissions prior construction works
  - Permission on water use;
  - Sewage and domestic wastes disposal;
  - Permission on open and use boreholes pits;
  
- ❑ Contractors pay penalty for unauthorized activities

# SITE INSPECTION RECORDS, GRM AND REPORTING

Issues (Env. audit 2013-2014)	2014-2015 (Aide Memoire, discussion)	2015-2016 (Uzbekistan scale)
Project files and track records system on safeguards are not always exist or keeping properly	Positive	Positive
Results of previous monitoring no recorded and not tracked	Positive	Positive
Site inspection records are not included in EMR report	Positive	Positive
As per env. audit report (2013), only 36% of PMUs maintained complaints logbooks	Positive	Positive
Still in most of the cases complaints or communication are verbal, no records in logbook	Slightly Positive	Slightly positive
Delaying or non-submission of EMRs;	Positive	Slightly positive
Poor quality of reports no data on monitoring of environment	Slightly Positive	Slightly positive
Low involvement of Supervision Consultants in <i>env. performance</i>	Slightly Positive	Slightly positive

# ENVIRONMENTAL TRAINING



# PUBLIC DISCLOSURE

- Although ADB SPS (2009), Loan agreements require to disclosure environmental monitoring reports, it is *not common* practiced
- *Good example:*
  - ISDIP (KGZ), Talimarjan TPP (UZB), CAREC publication on agencies websites;
  - Communication with local population;
  - Involvement of NGOs

# NON - COMPLIANCE WITH SEMP (GENERAL) WASTE DISPOSAL ISSUES



# COMPLIANCE WITH SEMP: GOOD PRACTICE



# NON - COMPLIANCE WITH SEMP (GENERAL) OIL AND FUEL STORAGE AND DISPOSAL

## *Improper storage:*

- ❑ Not adequately equipped area for oil storage;
- ❑ Repair are conducted at the non-equipped place;
- ❑ No facilities and equipment for utilization leakages;
- ❑ No conventional signs;

# NON - COMPLIANCE WITH SEMP (GENERAL) OIL AND FUEL STORAGE AND DISPOSAL



# GOOD PRACTICE



More examples?...

# ROAD PROJECTS: ASPHALT PLANTS



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# EXCAVATION WORKS (WATER SUPPLY AND SANITATIONS)

## *Issues:*

- ❑ Temporary removing and storage of top soil;
- ❑ Improper leveling;
- ❑ Restate of trenches
- ❑ Restoration of borrow pits.



# WORKS ON LAYING PIPE LINES



# CONCLUSION AND RECOMMENDATIONS

- ❑ Obvious changes in environmental performance are noticeable;
- ❑ Activity under RETA 7548 and RETA 8663 had significant impacts and need to be continued;
- ❑ Environmental aspects during bid evaluation must be considered;
- ❑ More close collaboration PMU's environmental team with national environmental agencies is necessary;
- ❑ Environmental documentations at the project preparation and implementation stage could be improved.