MINISTRY OF PUBLIC WORKS (MoPW)

ROADS DIRECTORATE (RD)

TRANSPORT INFRASTRUCTURE AND CONNECTIVITY PROJECT (TICP)

PROJECT NUMBER: P155229

CONTINGENCY EMERGENCY RESPONSE COMPONENT (CERC) SUB-PROJECTS

ENVIRONMENT AND SOCIAL MANAGEMENT PLAN (ESMP)

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ABBREVIATIONS AND ACRONYMS

ARAP	Abbreviated Resettlement Action Plan
AGYW	Adolescent Girls and Young Women
CERC	Contingency Emergency Response Component
CLO	Community Liaison Officer
DMA	Disaster Management Authority
DTT	Department of Traffic and Transport
EHS	Environment, Health and Safety
EU	European Union
ESF	Environment and Social Framework
ESA	Environmental Site Agent
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Safeguards
ESSS	Environment and Social Safeguards Specialist
GBV	Gender Based Violence
GIIP	Good International Industry Practice
GoL	Government of Lesotho
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immunodeficiency Syndrome
HQ	Head quarters
IDA	International Development Association
ITP	Integrated Transport Project
KPI	Key Performance Indicator
LAP	Land Acquisition Plan
LENASO	Lesotho Network of AIDS Service Organization

LITIS	Licensing System together with a Traffic Management Information System
MoH	Ministry of Health
MoPW	Ministry of Public Works
MoT	Ministry of Transport
NDRTF	National Disaster Relief Task Force
NRSC	National Road Safety Council
OHS	Occupational Health and Safety
OP/BP	Operational Policies/Bank Policies
OFID	OPEC Fund for International Development
PAPs	Project Affected Persons
PIU	Project Implementation Unit
PM	Project Manager
PSC	Project Supervision Consultant
RD	Roads Directorate
RF	Road Fund
RPF	Resettlement Policy Framework
RSD	Road Safety Department
RRMP	Road Rehabilitation and Maintenance Programme
SEA	Sexual Exploitation and Abuse
SEAH	Sexual Exploitation, Abuse and Harassment
SHE	Safety, Health and Environment
TB	Tuberculosis
TICP	Transport Infrastructure and Connectivity Project
WB	World Bank

EXECUTIVE SUMMARY

The Transport Infrastructure and Connectivity (TIC) Project is the successor to the Integrated Transport Project (ITP), with a total funding of **US$18.3 million equivalent**, with four (4) main components:

- **Component 1:** Improving the road infrastructure access.
- **Component 2:** Improving road safety.
- **Component 3:** Implementation support and capacity building**.**
- **Component 4:** Contingency Emergency Response Component (CERC).

This ESMP is prepared for management of CERC sub-projects that have been proposed under component 4, following the Lesotho Disaster Management Authority (DMA) declaration of the road infrastructure disaster due to heavy rains between December 2020 and March 2021 that caused serious damage on road infrastructure consequently disconnecting many communities from essential social services such as hospitals and schools. Eleven (11) road sessions, and associated drainage structures that need urgent rehabilitation were previously identified by Road Directorate (RD). However, only 10

will be financed through the TIC Project, located in various areas across the country: two (2) projects in Maseru, one (1) in Leribe, three (3) in Berea, two (2) in Mohale's Hoek, one (1) in Quthing, and one (1) in Thaba-Tseka. The construction works are scheduled to last for a maximum of six (6) months.

POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

The implementation of the CERC project will be guided by the applicable Government of Lesotho's, World Bank Environmental and Safeguard Policies, and the international policies, legal and regulatory frameworks, listed in table 1 below.

Table 1: Key applicable national, World Bank, and international policies, legal and regulatory frameworks.

National policies, legal and regulatory frameworks	World Bank policies, legal and regulatory frameworks	International policies, legal and regulatory frameworks
• The constitution of Lesotho. • Environment Act 2008. • The land Act 2010 as amended. • Labour code order of 1992. • Water Act no. 15 of 2008. • Water resources Act, 1978. • Lesotho water and sanitation policy. • Local government Act no. 6 of 1997. • Chieftain ship Act, 1968. • Historical monuments, relics, fauna and flora Act of 1967. • Public health order no. 12 of	• World Bank Environmental and Social Safeguard policies: Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Physical Cultural Resources (OP/BP 4.11), Involuntary Resettlement (OP/BP 4.12). • World bank group EHS guidelines. • ESF/safeguards interim note: COVID-19 considerations in construction/civil works projects.	• FIDIC HIV and AIDs guidelines. • Convention on biological diversity 1992. • United Nations convention to combat desertification in those countries. • Protocol to prevent suppression and punish, human trafficking in persons. • Revised African convention on conservation of nature and natural resources. • SADC protocol on wildlife conservation and law enforcement.

1970. • Forestry Act,1998. • Forest regulations 1980. • Road traffic Act 1981. • Hiv/aids prevention (labour code) 2006. • Sexual offenses Act 2003. • Child protection and welfare Act 2011.		

ENVIRONMENTAL AND SOCIAL BASELINE AND SCOPE OF WORKS

The conditions of the roads under the 10 proposed sub-projects are generally poor, with excessive erosions in various locations, and undermined, and damaged structures such as gabions, vented ford structures, embankments, etc, due to floods.

Rehabilitation, and continuous maintenance of these structures is very important to the communities as they will tremendously improve the socio-economic growth within the areas and the much-needed service delivery amongst the people in these areas, more commonly, the most vulnerable, such as elderly, students, people with disabilities, children and women.

The scope of works for the 10 projects is generally:

- Construction of masonry stone walls;
- Provision of drifts;
- Low level bridges in river crossings;
- Re-gravelling works;
- Protection Works on inlet and outlet of structures;
- River training works;

- Slope protection works;
- Erosion protection works through provision of silt traps; and
- Proper sighting of structures in stream/river crossing such that river/stream regime is not affected/impacted both upstream and downstream

ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATIONS

The implementation of the CERC sub-project activities broadly positive to the community as they improve access to social services, such as schools, churches, clinics, local councils, social events (e.g. funerals) etc., and does urgently needed to address the damage to the road infrastructure that was declared emergency by the government of Lesotho through Disaster Management Authority (DMA). However, due to the nature and scope of the works, there are potential negative environmental and social risk/impacts, which are expected to be moderate, localized, and temporary. The types of additional works to be supported under the CERC are similar in nature to those already covered by the parent project. The Project remains a Category B and no new safeguards policies are expected to be triggered. Therefore, the CERC sub-projects are classified as category B projects, and will trigger four safeguard policies being: Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Physical Cultural Resources (OP/BP 4.11), and Involuntary Resettlement (OP/BP 4.12).

The anticipated risks/impacts will be appropriately managed through implementation of this ESMP, and other CERC project safeguards instruments such as CERC Environmental and Social Management Framework (ESMF), Land Acquisition Plan (LAP), as well as the parent project ESMF, Resettlement Policy Framework (RPF), and the ESMP for the footbridges and its monitoring tools, with close supervision by the Component 1 & 4 Project Manager and E & S compliance monitoring by TICP and RD Environmental and Social Safeguards team. Furthermore, project activities that may result in permanent loss of community assets, such as relocation of households, and interference with community land use and livelihoods will not be supported.

Risks/Impacts anticipated as a result of project activities include, inter alia: increased dust; soil erosion; loss of vegetation and forest; impact on aquatic fauna; water, and air pollutions; increased generation of waste; occupational health and safety; community health and safety; temporary land take for borrow pits, storage areas, site camp, etc.,; community conflicts that may result due to unfair hiring practices; temporary disruption of social activities; and blocking of ways to other services due to ongoing construction works; and increased GBV/SEAH among project workers and communities.

There is also possibility of blocking of river flows; washing of clothes or vehicles or machinery in the river; borrow pits and sand quarrying; digging into archeological objects; etc.,

The projects are also anticipated increase in disease transmissions among workers, and communities such as HIV/AIDs and other sexually transmitted diseases, COVID-19, and Tuberculosis (TB), and other airborne transmitted diseases; theft of construction materials, equipment, and machinery; Trespassing and farming of livestock on project areas, and fire hazards due to open fires or smoking that may cause damage to community properties, such as fields, grassing land, etc.,

The anticipated risks/impacts are expected to be manageable through implementation of the mitigation measures outlined in this ESMP, which include among others; appropriate use of Personal Protective Equipment (PPE); securing or fencing of construction areas with safety signs installed; implementation of erosion control measures; no clearance of sites prior to approval and surveys; proper management of sediment (use of sediment screens), and machine/vehicle waste fuels (spill controls measures); rehabilitation of sites at the end of the construction works; proper management of all forms of waste; sensitization of workers and communities on GBV/SEAH, HIV/AIDs, TB, COVID-19 management protocols; and continuous engagement of communities to ensure no disruption of other social activities and services. No open fires shall be permitted outside of the work areas; Furthermore, all project workers, including contractor staff shall be required to adhere to the requirements, and prescribed risks/impacts mitigation measures.

INSTITUTIONAL ARRANGEMENT FOR ESMP IMPLEMENTATION

CERC projects ESMP implementation will be led by MoPW, through TICP PIU, and the RD staff, such as Component 1 and 4 Project Manager, TICP Environment and Social Safeguards Specialist (ESSS), TICP Community Liaison Officers (CLOs), RD Environment and Safety Manager, RD Sociologist, and RD site engineers. RD will also engage a Project Supervision Consultant (PSC), who will supervise all the 10 CERC projects under direct supervision of the Component 1&4 Project Manager (PM). The key personnel of the PSC will be resident engineer, and environment and social specialist. The PSC will supervise the project contractors who are also required to engage a full time Safety, Health, and Environment (SHE) officers, to implement the requirements of the ESMP on daily basis.

CAPACITY BUILDING

Successful implementation of the ESMP depends on the capacity of the key environment and social implementation team, and the project supporting staff. As a result, the following capacity building activities will developed for CERC sub-projects: Capacity building for MoPW, RD, and TICP E&SS team, which include, among others; training of CLOs by Lesotho Network of AIDS Service Organization (LENASO) on GBV/SEAH, and HIV/AIDs; capacity building for construction contractors which covers topics such as environment, health and safety at work place, managing COVID-19, HIV/AID, TB, and GBV/SEAH risks at the work place (contacted by LENASO), implementing project GRM, waste management and other topics that the project manager may see necessary.

MONITORING AND REPORTING REQUIREMENTS

The following monitoring and reporting framework will be adopted for effective implementation of the ESMP:

- Adaptive management – the ESMP allows for continuous review and flexibility in environmental and social management decisions made on the Project.
- ESMP periodic monitoring and reporting by RD, and TICP – the RD and TICP ESSS team will continuously monitor and report on the performance of the project ESMP from site establishment, and construction phase on weekly and monthly basis using the monitoring tools in annex 10.1, 10.2, and 10.3. A full review and E&S audit shall be undertaken annually, and reports shall be shared with the World Bank.
- ESMP monthly monitoring and reporting by PSC – the PSC shall prepare and submit to RD and TICP monthly report on the construction works, planned works, environment and social safeguards compliance, and expenditure at the end of each calendar month.
- ESMP monitoring and reporting by contractor – All CERC contractors shall be required to prepare a monthly report, guided by weekly and monthly ESS monitoring checklist that the contractor is required to fill, verified and signed by the CLO.

INFORMATION DISCLOSURE AND STAKEHOLDER CONSULTATIONS

The World Bank and the Government of Lesotho's environmental procedures requires that the environment and socials safeguards documents are disclosed to the general public and the project affected persons for review and inputs. The following framework shall be followed for successful information disclosure and engagement of project stakeholders:

- Documents disclosure – all the safeguards documents prepared for the parent project (TICP), and the CERC such as the ESMF, RPF, Generic ESMP for the footbridges, has been disclosed to the public upon approval by the World Bank. Similarly, this ESMP shall be disclosed in-country upon approval by the World Bank.
- Stakeholder Engagements – this ESMP requires that public consultation and stakeholder engagement is carried out continuously throughout the lifetime of the project as a means of gathering information on public concerns, issues, perception, fears and suggestions on proposed projects. The consultations shall be conducted in appropriate means convenient to different types of stakeholders, taking into consideration the vulnerable groups, such as people with disability, elderly, etc., and in appropriate language including the local language of the affected communities.
- Grievance Redress Mechanism (GRM) – will be implemented, and project affected persons be made aware of the procedures as a formal avenue for affected groups and all other stakeholders to engage with the Project. The following GRM framework will be implemented:
    - Grievance redress process – the grievance redress process will be well defined and all stakeholders shall be made aware of the process, which include: ensuring that a number of uptake channels are used to identify and accept the grievance, all grievances are logged/ recorded in the grievance register, and the AP receive acknowledgment of receipt within 4-7 days; all grievance are responded to in timely and fair manner following the appropriate handling steps; and all responses are signed off by the provider and AP;
    - Establishment of grievance redress committee – each project site shall have a grievance redress committee, established through coordination of the site CLO, and shall comprise of (as the minimum), the RD representative, TICP representative, Contractor representative, Community representative, local active NGOs representative, etc. the GRC will be responsible for handling and implementation of the project GRM at the project level, prior to referral of the grievances to the MoPW, through RD when necessary.
    - Ombudsman/court of law – the GRM shall allow for connection and referral of the project grievances to the national legal systems, if the AP is not satisfied with the provided resolution, or find it necessary to do so.

ESMP IMPLEMENTATION BUDGET

The ESMP budget for each of the CERC project is estimated at 10-12 percent of the individual project construction cost, and is largely operational, hence is built into the individual projects contracts, and TICP operation budget.

1 INTRODUCTION

1.1 PROGRAM DESCRIPTION

Enabling rural communities to access basic socio-economic services ranks highly in Lesotho's transport sector policy. In 1996 the country launched a US$129 million 5-year. Road Rehabilitation and Maintenance Programme (RRMP) that was funded by the IDA, the EU and the Government of Lesotho (GOL). Issues of access also featured prominently under the Integrated Transport Project (ITP), which was launched in 2006 as a successor to the RRMP, with a combined budget of US$38.2 million. A 2015 World Bank evaluation mission concluded that the implementation of the ITP was a success, the objective of improving access to services and market opportunities having been fully achieved through a better managed and affordable transport system.

The Transport Infrastructure and Connectivity (TIC) Project is the successor to the ITP, with a total funding of **US$18.3 million equivalent**, by the IDA, the OPEC Fund for International Development (OFID), and GOL. Building on the achievements and lessons learnt from the ITP and other earlier initiatives, its overall objective is to improve access to social services and markets through the provision of safe and sustainable secondary road connections in targeted areas of Lesotho.

The infrastructure components of the TIC project consist of the rehabilitation and maintenance of selected secondary roads and the construction of footbridge infrastructure.

Component 1: Improving the road infrastructure access: -The first component comprises the physical works for road rehabilitation and maintenance to improve road connections of population to agricultural markets and tourism sites and to ensure sustainability of road assets:

Component 1(a): The introduction of output and performance based contracts for improvement and maintenance of about 100km of secondary gravel roads in high agricultural production and tourism growth areas. The project envisions supporting the Road Directorate to implement OPRC approach for road maintenance for the first time in the country, taking into account international best practice, as well as regulatory and competitive concerns, and to set the stage for rolling out this approach across the country.

This is a new concept for Lesotho, which would make “Road maintenance” a more attractive business for private sector contractors and provide an opportunity for a more cost-efficient use of public

spending in road sector by shifting some of the risks and responsibility for the quality of infrastructure provision to the private sector. This subcomponent is intended to promote both short-term (during rehabilitation) and longer-term (during maintenance phase) local employment opportunities in road construction industry. The bidding documents and contracts will be designed to include specifications for the contractor to employ the local population in the road works, specifically encouraging women to apply, and provide sufficient training to allow those that are
unskilled to have an equal chance; and

Component 1(b): The construction of footbridges to provide the needed all-weather connection over a river or challenging terrain access to education, health services and markets, to the settlements, currently cut off from the nearest road connections, women in particular. The component provisionally proposes to construct 19 footbridges. Specification of employing locally 100 percent of the unskilled labor force for the footbridges works, including at least 25 percent of the local female labor force, will be included in bidding documents and contracts. This component also includes the carrying out of the following studies and services:

- Consulting services for an assessment study for introduction of Output and Performance-based contracting on a selected number of secondary road networks;
- Consulting services to prepare design and Environmental and Social Impact Assessment of the selected footbridges (including the preparation of Resettlement Action Plan if required); and
- Consulting Services for monitoring/supervision of the OPRC-contracts.

Component 2: Improving road safety: - This component addresses road safety in a more integrated manner in order to achieve the Government's objective to meet the global decade of road safety aim of halving road deaths between 2010 and 2020. The following activities are supported under this component: Component 2(a): Support for capacity building and institutional strengthening of the Road Safety Department of MoW, and MoT and operationalization of NRSC. The Road Safety Department (RSD) is effectively the lead agency for road safety in Lesotho, and provides equipment and support to the traffic police and other government departments. Following the launch of the National Road Safety Council (NRSC), establishment of which was recommended under the ITP, this Department will become its secretariat. This subcomponent will potentially support the following activities: (i) capacity building of the RSD and NRSC (this support is entirely contingent on the full operationalization of the latter and completion of road safety reforms initiated under ITP), (ii) provision of road safety equipment to the RSD and traffic police; and (iii) consulting services to carry out identification and design of accident blackspots; and Component 2(b): Establishment of an integrated system for

licensing drivers and vehicles, including enforcement records. Whilst principally offering improvement to the management and revenue collection procedures for these services, there will also be road safety benefits from improved driver licensing and vehicle inspection. This subcomponent will include support with the implementation of the new Integrated Vehicle Registration and Drivers' Licensing System together with a Traffic Management Information System – entitled the Lesotho Integrated Transport Information System

(LITIS), under which vehicle inspections are expected to be contracted out to the private sector. Currently, this responsibility lies with the Ministry of Public Works, and Ministry of Transport through its Department of Traffic and Transport (DTT). Under the ITP, an assessment of vehicle inspection and driver licensing system recommended that the process be privatized (SweRoad, 2014), however, no progress has been made since towards it. The proposed project will address this issue, should the government decide to move forward with this recommendation.

Component 3: Implementation support and capacity building: - This component will include the necessary project implementation support, including implementation of citizen engagement mechanisms, HIV/AIDs and gender targeted activities, and capacity building support to the RD and MoPW and MoT to effectively roll out, administer and monitor OPRC contracts and mitigate road safety risks:

a) Consulting services to assist the MoPW and MoT in preparation of the National Transport Master Plan (NTMP);
b) Project implementation support to the MoPW and MoT and Roads Directorate;

Support in implementation of citizen engagement mechanisms and HIV/AIDs and gender targeted activities. This will include the following, *inter alia*: (i) behaviour change and awareness raising activities on HIV/AIDS prevention among beneficiary communities to address the limited knowledge and reduce discrimination and stigma towards HIV affected people; (ii) awareness raising and behaviour change training activities among female and male beneficiaries on GBV prevention, care and reporting mechanisms; (iii) establishment of gender-balanced monitoring committees in each beneficiary community to facilitate a continuous dialogue and collaboration between communities, the Roads Directorate and the contractor at campsites; and (iv) development of *ad hoc* mechanisms to allow beneficiaries to report feedback and concerns associated with the implementation of Project activities and collaborate toward its improvement; Implementation of evidence-based interventions targeting AGYW: (i) to reduce their vulnerability to HIV/AIDS increased due to higher traffic level as a result of better road connections; and (ii) increase their agency (tentatively proposed subject to

availability of additional funds); Independent technical audits of the civil works implemented under the project; and Capacity building and training to the staff of RD, Road Fund (RF), and MoPW and MoT in OPRC contract management and road safety measures, etc.

Component 4: Contingency Emergency Response Component (CERC)

This component allows for the possibility to access resources for eligible expenditures in the event of an Eligible Crisis or Emergency, to provide immediate response to the Eligible Crisis or Emergency, as needed. This component was proposed for incorporation into the project with zero allocation, given that Lesotho remains vulnerable to climate change with rising temperatures and rain deficits.

1.2 CERC PROJECT OVERVIEW

Lesotho has experienced heavy rains between December 2020 and March 2021. Various sectors such Agriculture, Roads and health were negatively affected by the widespread rains. In January 2021, the Lesotho Disaster Management Authority (DMA) declared serious damage on road infrastructure consequently disconnecting many communities from essential social services such as hospitals and schools. This aggravates challenges that the Transport Infrastructure Connectivity Project (TICP) Component 1 attempts to overcome. The rapid assessment carried out by DMA in January indicates that about 54 bridges were completely damaged with 20 partially damaged. The number of roads with partial damage sits at 127 with 56 completely damaged. There also 36 culverts completely damaged while 41 are partially damaged (DMA 2021).

Road Directorate (RD) as the custodians of road infrastructure have also taken their own quick Damage Needs Assessment (DNA). Eleven (11) road sections and associated drainage structures have been identified by the GoL, through RD, as priority to restore connectivity of the population that is cut off from basic social and economic services, hence the list of CERC activities in Table 1.1 below. However, project number 5 (Mosala – Raleqheka Tlali) (highlighted in red), has been taken out, and will not be financed under CERC projects, as it was mistakenly selected, resulting in 10 CERC projects.

Table 1.1: Locations for CERC activities

District	Location	Activity
1. Maseru	Mazenod – Au	Ha Jimisi mini-bridge/major culvert construction

2. Maseru	Mahloenyeng – Khitione	Mahloenyeng bridge construction
3. Thaba Tseka	Lephoi - Likamoreng	Spot improvement
4. Berea	Mateka – Pulane	Spot improvement
5. Mafeteng[1]	Mosala – Raleqheka Tlali	Bridge reconstruction + spot improvement
6. Mohale's Hoek	Siloe – Likhoele	Reconstruction of crossing approaches
7. Quthing	Mt. Moorosi – Makoae	Spot improvement
8. Mohale's Hoek	Seaka – Ketane	Spot improvement
9. Leribe	Selomo - Tsime	Culvert desilting, spot improvement and river draining
10. Berea	Lenkoane- Nkhahle	Reconstruction of culvert crossing, spot improvement
11. Berea	Bobojane - Tsereoane	Spot improvement and gabion reconstruction

1.3 CONSTRUCTION SCHEDULE

The estimated construction, and maintenance period for each project site is six months, however construction activities at these 10 locations are mutually exclusive.

1.4 RATIONALE FOR PREPARING THE ESMP

Implementation of the activities will be positive and urgently needed. However, due to the nature and scope of the works, there are potential negative risk/impacts, which are expected to moderate, localized, and temporary. These risks/impacts can be mitigated through the implementation of the ESMP and other safeguards instruments of the Project, with close supervision by the project manager and E & S compliance monitoring by the Environmental and Social Safeguards Specialist.

[1] Site excluded under CERC projects

CERC projects will involve civil works (physical works for road rehabilitation or maintenance to improve road connections) and thus triggers World Bank's environmental assessment policy (OP.4.01). The potential adverse impacts will range from small scale and site specific to medium scale infrastructure investments associated with Environmental Assessment ***Category B*** projects of the World Bank. The TICP CERC sub-projects are thus determined to be a Category B projects, and will trigger the following four operational policies: Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Physical Cultural Resources (OP/BP 4.11), and Involuntary Resettlement (OP/BP 4.12)

The ESMP is prepared in line with the relevant environmental and social regulations of the Lesotho legal framework and the World Bank's Environmental and Social Safeguard Policies as detailed in the project's environmental and social safeguards instruments such as the CERC ESMF and RPF[2], and the parent project ESMF[3], and generic ESMP for footbridges[4]. The CERC ESMF requires Ministry of Public Works (MoPW) to draw up environmental and social management plan so as to determine the appropriate extent and type of environmental and social impacts of the proposed CERC projects. This process has been undertaken and the result shows that these projects are now envisaged to have moderate environmental and social impacts resulting from the construction activities. This ESMP has been prepared to set out the site-specific mitigation, monitoring and institutional measures to be taken during implementation to eliminate adverse environmental and social impacts, offset them or reduce them to acceptable levels. The process of development of the ESMP was a consultative process that involved continuous discussions between the Ministry of Public Works, Ministry of Transport, DMA, RD, and many other relevant stakeholders. The consultative process also included guidance as well as the technical inputs of the World Bank at the Country level, Regional and HQ level. The involvement of the communities was also fostered through the engagement of communities through community gatherings where chiefs, councilors as well as project affected communities participated (Annex 10.6).

[2] http://documents1.worldbank.org/curated/en/252621498681202808/pdf/SFG3471-RP-P155229-Box402916B-PUBLIC-Disclosed-6-28-2017.pdf

[3] https://documents1.worldbank.org/curated/en/516191498681117803/pdf/SFG3470-V1-EA-155229-Box402916B-PUBLIC-Disclosed-8-17-2017.pdf

[4] https://documents1.worldbank.org/curated/en/873791501187882999/pdf/SFG3470-V2-EA-155229-Box402916B-PUBLIC-Disclosed-8-1-2017.pdf

1.5 OBJECTIVES OF THE ENVIRONMENTAL MANAGEMENT PLAN

The objectives of the Environmental Management Plan (EMP) are to:

- Propose mitigation measures that will minimize the magnitude of impacts associated to project implementation activities.
- Recommending measures which will reduce each environmental and social impact considered to be significant enough to require a degree of control.
- Comply with all the environmental laws and regulations of the GOL, and the World Bank.
- Develop a monitoring plan which will monitor the performance of the Project and effectiveness of mitigation measures; determine compliance with regulatory framework and provide for remedial actions in cases where monitoring identifies a shortfall in targets for which corrective action is possible.
- Achieve sustainable and environmentally and socially acceptable development interventions for the Project and the sub-contractors on environmental and social management strategies.
- In order to achieve the above objectives, the following have been taken into account during the formulation of the ESMP:
    - Outlining measures to be adopted in project planning and design to avoid or minimize adverse impacts on the environment and affected communities
    - Formulating specific mitigation measures to avoid or minimize the adverse impacts of pre-construction, construction, and post-construction phases of the Project.
    - Preparing a plan to monitor the implementation of the mitigation measures and their effectiveness in combating the adverse impacts.
    - Establishing an institutional mechanism for ESMP implementation, monitoring, and reporting.
    - Creating an environment in the workplace with the least possibility of danger, accident or catching an illness. The key is risk management and zero compromise with regard to health and safety hazards.
- The plan is limited to how the workplace would operate. It includes the areas where risk is high and the plan to minimize such risk and the action to take in case of an adverse incident and contingency plans in the event that this action fails.

2 POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

This section presents policy, legal, regulatory and administrative frameworks within which the construction activities and its environmental and social impacts and mitigations will be implemented. Preparation and implementation of proposed activities shall be grounded on compliance to the national legislation, World Bank Operational safeguards policies as well as international policies and legal requirements ratified by Government of Lesotho.

2.1 NATIONAL REGULATORY FRAMEWORK

The following section outlines relevant elements of the national regulatory and policy framework:

2.1.1 THE CONSTITUTION OF LESOTHO

Section 36 of Lesotho's Constitution related to conservation and management. It states that; -"Lesotho shall adopt policies designed to protect the natural and cultural environment of Lesotho for the benefit of both present and future generations and shall endeavor to assure all citizens a sound and safe environment adequate for their health and well-being.

2.1.2 ENVIRONMENT ACT 2008

The 2008 Environment Act is aimed at providing for the protection and management of the environment and the conservation and sustainable use of the resources of Lesotho. Another objective of the Act is to introduce the phenomenon of an EIA and audits and the monitoring of projects. This Act makes an EIA a requirement for authorization of certain listed projects which are likely to have a significant impact on the environment. The Act further makes provision for procedures to be followed prior to and in the undertaking of an EIA. The Act vests power in the relevant Minister to issue EIA regulations regarding the projects which must be subjected to an EIA while the Director of the Department of Environmental Affairs (DoE) has the power to formulate guidelines concerning the conduct of an ESIA.

Section 4 of the Environment Act provides for right to a clean and healthy environment. This section further permits any person whose right to a clean and healthy environment is threatened, to bring an action to court of the competent jurisdiction against the person whose activity or omission is causing or is likely to violate the aforementioned right. The complainant may seek any of the following remedies.

The Environment Act, 2008 is based on the principle of sustainable management of natural resources, with provisions for corrective action to protect, maintain and enhance the environment using instruments such as environmental and social impacts assessments (ESIAs), audits and monitoring of impacts of development activities. The Act makes provision for environmental quality criteria,

standards and guidelines for air, water, effluent, noise vibrations, radiation, solid waste, etc.; and ensures sensitivity to local concerns and needs by providing environmental planning procedures and guidelines for the use of local resources at the local level as well as for community participation.

As in the case of many other environmental authorities, and the World Bank, Lesotho uses a classification system to determine the need for an EIA as a basis for decision making. The legislation requires that for all projects listed in Part A of the first schedule, an Environmental License is applicable and the developer must prepare a document referred to as a 'Project Brief'. The document must be submitted to DoE and the relevant Line Ministry for assessment according to the Act and other relevant regulation, and in order to determine whether an environmental assessment is necessary.

Not all projects and activities that are on the schedule will require a full environmental impact study (EIS). In practice, only a relatively small percentage are likely to do so. The Part A schedule contains an extensive list of activities among which are (new) main roads and other roads in wooded or mountainous areas. Road rehabilitation and footbridges are not referenced. Therefore, the CERC projects due to their emergency nature, and scope does not require preparation of project brief, and ESIA.

2.1.3 THE LAND ACT 2010 AS AMENDED

It is the primary land administration law in Lesotho that provides for the allocation/grant of titles to land, the conversion of titles to land, the better securing of titles to land, the administration of land, the expropriation of land for public purposes, the grant of servitudes, the creation of land courts and the settlement of disputes relating to land. The TICP will adhere to this act during implementation of Land Acquisition plan (LAP).

2.1.4 LABOUR CODE ORDER OF 1992

The Labour Code sets very specific requirements for workers who will engage in construction and the permanent staff who will be recruited to provide labour for the CERC projects. The Labour Commissioner enforces the Labour Code. The TICP, RD, and Contractors in implementing the projects should observe provisions of this statute whose requirements include:

Part IV covers wages fixing.

Part V covers contracts of employment, termination, dismissals, severance pay.

Part VI covers provisions for protection of wages.

Part VII makes provision for health, safety and welfare at work.

Part VIII makes provision for weekly rest, hours of work, holidays with pay, educational leave and sick leave 20.

Part IX covers employment of women, young persons and children.

Part X deals with labour agents.

Part XI covers contracts of foreign services.

Part XII makes provision for employment of non-nationals.

Part XIII makes provision for trade unions organizations and employers' organizations establishment and registration.

Part XIV deals with trade unions and employers' organizations membership officers, rules.

Part XV provides for unfair labour practices.

Part XVIII covers settlement of trade disputes.

2.1.5 WATER ACT NO. 15 OF 2008

The Act provides for protection of wetlands, natural springs and wells. The statute also stipulates that: Section 20(1) No person shall engage in an activity of using or abstracting water without a water use permit. Section 2(1) No person shall engage in waterworks activities without a construction permit. Section 27(1) a person who wishes to discharge effluent into watercourses shall obtain a permit in accordance with the Environment Act 2008. The Client and Contractors are obligated by the provisions of this statute for the implementation of this project for abstraction of water, engagement in water works and discharge of effluent into watercourses as stipulated in the Environment Act 2008.

2.1.6 WATER RESOURCES ACT, 1978

A law that provides for the control, protection and conservation of water resources, specifying water uses, water administration and pollution control. The CERC activities will be expected to abide by this Act and obtain necessary permits related to water use.

2.1.7 LESOTHO WATER AND SANITATION POLICY

The policy aims at making a clarion call to all sectors of the society to join hands in conserving and protecting this valuable resource, in order, to satisfy our present needs, as well as, those of future generation. Rangeland and management practices, wetlands conservation, controlling pollution and invasive alien species are all of particular importance. In summary, all these regulations and laws will be addressed and respected. According to the part A of the first schedule of the Environment act of 2008 and environmental impact assessment will be required if the proposed infrastructure is such that:

for the General conditions; a) Any activity out of character with its surroundings b) Any structure of a scale not in keeping with its surroundings. c) Major changes in land use for Urban and Rural Development.

Urban and Rural Development

a) Designation of new urban areas b) Establishment of industrial estates c) Establishment or expansion of recreational areas d) Establishment or expansion of recreational areas in mountainous areas, national parks and game reserves e) Rezoning f) Shopping centers and complexes 23 g) Hotels and tourist facilities h) Buildings with a total floor space of 500m2 or more i) Declaration of development areas j) Other infrastructure (both urban and rural).

2.1.8 LOCAL GOVERNMENT ACT NO. 6 OF 1997

The Act provides for the establishment of local authorities and for the purposes of local Government. Section 5 deals with the functions of the local authorities, which as contained in the First Schedule, list the relevant environmental protection considerations as follows:

- Control of natural resources and environmental protection;
- Public health pertaining to refuse collection and disposal.
- The local Government authorities are obliged by the provisions of this statute to oversee the handling and disposal of both solid and liquid waste from the construction sites. They approve and allocate sites for disposal of waste.

CERC projects will be implemented in line with the Local Government statutes and with Local Councils in areas of jurisdiction.

2.1.9 CHIEFTAIN SHIP ACT, 1968

A law providing for duties (to promote the welfare and interests and maintain public safety and order in the area of jurisdiction) of the office of chief, and associated administrative issues, including land and rangelands allocation. CERC projects activities will have to adhere to this Act including contractors and workers and ensure that public safety is assured during implementation.

2.1.10 HISTORICAL MONUMENTS, RELICS, FAUNA AND FLORA ACT OF 1967

The Act provides for the preservation and protection of natural and historical monuments, fauna and flora. It prohibits the destruction or removal of relics, monuments, fauna and flora. In line with the Act, TICP will ensure that proposed project ensure that preservation and protection of historical

monuments/relics, flora and fauna is assured through implementation of the ESMP and Chance Find Procedure Plans, and other safeguards instruments.

2.1.11 PUBLIC HEALTH ORDER NO. 12 OF 1970

Provides for among other things requirements for human dwellings and operating in healthy housing, including issues of sanitation as a measure for disease prevention. During the construction stage of the project, the CERC projects workers will be provided with toilets, and other basic hygiene equipment, as well as appropriate management of waste at construction sites. This is expected to meet the requirements of this statute and international health standards at the construction site.

2.1.12 FORESTRY ACT,1998

A law that repeals the Forest Act 1978 and provides for the sustained management of forests and forest reserves and the regulation and control of the utilization of forestry products. CERC projects will adhere to this regulation by avoiding construction activities in forest land

2.1.13 FOREST REGULATIONS 1980

Regulations that control deforestation, grazing, squatting and constructing buildings on forest lands. CERC projects will adhere to this regulation by avoiding construction activities in forest land

2.1.14 ROAD TRAFFIC ACT 1981

An act specifying, amongst others, procedures for the licensing of drivers and vehicles, rules for the utilization of roads, the use of non-motorable transport on public roads and the control of motor vehicle noise. Contractors and supervising engineers will abide by this Act with respect to workers and equipment.

2.1.15 HIV/AIDS PREVENTION (LABOUR CODE) 2006

The amendment of the Labour Code in 2006 to includes HIV/AIDS Prevention. Contractors will be required to alongside with their employees or their organizations, design and implement education programs aimed at HIV/AIDS prevention in workplace.

2.1.16 SEXUAL OFFENSES ACT 2003

An Act to make new provision about sexual offences, their prevention and the protection of children from harm from other sexual acts, and for connected purposes. The TICP will ensure that CERC projects contractors and staff abide to this Act and ensure that workers are aware, educated and sensitized on the consequences of committing sexual offenses.

2.1.1 CHILD PROTECTION AND WELFARE ACT 2011

Provides for protection of the rights and welfare of children, through elimination of child labour, protection of children and young persons from hazardous labour. CERCE projects will adhere to this Act specifically with respect to employment by ensuring that contractors do not engage in any form of child labour.

2.2 WORLD BANK'S SAFEGUARD POLICIES LIKELY TO BE TRIGGERED BY CERC PROJECTS

In order to reduce, minimise and mitigate adverse impacts and undue harm of its development projects to the environment, all World Bank-financed projects, that are approved prior to adoption of Environmental and Social Framework (ESF) in October 1, 2018 are guided by eleven (11) environmental and social policies and procedures commonly referred to as safeguards instruments[5]. Four (4) of these eleven (11) World Banks' safeguard policies have been triggered as a result of the CERC projects and summarised in table 2 below:

Table 2: Safeguard polices likely to be triggered under TICP

Safeguard Policies Triggered by TICP	Reasons for Triggers
Environmental Assessment (OP/BP 4.01) The objective of this policy is to ensure that Bank financed projects are environmentally sound and sustainable, and that decision-making is improved through appropriate analysis of actions and of their likely environmental impacts. This policy is triggered if a project is likely to have potential (adverse) environmental risks and impacts on its area of influence. OP 4.01 covers impacts on the natural environment (air, water and land); human health and safety; physical cultural resources; and transboundary and global environment concerns.	The Project activities– rehabilitation and maintenance of secondary roads–will generate construction related environmental and social risks that are site-specific (within the existing alignment), reversible, and can be mitigated by known measures. Overall, the project will generate long term social and environmental impacts. The project is, therefore, classified as an Environmental Risk Category B.
Natural Habitats (OP/BP 4.04) This policy recognizes that the conservation of	The ESMF provides guidance on screening and mitigation measures to ensure that road

[5] https://www.worldbank.org/en/projects-operations/environmental-and-social-policies

natural habitats is essential to safeguard their unique biodiversity and to maintain environmental services and products for human society and for long-term sustainable development. The Bank therefore supports the protection, management, and restoration of natural habitats in its project financing, as well as policy dialogue and economic and sector work. The Bank supports, and expects borrowers to apply, a precautionary approach to natural resource management to ensure opportunities for environmentally sustainable development. Natural habitats are land and water areas where most of the original native plant and animal species are still present. Natural habitats comprise many types of terrestrial, freshwater, coastal, and marine ecosystems. They include areas lightly modified by human activities, but retaining their ecological functions and most native species. This bank policy prohibits financing for developments that would significantly convert or degrade critical natural habitats, and preference is on siting projects on already converted land.	rehabilitation and maintenance does not alter or cause destruction of any critical or sensitive natural habitats especially wetlands. The preliminary baseline assessment carried out during the preparation of the project, confirmed that the existing wetlands in Lesotho occupy a relatively small footprint and are not classified as critical or sensitive ecosystems. The Lesotho Roads Directorate confirmed that engineering methods such as the use of gabions, etc. are normally applied by contractors to mitigate against destruction of wetlands during construction of roads and ensure the effective functioning of the hydrological system. The environmental risk for OP 4.04 is therefore minimal and should there be a chance of encountering a wetland during the maintenance of roads, and bridges, the risk is manageable through the application of known mitigation measures included in the ESMF.
Physical Cultural Resources (OP/BP 4.11) The objective of this policy is to assist countries to avoid or mitigate adverse impacts of development projects on physical cultural resources. For purposes of this policy, "physical cultural resources" are defined as movable or immovable objects, sites, structures, groups of structures, natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Physical cultural resources may be located in urban or rural settings, and may be above ground, underground, or underwater. The	Investments may involve excavation activities which can lead to impacts on physical and cultural resources. However, the risk is minimal as the works will be carried out on existing roads infrastructures. The mitigation measures included in the ESMP will be adequate to mitigate adverse impacts on physical cultural resources, and outlines provisions for managing chance finds (Annex 10.4).

cultural interest may be at the local, provincial or national level, or within the international community.	
Involuntary Resettlement (OP/BP 4.12) The objective of this policy is to (i) avoid or minimize involuntary resettlement where feasible, exploring all viable alternative project designs; (ii) assist displaced persons in improving their former living standards, income earning capacity, and production levels, or at least in restoring them; (iii) encourage community participation in planning and implementing resettlement; and (iv) provide assistance to affected people regardless of the legality of land tenure.	A RPF has been prepared for the TICP project to provide procedures for assessing impact, as the project locations were unknown. However, CERC LAP is being prepared, guided by the RPF to address projects specific land acquisition impacts since the project location are known. The civil works associated with road rehabilitation and maintenance is on existing roads, already allocated to public, non-productive use. The work may induce limited land acquisition in the form of strips of land in the right of way, which will include rocks, grass, trees and farmland. No physical displacement of households is expected.

2.3 WORLD BANK GROUP EHS GUIDELINES

The Environmental Health and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). The EHS Guidelines contain the performance levels and measures that are normally acceptable to the WB Group, and that are generally considered to be achievable in new facilities at reasonable costs by existing technology.

All sub projects under requiring ESIA/ESMP will as a mandatory requirement make reference to the applicable guideline(s) and construction contractors and supervising engineers will be required to adhere to these guidelines which will be included in their contractual agreements with TICP[6].

[6] www.ifc.org/ehsguidelines

2.4 ESF/SAFEGUARDS INTERIM NOTE: COVID-19 CONSIDERATIONS IN CONSTRUCTION/CIVIL WORKS PROJECTS[7]

The COVID-19 pandemic presents Governments with unprecedented challenges. Addressing COVID-19 related issues in both existing and new operations starts with recognizing that this is not business as usual and that circumstances require a highly adaptive responsive management design to avoid, minimize and manage what may be a rapidly evolving situation due to prevailing COVID -19. This interim note is intended to provide guidance to teams on how to support Borrowers in addressing key issues associated with COVID-19, and consolidates the advice that has already been provided over the past month. As such, it should be used together with the COVID-19 method statement in annex 10.5.

It further emphasizes the importance of careful scenario planning, clear procedures and protocols, management systems, effective communication and coordination, and the need for high levels of responsiveness in a changing environment. It recommends assessing the current situation of the project, putting in place mitigation measures to avoid or minimize the chance of infection, and planning what to do if either project workers become infected or the work force includes workers from proximate communities affected by COVID-19. Borrowers should understand the obligations that contractors have under their existing contracts, require contractors to put in place appropriate organizational structures, and develop procedures to address different aspects of COVID-19 (Annex 10.9)

2.5 INTERNATIONAL, POLICIES, LEGAL REQUIREMENTS

2.5.1 FIDIC HIV AND AIDS GUIDELINES

FIDIC Policy on HIV/AIDS in the construction sector recommends the following at construction sites: Raising awareness about HIV/AIDS, Increased understanding about the disease, through dissemination of information and by generating discussion, ensuring that construction workers have access to condoms, HIV counselling, testing and referral services, Sexually Transmitted Infection (STI) diagnosis and treatment, Monitoring of outcomes. FIDIC also recommends provision of clauses addressing HIV/AIDS in construction contracts. The communities affected by the project are to be included in the HIV and AIDS awareness, counselling and all related activities. In addition to the policy provision the Department of Environment facilitated a UN sponsored workshop of environmentalists on mainstreaming HIV/AIDS and gender in the preparation of EIAs on 31st October

[7]

to 2nd November 2012. This initiative was in recognition by the GOL that HIV/AIDS a pandemic and that project construction sites are vulnerable locations. It was also conducted in observance of the Maseru Declaration & Commitment to AIDS in the SADC region (2003). The workshop's resolution was that HIV/AIDS must be incorporated in the future preparation of EIAs. Lesotho has also ratified the following international conventions and protocols that have relevance to conservation of biodiversity and nature and natural resources.

2.5.2 CONVENTION ON BIOLOGICAL DIVERSITY 1992

The objectives of this Convention —are the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources. The Convention requires States to adopt measures for the recovery and rehabilitation of threatened species and for their reintroduction into their natural habitats under appropriate conditions.

2.5.3 UNITED NATIONS CONVENTION TO COMBAT DESERTIFICATION IN THOSE COUNTRIES

Experiencing serious drought and/or desertification, particularly in Africa, 1994 the Convention emphasizes the prevention of land degradation that may among other initiatives include the rehabilitation of degraded lands that are caused by human actions such as construction activities in development projects. Clearing and grubbing may cause land degradation.

2.5.4 PROTOCOL TO PREVENT SUPPRESSION AND PUNISH, HUMAN TRAFFICKING IN PERSONS

This protocol is intended to prevent and combat human trafficking crime and facilitate international cooperation against it, especially women and children. It emphasizes the need for an appropriate balance between crime control measures and measures to support or protect victims of trafficking. Its inclusion in the ESMP is to bring awareness to the contractors and communities that crimes described as trafficking are prohibited.

2.5.5 REVISED AFRICAN CONVENTION ON CONSERVATION OF NATURE AND NATURAL RESOURCES

This protocol desires for the achievement of ecologically rational, economically sound and socially acceptable development interventions. It is believed that in order to achieve sustainable development, environmental protection shall constitute an integral part of the process and cannot be considered in isolation from it.

2.5.6 SADC PROTOCOL ON WILDLIFE CONSERVATION AND LAW ENFORCEMENT

The main objective of this protocol is to establish common approaches to the conservation and sustainable use of wildlife resources and to assist with the effective enforcement of laws governing those resources. Its appropriateness is drawn from the concept of capacity building for effective wildlife management, especially at grassroots level. It values information sharing during public consultations regarding the matter of equipping the stakeholders on law enforcement against killing and taking of wildlife products.

3 ENVIRONMENTAL AND SOCIAL BASELINE AND SCOPE OF WORKS

The objective of this ESMP is to mitigate the adverse impacts of the project from the planning to implementation phase. It is therefore in response to this that tables below details environmental and social baseline, and proposed scope of works for the 10 selected projects sites, that guide the proposal of appropriate mitigation measures and responsibilities for implementation of the ESMP.

3.1 MAZENOD AU ROAD (HA JIMISI CROSSING)

The crossing is approximately 2kms from the Junction of A2 and A3 in Mazenod running in a westerly direction crossing the Machekoaneng River wherein it turns in a south westerly direction through Jimisi Village turning in a north westerly direction to Ha Au, in Maseru district. The road is approximately 7.69 km. There were two original crossing structures on the Machekoaneng River, two vented ford structure which have been undermined on both the approaches as the embankments were not protected and in so undermining the structure left the entire road has been cut-off (Photo 1). There is drift on the road which are still in good condition (Photo 2).

The Catchment of the Machekoaneng River is more than 25.5km² which therefore result in significant discharge in normal floods, however due to its large area it was washed away in the results floods that occurred throughout Lesotho. Currently the location of the crossing is within the collapsible and erodible soils that will require protection of the embankments as well as river draining works using gabion mattress for an approximate 30m upstream of the crossing and 10m downstream.

Photo 1: Vented ford structure 1 crossing at Machekoaneng River

Photo 2: Vented ford structure 1 crossing at Machekoaneng River

3.1.1 SCOPE OF WORKS

The scope of works for maintenance of a 2.0km road of Masenod – Au road include:

- Provision of a temporary culvert crossing for vehicles and pedestrians or dump rip rap for temporary crossing;
- Realignment of the river stream such that the inlet and outlet are at right angles to the direction of flow;
- Construct Mini bridge to serve the two approach roads.

3.2 MAHLOENYENG HA KHITIONE ROAD (TLAMETLU RIVER CROSSING)

The Mahloenyeng Ha Khitione Road starts on the junction with B23 (Ha Moruthoane-Matsieng-Morija) Road at Mahloenyeng in a northerly direction crossing the Tlametlu River at approximately 3kms up to the Junction with B32 (Mahlabetheng to Tikoe Circle on Koffi Annan Road). The crossing on Tlametlu River is approximately 2-3 kms from Mahloennyeng. The road is located in Maseru district, is approximately, 9.3 kms. The road has recently been re-gravelled by Ministry of Local Government and it is good shape, however the road side drains are in adequate and will therefore require to be improved.

During rainy seasons the villages of Mauteng and Mahloenyeng do not have access to each other hence this creates an impediment, as commodities cannot be easily transported. The river is currently being crossed as it is using 4x4 vehicles and tractors is currently in poor conditions since it has not been maintained in many years, resulting in erosions of the road and river banks (Photo 3). The January heavy rains worsened the crossing conditions leading to difficulty in crossing during rainy seasons (Photo 4).

Mahloenyeng Structure is very important to the communities of Ha Gideone, Mauteng ang Mahloenyeng and other villages beyond and its construction will tremendously improve the socio-economic growth within the area and the much-needed service delivery amongst the people in these areas.

Photo 3: River Bank on meandering section of the River being eroded which will eventually result in road being compromised

Photo 4: Temporary crossing constructed from Dump Rip Rap

3.2.1 SCOPE OF WORKS

The Works shall comprise of construction of river crossing structure crossing the Tlametlu River along the C233 Mahloenyeng – Gideone Road (9.8Km) near Mahloenyeng village. The scope shall include but not limited to the following activities: -

- Construction of a river crossing structure
- Stone pitching side drains at 10% or greater slopes where needed
- Construction and maintenance of diversion route
- Demolition of the existing structure
- Execution of erosion protection works
- Execution of minor landscaping works where needed.
- Removal of diversion route after completion of the bridge
- Installation of road furniture where needed

3.3 LEPHOI LIKAMORENG ROAD

The road starts at the junction with C304 at Ha Lephoi in an easterly direction to Likamoreng, in Thaba-Tseka district. The length of the road is approximately 5.46 km. The road has excessive potholes due to the fact that the grade of the road is approximately 0.1% with water stagnating within the road, and there is also a damaged vented ford at one point of the road (Photo 5). The result of the ponding has weakened the subgrade with sections of the road rutting and while in other sections of the road there is a lot of gravel loss. It will therefore be prudent that where grades of the road are less than 1%, innovative subsurface drains be constructed to drain water away from the road and the cost effective solution is a trench 2.0m deep and 1.0m wide filled with rocks maximum 500mm diameter or less to allow water to seep into the trench.

Photo 5: Damaged vented ford crossing filled with rocks and lined with concrete reinforced with mesh as a slab with stone masonry walls

3.3.1 SCOPE OF WORKS

The scope of works for Lephoi – Likamoreng road will include:

- Construction of Dump Rip Rap culvert in place for temporary crossing;
- Construction of sub-surface drains as recommended, carryout spot gravelling, improve vertical alignment at crossing to fit the recommended low level bridge; and
- Construction of low level bridge, and the constructed structure should take into consideration the energy the stream.

3.4 HA MATEKA PULANE ROAD

The total length of the road is 6.9kms, however the last 300m of the road does not serve any communities rather is a stretch that leads to agricultural lands. The first 400m of the road from Ha

Mateka is on a steep 20 incline with basalt outcrop where gravel washes off after every rainfall, this steep incline is followed by 200m of all flattest slope where potholes are developing as drainage is a problem as water ponds on the road creating potholes, the next 300m of the road has shallow grade and also poses drainage and blocked vented ford problems (Photo 6). The road then runs along a contour for almost 500m and at chainage 1+100 there is a culvert that is fully silted and a drift at chainage 1+200 that is still intact.

The majority of gravel for this road is sourced at a borrow pit that is located at chainage 1+300. The road then runs down from chainage 1+400 to 1+900 and gravel is almost washed off in the section from 1+400 to 1+900 as the road is on basalt rock which easily washes off every time it rains. The road transgresses into the sandstone from the basalt at chainage 2+100 and for the next 700m there is a further gravel loss as the road subgrade is the sandstone.

Photo 6: Substandard vented ford crossing with blocked culverts, gravel loss and vented ford not constructed to Roads Directorate Standard

3.4.1 SCOPE OF WORKS

The reinstatement activities at Ha Mateka – Pulane Road will include:

- Construction of side drain to improve drainage;
- Carryout spot re-gravelling improve vertical alignment at crossing to fit the recommended vented ford; further undertake protection works at vented ford as well as gully protections; and
- Construction of Vented Ford at two locations.

3.5 SILOE LIKHOELE ROAD

The road starts as Siloe and runs in a north easterly direction through Ha Moletsane crossing the Likhetlane River through Ha Mohohlo to junction with B26 near Kekeleng crosses Qhoqhoane River past Ha Mahloli turning in a north westerly direction to Likhoele. The road traverses the Molteno and Elliot formation and during recent floods the roads side drains have been clogged resulting in the road surface being compromised thus there is a need for spot gravelling of the entire road as the road crosses two rivers namely Likhetlane and Qhoqhoane, the recent floods have washed away two vented fords which were founded on sandstone and based on the fact that the river crossings are in sandstone which has remained intact even after the rains, the vented fords should be demolished (Photo 7 & Photo 8).

Photo 7: Vented fords crossing 1 undermined by floods

Photo 8: Vented fords crossing 2 undermined by floods

3.5.1 SCOPE OF WORKS

The scope of work for Siloe – Likhoele road include the Design and Construction of a Mini Bridge as per the Hydrology Design suitable for Class B Road on two locations crossing the Likhetlane and Qhoqhoane River.

3.6 MOUNT MOOROSI MAKOAE ROAD

The road starts at the junction with A4 near Mount Moorosi running in a north easterly direction past junction with road D4401 to Quthing River turning in an easterly direction along Quthing River past the C441 road junction through Ha Moleleki to Ha Ntemere turning in a south easterly direction running along the Quthing River to Ha Makaoe.

The road traverses the Elliot and Molteno formation which comprises the sandstone, mudrock and shales and in this formation the slopes on a road are usually susceptible to mudslides and block failures as well as erosion resulting from high velocity of the water flowing through earth side drains which will in most cases need protection in the form of silt traps and gabions to protect edges of the road and invariable gabion matrasses for lined side drains which have been more effective than stone pitched side drains as usually stone pitched side drains are undermined on the first floods.

The road runs along the Quthing River and at Ha Masiu the road has been cut off by the river and access around this area is through people's fields (Photo 9), the river has with time been able to erode the embankment until in the recent floods able to cut off the road (Photo 10).

Photo 9: B44 road cut off at Ha Masiu as river meandered Community fields being used as temporary deviation

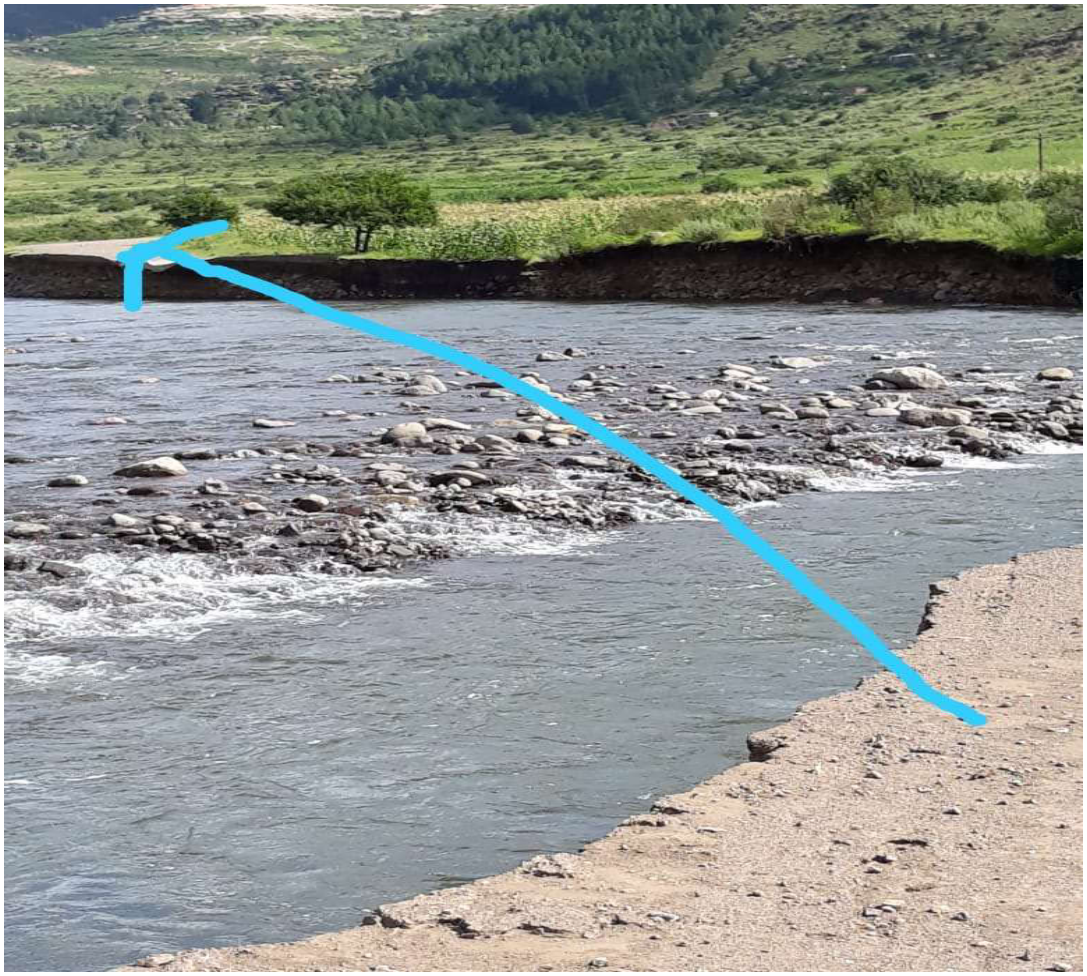


Photo 10: Road cut off and location for protection works

3.6.1 SCOPE OF WORKS

The works shall comprise:

- Spot improvement along the B44 road from Mount Moorosi to Ha Masiu to enable reconstruction works at Ha Masiu. Spot improvement works may include spot gravelling, drainage improvements, structures repairs, culvert desilting or installation, gabion protection works etc;
- Reconstruction of the eroded section of road at Ha Masiu. Associated works may include protection of the reconstructed road from future scouring, river protection works;
- Spot improvement of B44 road from Ha Masiu to Mphaki to enable access to site at Ha Masiu and to improve road conditions and restore a continuous access between Mphaki and Mount Moorosi. Spot improvement works may include spot gravelling, drainage

improvements, structures repairs, culvert desilting or installation, gabion protection works etc.

3.7 SEAKA KETANE ROAD

The road starts at the Junction with A2 Main South Road at Seaka junction, approximately 100-150m from Seaka Bridge and runs in a north easterly direction along the Senqu River through Likhakeng crossing the Mokhopho River through to Ha Chola, extending through Ha Lephoi and Fika la tsoene to Lithipeng turning in a northerly direction past Marakong to Anone turning in an easterly direction past Shalane, crossing the Liphiring River through Ha Lethena and Ha Makhabane, turning in a northerly direction to Ha Putsoane, turning in a north easterly direction through Qacha and Ma Malephane to junction at Phamong a total distance of 57.84 kilometres. The road meanders through a number of villages for about 115 km.

The overall condition of the road is poor. Mudslide, silted culverts, erosion and poor road condition, streams with high velocity have blocked vented ford (Photo 11), Road undermined and half the road has formed a deep gully (Photo 12), 2x half 1.5φ Armco Pipes, storm water runoff crossing the road washed away (Photo 13), Drift damaged and beyond repair (Photo 14).

Photo 11: Mini Bridges blockage from debris on upstream side while openings not blocked on the downstream side on Basalt

Photo 12: Silt trap poorly designed in terms of spacing resulting in undermining of the silt traps and compromising the road andcut faces resulting in deep gully formation

Photo 13: Silted 600 diameter pipe and overtoppingplate

Photo 14: Scouring of road due to lack of outlet protection, blockage of debris and loss of Armco Formation

3.7.1 SCOPE OF WORKS

The Works shall comprise of spot improvement, reconstruction/ repairs of crossing approaches and culverts along Seaka to Phamong road (57.8km). The scope shall include but not limited to the following activities: -

- Maintain the junction at the beginning and end of the road (Seaka junction and Ketane);
- Repair of potholes at some critical portions of the road;
- Replacement of damaged culverts;
- Cleaning Side Drains at some critical portions of the road;
- Clearing out and desilting drainage Structures;
- Stone pitching side drains at 10% or greater slopes;
- Removal of diversion route after completion of the bridge;
- Improvement of junctions;
- Demolition of the existing bridge;
- Re-construct/repair damaged structures;
- Execution of erosion protection works;
- Execution of minor landscaping works where needed.

3.8 SELOMO TSIME ROADE

The road starts at Ha Selomo village and runs in a north easterly direction for approximately 3kms wherein it turns in a south easterly direction along the Linakeng River through Ha Mothuntsane to Tamaseka where in tuning in a northerly direction crossing the Linakeng River to a junction near Tsime, and runs a total distance of approximately 18.38kms.

The first 600m of the road has excessive potholes due to the fact that the grade of the road is approximately 0.1% with water stagnating within the road. The next 1300m of the road has no

potholes with good gravel cover but at chainage 1+900 there is a sandstone outcrop with a lot of gravel loss (Photo 16).

Generally, various sections of road have lost gravel and the road is now an earth road (Photo 15, Photo 16 & Photo 17). There is also a vented ford with inlet control problem, however the outlet has no drainage or scour problems (Photo 18). Erosion of side drains on various locations on this road have compromised the width of the road and the beginning of a big gully and road cut off, resulting in members of the community taking action to repair the road themselves (Photo 19). Majority of the vented ford structures and drifts are founded on solid rock with minimal scouring on both the upstream and downstream end. Though a sandstone masonry walls have been constructed to control stormwater, due to lack of maintenance a gully has formed on the roadside of masonry walls.

Photo 15: minimal grade resulting in potholing due to insufficient drainage

Photo 16: Gravel loss between 1+900 and 5+000

Photo 17: Gravel loss on sandstone outcrop

Photo 18: Stream meandering and culverts blocked as a result of meandering

Photo 19: River course during floods and section where road was cut off, and Community Engagement in road reinstatement

3.8.1 SCOPE OF WORKS

The key emergency maintenance activities at Selomo – Tsime road are construction of vented ford and spot improvement works which include but not limited to:

- Correct outlet protection of vented ford;
- Open stream channel on the upstream side such the 3 culverts can fully function;
- Re-gravelling of road sections and building of masonry walls;
- Erosion protection on the downstream side of the road;

3.9 LENKOANE NKHAHLE ROAD

The section of road that traverses the basalt formation for the entire length and the subgrade on the road is gravel with a few areas where black cotton soils exist especially at stream crossings. Limited routine maintenance has resulted in part of the road growing grass and clearing, a damaged side drains. All crossings on this road are on solid rock and the is a drift/vented ford, and the up streams have high carrying capacity of debris and the high velocity of flow which flush any vented ford or drift that is constructed. The structure on this road do not have proper inlet and outlet control as a result the embankments are undermined. The headwalls on the outlet are constructed to retain approach fills and are founded on rock without any dowelling seepage flow undermined the foundations of the headwalls which in turn undermined the structures completely on all structures that have been washed away (Photo 20).

Photo 20: Headwall constructed on solid rock without any rock dowels for anchor

3.9.1 SCOPE OF WORKS

The scope of work for the Lenkoane – Nkhahle road include:

- Demolishment of the inadequate two vented ford bridges;
- Construct two low level bridge to replace the demolished bridges.

3.10 BOBOJANE TSEREOANE ROAD

The road starts at the junction with A1 at Ha Foso, in Berea District, in a north westerly direction to a junction at Lipoping, turning in a northerly direction to Ha Jubilee then turning in a north easterly direction through Ha Makebe crossing the Seqonoka River at Tsereoane.

The road has been severely eroded on approximately 1.5kms which requires gravelling while there are slope failures on the road which require slope protection and silt traps as gullies are beginning to form where erodible soils exist; it is therefore necessary to rectify the slope failures using gabions for protection of the slopes and reinstating of the gullies and in other areas providing silt traps and undertake re-gravelling where there is gravel loss.

3.10.1 SCOPE OF WORKS

The maintenance works at Bobojane – Tsereoane road include:

- Re-gravelling of a 1.5 kilometre road surface;
- Construction of slope protection, silt traps and gullies forming that require to be reinstated.

4 ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATIONS

4.1 SUMMARY OF ENVIRONMENTAL AND SOCIAL (E&S) IMPACTS

Implementation of the activities will be positive and urgently needed. The proposed civil works and other related sub-activities are small and medium-scale works and provision of essential goods. The potential negative impacts are expected to be moderate, localized, and temporary that can be mitigated through the implementation of the existing safeguards instruments of the Project and close supervision by the project manager and E & S compliance monitoring by the Environmental and Social Safeguards Specialist. The required mitigation measures are included 4.2 of the Environment and Social Management Plan (ESMP).

In terms of social impacts, activities that will result in the involuntary taking of land, relocation of households, loss of assets or access to assets that leads to loss of income sources or other means of livelihoods, and interference with households' use of land and livelihoods will not be supported. Therefore, every effort should be made to eliminate activities that may result in such impact, and those that may result in the aforementioned impacts will not be implemented.

In addition, workers contracted to conduct civil or other works for contingency activities, will have to sign a worker's code of conduct (Annex 10.7), which covers issues such as preventing gender based violence, as well as sexual exploitation and abuse. The services of the GBV/HIV consultant (LENASO) will be maintained. In addition, construction works or uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor are prohibited. Moreover, the parent project's GRM procedures apply. However, there is no independent worker's GRM for the project, workers utilize the common GRM in place.

The implementing agencies will follow the ongoing citizen engagement and stakeholder consultation procedures of the parent project. Training, communication and public-awareness activities follow COVID 19 protocols and include special provisions to ensure that they meet requirements established at the project's safeguards instruments and the guidance from Risk communication and community engagement (RCCE) readiness and response to the 2019 novel coronavirus (2019-nCoV) (Annex 10.5).

Section 4.2 below identifies potential impacts of the proposed activities/subprojects. Due consideration will be given to ensure compliance with the WB's Environmental, Health and Safety (EHS) Guidelines (General and Specific)[8].

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

4.2 ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

Table 2: Potential impacts of the proposed activities to be carried out under CERC projects

A.	B. ENVIRONEMTNAL IMPACTS AND MITIGATION MEASURES					
No	**Subprojects/Activities (nationwide)**	**Potential Environmental and Social impacts/risks**	**Expected Significance**	**Mitigation Measures[9]**	**Performance Indicators**	**Responsibility**
1	Repair of damaged roads and bridges infrastructure	Increase dust, noise, soil erosion, loss of vegetation, water pollution from sediments, waste oils/fuels that may negatively impact aquatic fauna.	Moderate	• Use appropriate PPE for dust, noise, and handling of hazardous materials, and equipment; • Dust and noise nuisance shall be controlled to prevent nuisance in construction workers and neighboring communities; • Implementation of erosion control measures (e.g.	• Appropriate PPE used • No dust • Noise controlled • Erosion controls in place • No water/soil pollutions	Contractor

[9] The hierarchy of control will be follow-up for effective control of risks and impacts, i.e. reducing the risk through substitution, isolation and engineering controls, then reducing the risk through administrative controls, and the use of protective personal equipment (PPE) to be employed as the last control measure.

				retaining walls); • No clearance of sites prior to approval and surveys; • Proper management of sediment (e.g. sediment screens); • Proper management of machine/vehicle waste fuels (spill controls measures); • Rehabilitation of sites at the end of the construction works.	• No oils/fuels spill on bare soils and water	
		Toxic wastes such as machinery/vehicle waste oil/fuels, and solid construction waste that may result in public and occupational health and safety risks, and environmental pollutions.	Moderate	• Waste should be appropriately segregated; • Waste bins should be appropriately installed at appropriate locations within the construction site (e.g. at toilets, storage areas, entry and exit areas, etc.); • Fuelling of equipment, such as diesel generators, brush cutters and concrete mixers shall be done on a	• Waste properly managed • No environmental pollutions	

				plastic liner or above drip trays in order to contain any fuel spillages; • Waste should be properly managed and disposed at designated areas, approved by local authority (no dumping of waste in rivers, or dongas or gullies);		
		Land acquisition and impacts vulnerable groups including women, disabled, elderly youth etc.	Minimal	• Permanent land acquisitions will be avoided for the CERC activities as much as possible; • Where there are land takes, compensations will be paid prior to start of construction works.	• No permanent land acquisitions; • Land compensations paid prior to construction works	Contractor / RD
		Blocking of river flow	Moderate	• The flow of the river shall not be restricted during construction and under no circumstances shall the stream be blocked.	No blocking of river flow	Contractor
		Washing of clothes or vehicles or machinery in	Minimal	• No washing of clothes or vehicles/or machinery shall	No washing of clothes, vehicles, or	Contractor

		the river		be permitted in the rivers.	machinery in rivers	
		Borrow pits and sand quarrying	Moderate	• Wherever possible, existing sources of supply shall be used to provide materials for concrete; • Where new borrow pits are required, all necessary authorizations shall be obtained prior to opening of the area; • Any excavation of sand from the river shall be authorized by the local authority prior to the start of the activity. • All borrow pits shall be rehabilitated after use, including battering and shaping, top soiling and re-vegetation.	• Local existing materials source used • All borrow pits and sand quarrying authorized • All borrow pits and excavations rehabilitated after use	Contractor
2	Removal and disposal of debris associated construction works. Clearance of debris	• Occupation health and safety risks such as injuries due to improper use of tools, and use of PPE;	Moderate	• Use appropriate PPE for dust, noise, and handling of hazardous materials, and equipment; • First aid kit should be	• No construction related injuries • Appropriate PPE used • Tools and	Contractor

	from roadways, such as vegetation, large trees or tree members, construction debris (from work sites or from structures demolished during the construction process), abandoned vehicles, etc.	• Generation of waste, and loss of vegetation, and potential soil erosions;		available at work site; • Waste bins should be appropriately installed at construction site, and temporary waste storage sites should be identified, and projected. • Waste should be properly managed and disposed at designation areas, approved by local authority; • No clearance of sites vegetation or trees prior to approval and surveys by RD;	machinery properly used as per operation manuals • First aid kit in place • Waste properly managed • No clearance of vegetation without approvals by RD	
3	Spot Improvement Activities: • Re-Construction of stone / gabion retaining walls; • Filling of erosion/gullies on road way; • Reinstating	Increase dust, noise, soil erosion, loss of vegetation, water pollution from sediments, waste oils/fuels that may negatively impact aquatic fauna.	Moderate	• Use appropriate PPE for dust, noise, and handling of hazardous materials, and equipment; • Dust and noise nuisance shall be controlled to prevent nuisance in construction workers and neighboring communities; • Implementation of erosion control measures (e.g.	• No dust • Noise controlled • No soil and water pollutions • No oils/fuels spill on bare soils and water • Erosion	Contractor

	approaches to drainage structures; • Unblocking culvert and vented ford barrels; • Reinstating washed away/eroded embankments; • Re-building destroyed/damaged drifts; • Repair damages to drainage structures;			retaining walls); • No clearance of sites vegetation or trees prior to approval and surveys by RD; • Proper management of sediment (e.g. sediment screens); • Proper management of machine/vehicle waste fuels (spill controls measures); • Rehabilitation of sites at the end of the construction works. • Work site should be properly demarcated, and safety signs installed in Sesotho or English.	controls in place • Excavations and borrow pits rehabilitated after use • Site properly demarcated • Safety signage installed	
		Toxic wastes such as machinery/vehicle waste oil/fuels, and solid construction waste that may result in public and	Moderate	• Waste should be appropriately segregated; • Waste bins should be appropriately installed at appropriate locations within the construction site (e.g. at toilets, storage	Waste properly managed	Contractor

		occupational health and safety risks.		areas, entry and exit areas, etc.); • Waste should be properly managed and disposed at designated areas, approved by local authority (no dumping of waste in rivers, or dongas or gullies);		
4	Roads resurfacing with gravel, geometry, side drains, vegetation removal, potholes filling and minor cross road structure installations.	Increase dust, noise, soil erosion, and loss of vegetation;	Moderate	• Use appropriate PPE for dust, noise, and handling of hazardous materials, and equipment; • No clearance of sites prior to approval and surveys;	• No dust • Noise controlled • No soil or water pollutions • No clearance of vegetation or trees without approvals by RD	Contractor
		Occupation health and safety risks such as injuries due to improper use of tools, and use of PPE;	Moderate	• Use of appropriate PPE, and tools' user manuals. • First aid kit should be available at work site.	• Appropriate PPE used • First aid kit in place	Contractor

		Dig into archeological objects;	Minimal	Implementation of Chance Finds Procedures (Annex 10.4)	Chance find procedures applied	Contractor
5	Sanitation	Infections, and disease transmissions	Moderate	Supply of adequate hygiene equipment such as toilets, tippy taps, sanitizing stations, masks, hand washing with soap, etc.	Appropriate hygiene equipment in place	Contractor
C.	**D. SOCIAL IMPACTS AND MITIGATION MEASURES**					
No	**Subprojects/Activities (nationwide)**	**Potential ES impact issues (risks)**	**Expected Significance**	**Mitigation Measures[10]**		**Responsibility**
1	All maintenance and rehabilitation works	Risk of Gender-Based Violence (GBV), Sexual Exploitation and Abuse/Harassment (SEA/H), and Child labour engagements by Contractors	Moderate	• Contractor should ensure compliance with national labour law, and relevant national legislation with respect to GBV/SEAH. • Sensitize workers and communities on GBV and Child labor. • Contract workers should	• No GBV/SEAH incidences • No child labor	Contractor, and LENASO

[10] The hierarchy of control will be follow-up for effective control of risks and impacts, i.e. reducing the risk through substitution, isolation and engineering controls, then reducing the risk through administrative controls, and the use of protective personal equipment (PPE) to be employed as the last control measure.

				sign and follow the individual code of conduct (annex 10.7)		
		Increased exposure to COVID-19 infections at workplace due to workers or inspectors coming from COVID-19 high risk areas.	Moderate	Sensitize workers and communities on COVID-19 protocols, and implement METHOD STATEMENT FOR MANAGEMENT OF COVID 19 ON CONSTRUCTION SITES (Annex 10.5)	• No COVID-19 transmissions • COVID1-19 method statement used • Workers sensitized on COVID-19	Contractor
		Increased exposure to other transmitted diseases, such as TB, HIV/AIDs, etc.,	Minimal	Sensitize workers and communities on protective measures such as opening of windows when in congested rooms, and use of condoms when engaging in sexual activities;	• No TB, HIV/AIDs transmissions • Workers sensitized on TB and HIV/AIDs	Contractor
		Conflicts or complaints by local community due to hiring process by	Moderate	Contractor should consider transparent hiring process with the engagement of the local	• No conflicts due to hiring processes • Project GRM	Contractor

		Contractors		counsellors, local chiefs, RD, and TICP as much as possible. The project grievance redress mechanism should be applied for management of all project related grievances (Section 8, Subsection 8.3).	procedures followed	
		Temporary disruption of social activities, and blocking of ways to other services due to ongoing construction works.	Moderate	Prior planning of construction activities shall be done early with engagement of local leaderships, and information be shared with affected persons.	No disruption of social activities	Contractor
		Theft of construction materials, equipment, and machinery.	Moderate	Security fencing, security personnel or any other form of security measures should be provided for protection of construction materials, equipment, machinery tools, with appropriate warning signs in Sesotho or English	• Construction site properly secured • No theft of materials, equipment or machinery	Contractor

		Trespassing	Moderate	• Site should be secured fenced, demarcated with safety signs installed, in Sesotho or English. • Personnel shall not trespass outside of the project working areas and shall take special care to avoid farming of livestock on project areas.	No an authorized trespassing on construction site	Contractor
		Fire hazard	Moderate	• No open fires shall be permitted outside of the work areas; • Adequate firefighting equipment should be installed at construction site (e.g. fire extinguisher)	• No open fires on construction site • Firefighting equipment in place	Contractor

5 INSTITUTIONAL ARRAGEMETN FOR ESMP IMPLEMENTATION

In order to ensure that the safeguards are implemented at project level, the Roads Directorate (RD) which implements construction on behalf of GoL will make contractual agreements with construction companies that are to implement the CERC activities. In the contracts, the companies will commit to execute construction in an environmentally sustainable manner and sensitive to social issues as per the requirements of the ESMP as outlined in the tender documents. The contractors will engage Environmental Site Agents (ESA) who will be responsible for the implementation of the ESMP requirements on daily basis during construction period.

In addition, RD should engage a Project Supervision Consultant (PSC), who will supervise all the 10 CERC projects under direct supervision of the Component 1 & 4 Project Manager (PM) who shall be responsible for oversight of the 10 subprojects (Table 2) and project progress reporting on E&S aspects of the project, working closely with TICP Environment and Social Safeguards Specialist. The key personnel of the PSC will be resident engineer, and environment and social specialist. RD will send a Project Engineer and a Technician on-site at least once a month and at least twice a week respectively. These officers will work hand-in-hand with the ESAs to take care of Health and Safety requirements during project implementation. RD also has Environment and Safety Manager, and a Sociologist based in Maseru, responsible for RD World Bank funded projects, who will be responsible for coordinating a Consultant for implementation of social and environmental safeguards requirements of the project.

RD has also engaged Lesotho Network of AIDS Service Organization (LENASO) for implementation of social related activities such as GBV/SEAH, and HIV/AID sensitization and awareness raising activities under the parent project. LENASO is a Network of Community Based Organizations (CBOs) and support groups supporting the Ministry of Health (MOH) to implement Primary Health Care activities, TB, HIV and AIDS services at the grassroots in the communities of Lesotho. The contract of LENASO has been extended to support CERC projects . GBV/SEAH, and HIV/AIDs awareness raising activities are ongoing for contractors, communities, and CLOs (Annex 10.6).

Moreover, the Transport Infrastructure Connectivity Project – Project Implementing Unit (TICP-PIU) has engaged an Environment and Social Safeguards Specialist (ESSS) who is responsible for developing and overseeing environmental and social policies and procedures, as well as reviewing and appraising the project for compliance with environmental and social requirements. The specialist is expected to visit each project site once a month as part of monitoring. In an effort to

improve monitoring efficiency, TICP-PIU shall also engage Community Liaison Officers (PIU-CLOs) for each CERC project who will be on-site on the daily basis to monitor project compliance with the ESMF, ESMP RPF, and LAP requirements. These officers are to facilitate a good relationship between the project and host communities through implementation of Grievance Redress Mechanism (GRM) for timeous and effective dispute resolution.

To enhance monitoring, three monitoring instruments have been developed namely Weekly Environmental and Social Monitoring Sheet, Monthly ESMP Compliance Monitoring and Evaluation Checklist as well as Monthly Reporting Template. On weekly basis, the ESA will undertake inspection of environmental and social issues on-site to measure their performance against given key performance indicators (KPI). This exercise will be done in the presence of the PIU-CLO for them to verify, and sign-off the monitoring sheets. The PIU-CLO will in turn perform monthly monitoring in the absence of ESSS using the monthly monitoring checklist. Using the collected data, the PIU-CLO will generate information to draw up monthly report to the ESSS following the Monthly Reporting Template.

The PIU-CLO will also work closely with LENASO to ensure that all groups that are affected by the project have undergone necessary training in terms of HIV/AIDS, SEA and GBV at the prescribed intensity and frequency.

6 CAPACITY BUILDING

A key component of ESMP success depends of effective capacity building of the implementing and monitoring institutions, the training of staff and all others involved in the ESMP, including the construction contractors. These efforts will also be assisted by the implementation of technical assistance by outside consultants. The following training shall be considered, for effective implementation of this ESMP.

6.1 CAPACITY BUILDING FOR THE ROADS DIRECTORATE, MOPW, TICP

The key capacity requirement will be development of an overarching Environmental and Social Management System by Roads Directorate, and MoPW that can encompass overall management of the construction phase and then evolve to provide a robust management system for management of environmental and social issues for all the Project components.

The Roads Directorate has an established environmental unit, headed by the Environment and Safety Manager to oversee the preparation, implementation and oversight of the ESMP. The environmental unit shall be provided with enough technical and financial resources to complete this oversight role; external resources or contractors may be required.

Similarly, there is a need for capacity building to provide environmental unit staff to be responsible for social and community management. The MoPW, through the PIU will appoint a community liaison officers (CLO) for each project site with responsibility for managing the stakeholder engagement plan and other social commitments included within this ESMP, e.g. implementation of the Community engagement processes, HIV/AIDS awareness programme, GBV/SEAH sensitisation programme, and impact enhancement commitments related to promoting the development of local communities. The CLOs shall work directly with LENASO, which has been assigned to support TICP with awareness raising on Sexual Exploitation and Abuse (SEA) and HIV&AIDS.

In order to be effective, the CLO shall be capacitated to have the authority to negotiate on behalf of the TICP at the project site. This requires a clear reporting structure and clarification as to which decisions CLO can take unilaterally, and which are to be passed on to higher levels within the project. Direct reporting lines should be used to enable senior managers to more effectively control

risks by being kept informed of field-level information in a timely manner. The more likely it is that the concerns of local stakeholders might pose a risk or reputation issue for the Project.

Moreover, RD shall engage a Project Supervision Consultant (PSC), who will supervise all the 10 CERC projects under direct supervision of the newly appointed CERC Project Manager (PM).

6.2 CAPACITY BUILDING FOR CONSTRUCTION CONTRACTORS

The construction contractors shall have staff trained to ensure contractor compliance with ESMP requirements. Continuous, on job capacity building for construction workers will be in the form of toolbox talks, that will be carried out on weekly basis, as per the construction works schedules. Toolbox talk topics will be determined by the nature of work hazards identified for a particular work activity. Specific training to the construction contractor environmental, health and safety unit should be provided as follows:

- Environment, health and safety at work place;
- Managing COVID-19 risks at the work place;
- Managing GBV;
- Managing HIV/AIDs, and other sexually transmitted diseases;
- Project specific Grievance redress mechanism;
- Community relations and public consultation procedures;
- Waste management;
- Other relevant topics, that the project manager may see necessary.

7 MONITORING AND REPORTING REQUIREMENTS

Effective monitoring, and reporting is essential for rendering an ESMP of practical value. Routine independent auditing provides the necessary impetus for continual improvement. Without these two fundamental elements, such systems simply degenerate into data collecting exercises. Performance monitoring, reporting and auditing should be carried out to ensure compliance with the requirements of this ESMP. The final scope and format of all reports proposed herein will be agreed with the World Bank and Roads Directorate prior to them being required and produced. Furthermore, each of these reports will be submitted to the World Bank and the Roads Directorate for review and disclosure.

7.1 ADAPTIVE MANAGEMENT

The ESMP and plans contained herein will adopt an "adaptive management" approach throughout the life cycle of the Project. The creation of the plans at the outset is a fluid process with the management objectives and performance indicators tailored to the current design and objectives of the Project. The ESMP utilizes to the extent possible existing project knowledge to fully address the actual environmental and social impacts of the Project at the time and allow flexibility in environmental and social management decisions made on the Project.

To ensure adaptive management of the ESMP the following actions will be implemented:

- The ESMP will be reviewed and amended in accordance to the Project design and status as it evolves.
- Key information about any changes to project description will be regularly reviewed (monthly) and site visits undertaken by the Road Department EHS staff, and TICP ESS staff, dedicated to the project, to identify the true impacts of the Project.
- Ongoing evaluation of the effectiveness of measures included in the ESMP will be undertaken on a regular basis as the Project evolves and develops and throughout design, construction, operation and decommissioning of the Project. Evaluation will be undertaken through ongoing communication with, contractors, stakeholders and the World Bank supplemented by site audits and monitoring data review to identify weaknesses and / or gaps in the management plan. The ESMP will be changed and/or updated accordingly to ensure appropriate, robust and effective environmental and social management commensurate to the scale of the Project through its lifetime.

7.2 ESMP PERIODIC MONITORING AND REPORTING BY RD, AND TICP

The ESMP involves multiple organizations and responsibilities shared between Roads Directorate (a division of the Ministry of Public Works, and Ministry of Transport), Contractors, and TICP through technical staff such as the TICP ESS specialist, TICP CLOs, Project Manager, RD ES manager, RD Sociologist, RD Supervising Engineer, the Contractor SHE officer, and the independent Project Supervision Consultant.

Environmental and social supervision shall be completed during project construction to ensure compliance of the construction contractor with ESMP provisions and other regulatory requirements. Monitoring shall also be done during site preparation, construction and operations to verify the success of mitigation measures.

The environmental unit of the RD, and TICP shall periodically review, monitor and audit the effectiveness of the ESMP during site establishment, weekly, and monthly operation phases of the project, using the monitoring checklist in annex 10.1, 10.2, and 10.3, respectively. The audit program should adequately cover the scope, audit frequency of the project. The frequency of audits should reflect the intensity of activities (typically more common during construction), and non-compliances raised in prior audits.

The RD, and TICP shall review the ESMP to assess its effectiveness and relevance as follows:

- A full review shall be periodically when project scopes changes;
- Following a reportable incident, or a significant non-compliance; and
- Following an addition, up-date or change order to the ESMP.

The review of the ESMP should consider the following:
Adequacy of data collection, analysis and review;

- Reporting;
- Non-compliances; and
- Corrective actions implemented.

The ESMP shall also be reviewed periodically to evaluate environmental controls and procedures to make sure they are still applicable to the activities being carried out. The review shall include

analysis of the data collection and analysis of data, monitoring reports, incident reports, complaints/grievances and feedback from stakeholders, reports, consultation meeting minutes and training records to evaluate the effectiveness of ESMP procedures. Site visits, photographic evidences, interviews and other auditing methods may also be used.

7.3 ESMP MONTHLY MONITORING AND REPORTING BY PROJECT SUPERVISION CONSULTANT

For the construction contract the Consultant shall prepare separate monthly progress reports on the construction works, planned works and expenditure. He shall submit one paper copy and electronic copy backed up by excel spreadsheets of the monthly progress. The monthly progress reports shall be made as of the end of each calendar month and submitted by the 15th day of the following month and shall include reports for each month of operation including advice to the Client. When any phase of the project work falls behind schedule, the Consultant shall make recommendations in writing to the Client as to the action to be taken to expedite progress. The monthly progress reports shall contain among other sections, environmental and social safeguards compliance section detailing the compliance and noncompliance issues as per the ESMP requirements.

7.4 ESMP MONITORING AND REPORTING BY CONTRACTOR

All contractors will be required to prepare a monthly report for issue to the Roads Directorate Environmental and Safety Manager. This report is guided by a weekly, and monthly monitoring checklist (Annex 10.2, and 10.3) that the contractor is required to fill prior to preparation of the monthly report. The checklists are core verified, and signed by the site CLO. These reports should normally be no more than one or two pages in length, to summarize the following:

- Progress in implementing the ESMP and parallel management plans;
- Findings of the monitoring programmes, with emphasis on any breaches of the control standards, action levels or standards of general site management;
- Outstanding Non-Compliance Reports (NCRs);
- Summary of any complaints by external bodies and actions taken/to be taken; and
- Relevant changes or possible changes in legislation, regulations and international practices;
- Any breaches of the acceptable standards specified by law/construction permits and/or this ESMP should be reported to The Roads Directorate, using a NCR Form.

8 INFORMATION DISCLOSURE AND STAKEHOLDER CONSULTATIONS

The World Bank disclosure policies require that project ESMF and ESIA/ESMP are disclosed, and project reports are made available to project affected groups, local NGOs, and the public at large. Public disclosure of ESIA/ESMP documents is also a requirement of the Government of Lesotho's environmental procedures.

8.1 DOCUMENTS DISCLOSURE

CERC Environment and Social Management Framework was prepared as an addendum to the existing ESMF[11]of the Transport Infrastructure and Connectivity Project (TICP) (P155229) (the Project). It describes additional information on the environment and social safeguards, as well as Occupational Health and Safety (OHS) and Sexual Exploitation and Abuse/Sexual Harassment/Gender/GBV requirements for the implementation of the proposed activities to be carried out under Component 4 of the Project (Contingency Emergency Response Component or CERC). The current CERC ESMP is also being prepared as an addendum to the existing generic ESMP for the TICP (P155229)[12], to detail an additional information specific to the CERC project sites, such as baseline data, scope of works, etc., for each project site.

The Ministry of Public Works (MoPW) will be the project owner while the Roads Directorate (RD) will be the project implementation unit (PIU) and they will be assisted by the Disaster Management Authority (DMA). The National Disaster Relief Task Force (NDRTF) will be responsible for guiding and coordinating all Contingency Emergency Response Component (CERC) activities and is chaired by the Deputy Prime Minister. These key stakeholders will be continuously engaged throughout the project implementation to ensure effective implementation of this ESMP.

The following environmental and social safeguards instruments were prepared for the parent project by the Roads Directorate as the implementing agency:

- An **Environmental and Social Management Framework (ESMF)** was prepared and disclosed (June 01, 2017) to establish procedures for screening all proposed sub-

[11]http://documents1.worldbank.org/curated/en/516191498681117803/pdf/SFG3470-V1-EA-155229-Box402916B-PUBLIC-Disclosed-8-17-2017.pdf

[12] https://documents1.worldbank.org/curated/en/873791501187882999/pdf/SFG3470-V2-EA-155229-Box402916B-PUBLIC-Disclosed-8-1-2017.pdf

projects/investments for their potential adverse environmental and social impacts; specified measures for managing, mitigating and monitoring environmental and social impacts during project operation; and outlined training and capacity building arrangements needed to implement the ESMF provisions. The ESMF proposed a generic Environmental and Social Management Plan (ESMP) to mitigate potential impacts during project implementation.

- **A Resettlement Policy Framework (RPF)** was also prepared and disclosed (April 01, 2017) to address any resettlement impacts and issues that may occur for sub-projects identified during implementation. Screening criteria and relevant protocols are included as part of the RPF. The RPF defines terms and provides guidance for involuntary acquisition of land or other assets (including restrictions on asset use), and establishes principles and procedures to be followed to ensure equitable treatment for, and rehabilitation of, any persons adversely affected.

8.2 STAKEHOLDER ENGAGEMENTS

The implementation of each specific sub project investment under the TICP will require that public consultation and stakeholder engagement is carried out as a means of gathering information on public concerns, issues, perception, fears and suggestions on proposed investment.

Public consultation will be conducted in line with the requirements of Environmental Act 2008 which calls for utilisation of all forms of consultation and stakeholder engagement and the Bank's requirements for public consultation.

The consultations will be conducted

- through among others means;
- Key Informant Interviews;
- Direct Interviews with Project Affected Persons;
- Workshops and Meetings;
- Public Hearings;
- Advertisements' in the print and electronic media;

- Focus Group Discussions;
- Internet and telephone interviews

Community engagement and sensitization activities are ongoing, implemented by Road Directorate, and LENASO, that guide preparation of this ESMP, and the LAP (under preparation) (Annex 10.6).

8.3 GRIEVANCE REDRESS MECHANISM

Grievance mechanisms provide a formal avenue for affected groups or stakeholders to engage with the Road Directorate or CERC projects communities, or any project workers on issues of concern or unaddressed impacts. Grievances are any complaints or suggestions about the way the CERC projects are being implemented. They may take the form of specific complaints for damages/injury, concerns about routine project activities, or perceived incidents or impacts. Identifying and responding to grievances supports the development of positive relationships between projects and affected groups/communities, and other stakeholders.

The World Bank standards outline requirements for grievance mechanisms for some projects. Grievance mechanisms should receive and facilitate resolution of the affected institutional or communities' concerns and grievances.

The World Bank states the concerns should be addressed promptly using an understandable and transparent process that is culturally appropriate and readily acceptable to all segments of affected communities, at no cost and without retribution.

Mechanisms should be appropriate to the scale of impacts and risks presented by a project. Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. The management of grievances is therefore a vital component of stakeholder management and an important aspect of risk management for a project. Projects may have a range of potential adverse impacts to people and the environment in general, identifying grievances and ensuring timely resolution is therefore very necessary.

8.3.1 GRIEVANCE REDRESS PROCESS

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms through RD website, RD/TICP office walk-ins; phone call; letter, e-mail; recorded during public/community, CLO on site, Suggestion box on site, etc., Processing of the grievance will follow the grievance redress process outlined in table 8.1 below.

Table 8.1: Grievance Redress Process

Process	Description	Time frame	Process Description
Identification of grievance	Face to face; phone; letter, e-mail; recorded during public/community interaction; others	1 Day	A number of uptake channels will be used to identify and accept the grievance.
Grievance assessed and logged	Significance assessed and grievance recorded or logged (i.e. in a log book)(annex 10.8)	4-7 Days	Once AP have submitted a grievance, it will be accessed and logged/ recorded in the grievance register (annex 10.8) and AP will receive acknowledgment of receipt within 4-7 days, regardless of whether they were received in writing or verbally unless AP refrain from providing contact details. The grievance will be assessed and investigated.
Grievance is	Acknowledgement of grievance	7-14 Days	A letter, email, SMS, etc to be used to

acknowledged	through appropriate medium		confirm receipt of a grievance from an AP and may invite the AP to an initial grievance meeting.
Development of response	Grievance assigned to appropriate party for resolution Response development with input from management/ relevant stakeholders	4-7 Days 7-14 Days	It's important to respond to every grievance in a timely, fair manner, taking the proper grievance-handling steps.
Response signed off	Redress action approved at appropriate levels	4-7 Days	Each redress stage requires response sign off by the resolution provider.
Implementation and communication of response	Redress action implemented and update of progress on resolution communicated to complainant	10-14 Days	Throughout the redress process, effectively communicating the status, progress, and referrals made, to AP will be critical to acceptable resolution.
Complaints Response	Redress action recorded in grievance log book Confirm with complainant that grievance can be closed or determine what follow up is necessary	4-7 Days	The step gives AP opportunity to accept or reject the provided resolution in writing within 4-7 days of receiving a resolution, for documentation, and future reference.

Close grievance	Record final sign off of grievance If grievance cannot be closed, return to step 2 or refer to sector minister or recommend third-party arbitration or resort to court of law.	4-7 Days	Final sign off on by TICP Coordinator if it is successfully resolved.

8.3.2 ESTABLISHMENT OF GRIEVANCE REDRESS COMMITTEE

Each sub project investment will have a Grievance Redress Committee (GRC) established for the purpose of handling grievances related to environmental and social concerns, and will be coordinated by the CLO. The GRCs will be ad hoc institutions established primarily for the sub project investment and will have no legal mandate and should at a minimum comprise of:

1. Project Affected Persons representative;
2. Environmental and Social Safeguards Specialists from TICP;
3. Environment and Safety Manager from RD;
4. Community Liaison Officer (CLO);
5. Contractor;
6. Supervision Engineer;
7. Women and Youth Representatives, active in the project area;
8. Representation of active NGOs or CBOs in project area

8.3.3 OMBUDSMAN/COURT OF LAW

The Director must within 30 days of receipt of the request, will issue a record of decision affirming, modifying or reversing its earlier decision. The option of appeal is open to both the developer and the Interested and Aggrieved Parties. This step is a prerequisite before an aggrieved party may proceed to seek resolution from office of Ombudsman or court of laws.

9 ESMP IMPLEMENTATION BUDGET

The low impact nature of the CERC projects, both in magnitude and footprint, has made it possible for the budgets around the projects to be largely operational, which have been built into the individual projects contracts, and TICP operation budget. The ESMP budget per project site is estimated at 10-12 percent of the individual project construction cost.

These budget items will include, inter alia:

- Co-ordination and Communication;
- ESMP Compliance Monitoring, and Inspection activities;
- Project specific Grievance Redress Mechanism;
- End of projects Environmental and Social auditing;

It is expected that the cost associated with some measures may change. In the event of TICP Transport, Infrastructure and Connectivity Project-Environmental and Social Management Plan cost changes, an update of the overall environmental and social budget with suggestions on the way to reallocate funds will be done. suggestions will be presented to the World Bank for review, and no objection.

10 ANNEXES

10.1 ESMP SITE ESTABLISHMENT CHECKLIST

Inspection Date & Time: ……..Site Name……...

Project Phase:

……..…Activities……..

ESA (Name)…….……...(Sign)……

PIU-ESSS(Name)……..(Sign)……...

RD Environment and Safety Manager (Name)……(Sign)……

Site Establishment (Pre-construction)

Item	**Available or Not**
Office	
Storeroom (lined floor)	
Two Toilets (male and female) located 10m away from water sources	
Site Camp fenced	

Work Area Demarcated	
Batching Area (non-reactive base)	
Waste Management Area (labelled bins)	
Construction Signage (safety signs)	
Fire extinguisher at storeroom (serviced and in working order)	
Portable Water	

Health and Safety

Item	**Available or Not**
Appropriate PPE (overalls, safety vests, hard hats, heavy duty gloves, steel toe boots, steel toe gumboots and nose bag)	
First Aid Kit	

Grievance Redress Mechanism

Item	**Available or Not**
GRM box installed	
GRM box opened according to the specs	
Padlock	

COVID-19 Management

Item	Available or Not
Infrared Thermometer (non-contact)	
Visitors Register	
Sanitizer (at 4 hygiene stations)	
Tippy tap (at 4 hygiene stations)	
Liquid hand wash (at 4 hygiene stations)	
Small bins with lids (next to stations)	
Paper towel (esp. @ stores & work area)	

Licenses, Permits and Approvals

Item	Available or Not
Water Use License	
Blasting Permit	
Written approval for borrow pits (from local authorities)	

Temporary Land Acquisitions and Accommodation Agreements

Item	Available or Not
Land Acquisition Letter	

Accommodation Agreements	

Key Personnel

Item	Available or Not
Environmental Site Agent (ESA)	

Approvals of site layouts

1. **Toilet location**: the toilet must be at least 10m away from the water source and on a flat area as opposed to sloppy area which most of the time will lead storm water run-off into the river. Exceptions are allowed provided there is enough vegetation surrounding the toilet e.g. at Ralie the toilets are closer to the water course but there are surrounding trees, shrubs and grass that will prevent infiltration of the pit latrine sludge.
2. **Site Office**: a site office should be available on-site with enough space to display all the project implementation and monitoring tools for ease of access by the supervision team to track project progress. Sites with access challenge are allowed to hire out a site office at a nearby village. A fire extinguisher should be installed at the storeroom.
3. **Site Storeroom**: the storeroom must have a protected floor to avoid contamination of soil by cement, fuel and lubricants.
4. **Batching Area**: should be located away from water source to avoid contamination from cement. If batching is done on an existing rock very close to water source, it needs to be protected by walls that will stop run-off from the batching area from getting into water.
5. **Waste Management Area**: waste bins to accommodate various waste streams must be provided on site and clearly labelled accordingly. The bins must be secured to endure bad weather.
6. **Grievance Redress Mechanism**: the GRM box should be indicated on the site layout in cases where the community concluded on having it installed on-site.

7. **Hygiene Stations**: according to the COVID-19 method statement (annex 10.5) there should be 4 stations: 1 – entry/exit point, 2 – toilets, 3 – Storeroom and 4 – Work area.
8. **Demarcation**: fencing is recommended at site offices to ensure controlled movement on-site. The work areas should be demarcated as well.
9. **Aggregates area**: indicate where aggregates will be stored on-site.
10. **Temporary Land Acquisition**: the layouts are accompanied by proof of permission from landowners (chief or community member) for the contractor to use their land and set up site camps and store aggregates for the project duration.
11. **Accommodation Agreements**: the site camps proposed or established do not include accommodation for skilled labourers who will reside in the village therefore proof of the accommodation arrangements is required.

10.2 WEEKLY ENVIRONMENTAL AND SOCIAL MONITORING SHEET

Inspection Date & Time:……Site Name……...

Project Phase:……Activities……..

ESA (Name)……(Sign)…….PIU-CLO(Name)……(Sign)……..

Inspection Item	Key Performance Indicator	ESMP Compliant			Comment	Corrective Action Required
		Yes	No	N\A		
1. Camp Site	Waste disposal plan					
	No. of garbage bins					
	Fence					
	Firefighting equipment in working order					
2. Top soil	Height within 2.5m					
	Oil protection					
	Erosion Protection					
	Compaction					

	Chance Find Procedure Implementation					
3. Storage Areas						
Fuel	Containment					
Topsoil	Water and oil diversion					
	Seeding					
Explosives	Established magazine					
	Approval of design and siting					
	Magazine fenced and safeguarded					
Aggregate	Compacted non-reactive base					
Cement	Enclosed and clean					
Batching	Rain water diverted					
	Demarcated					
	Effluent not discharged into the environment					
Waste	Labelling					

	Secured					
4. Blasting	Blasting certificate					
	Blasting notifications					
	Dilapidation survey data					
	Blasting permit from Supervising Engineer					
	Alternatives to blasting considered					
	Compensation in case of injury or damage					
5. Dust Control	PPE (dust masks)					
6. Access roads	Existing access roads used					
	New road access approvals					
	Drainage established					
	Method statement for community crossing (pedestrians)					
7. Sanitation	Efficient, sanitary and non-					

	offensive latrines					
	10 employees per toilet					
	Both gender streams accommodated					
8. Solid wastes	Waste separation					
	Waste reused					
	Approval (Supervising Engineer) for off-site disposal area					
	Site induction register					
9. Water courses and effluent	Water use permit					
	Notification to DWA					
	Rehabilitation of river banks					
	Water turbidity					
	Odour					
	Flow					
10. Biodiversity	Awareness poster on protected					

	fauna and flora					
	Incident reports					
	Toolbox talk on biodiversity conservation					
11. Borrow pits	Ponds in borrow pits					
	Slopes					
	New pits approved by ESA					
12. Personnel						
Labour recruitment	Clock-sheet					
	No. of local labourers					
	Transparent recruitment procedure					
Facilities	Cooking (camp)					
	Food (labourers)					
	Recreational Activities					
	Laundry					

Health and Safety	Portable water					
	PPE					
	Safety procedures and signage					
	Disease outbreak incident reports					
	First Aid and Emergency transport					
	HIV/AIDS awareness					
	Free condoms					
	GBV referral system					
COVID-19	Minimum 4 hygiene stations with running water, liquid hand wash, alcohol based sanitizer					
	Daily provision of disposable face masks					
	Red heavy duty gloves provided					
	COVID 19 education for employees					

	Social distancing maintained on-site					
	Emergency transport available					
	Emergency Contact details for nearest health facility					
Security	Camp & Storage areas secure					
Conduct	Adherence to safety warnings					
	Deforestation					
	Fires					
Education	Signed induction forms					
	Toolbox talks register					
13. Community Engagement	CLO appointed					
	Grievance Redress Committee appointed					
	GRM exists					
14. Cultural Heritage Sites	Archaeological chance find procedure in place					

	Chance finds records					
	Community participation in relocations					
15. Affected Fields	Planted fields avoided					
	Compensation for affected fields					
16. Site Clean-Up and Rehabilitation	Pre-project conditions restored					
	Disturbed areas revegetated					
	Visual impact minimised					
17. Monitoring	E & S records available					
	Monitoring is weekly					

10.3 MONTHLY ESMP COMPLIANCE MONITORING AND EVALUATION CHECKLIST

Inspection Date & Time:……Site Name……...

Project Phase:……Activities……..

Environmental Site Agent……. PIU-CLO…….

C = Compliant NC = Non-Compliant PC = Partially Compliant N/A = Not Applicable

Ref.	ESMP Commitment	C	NC	PC	N/A	Evidence	Corrective Action Required
1.	**CAMP ESTABLISHMENT & CONSTRUCTION**						
1.1	Camp and Construction sites fenced						
1.2	Camp and Construction sites security established						
1.3	Camp and Construction sites kept neat						
1.4	No breaches on camp and construction site fence						
1.5	Location of camp poses minimum impact on Environmental and Social conditions						
1.6	No unauthorised pedestrian or vehicular access allowed into fenced off-limits						
1.7	No construction camp located on sensitive ecosystem						

1.8	Camp buildings are either containers or prefabricates						
1.9	Camp buildings appropriately constructed						
1.10	Standard firefighting equipment available on site and in working order						
1.11	No gas/metal cutting or welding takes place in the camp area						
1.12	All construction related structures, equipment, materials and facilities are removed at the completion of the project						
1.13	The construction site is cleared and cleaned and rehabilitated to the satisfaction of the ESA						
2	**CLEARING, STRIPPING AND GRUBBING**						
2.1	Use of appropriate machinery for each task ensuring minimal environmental impact						
2.2	Topsoil cleared of invasive vegetation and debris						
2.3	Topsoil not compacted						

2.4	Topsoil stockpiles within 2.5m height, not steeper than 1 vertical to 2.5 horizontal and not stored for more than 1 year						
2.5	Topsoil protected from oil contamination						
2.6	Topsoil protected from soil erosion						
2.7	Chance Find Program followed in case of unearthed artefacts						
3	**INITIAL EARTHWORKS AND PLATFORMS**						
3.1	Stormwater diverted away from easily erodible areas e.g. Topsoil stockpiles, disturbed areas and steep ground						
3.2	Soil piling done on flat surfaces						
3.3	Stockpiles seeded or protected by erosion control fabric						
3.4	Collect water run-off from platforms into drainage system						

4	**HYDROCARBON MANAGEMENT**						
4.1	No oil or fuel leaks from vehicles or plant						
4.2	All vehicles have drip trays for emergencies						
4.3	No vehicle servicing and refuelling on bare soil						
4.4	No oils enter waterbodies						
4.5	Use of oil spill kits in case of spills						
4.6	Oil separation performed prior to water being discharged into the environment						
4.7	Staff trained on hydrocarbon handling and clean up						
5	**STORAGE AREAS**						
5.1	***Fuel***						
a)	Stored above ground						
b)	Stored on bund walls with a sump installed and the walls are such that they accommodate 110% of the contents of the storage facility						
5.2	***Topsoil***						
a)	Stored on a flat surface						

b)	Protected from stormwater run-off and strong winds						
5.3	***Explosives***						
a)	Explosives stored and handled in accordance with *South African Explosives Act* of 1956, *Lesotho Explosives Proclamation Act no.41* of (1958) or any regulations since published in terms of Section 75 of *Lesotho Environment Act* of 2001						
b)	Established explosives and detonator magazine on site						
c)	Design and siting of storage approved by the Department of Mines						
d)	The magazine fenced and safeguarded						
5.4	***Aggregate***						
a)	Fine aggregate is stored on a compacted sub-base platform protected from erosion (e.g. bund walls)						

b)	Coarse aggregate stored on compacted inert sub-base material						
c)	No aggregate spread beyond the storage area						
5.5	***Cement***						
a)	Storage area is enclosed						
b)	The storage area is clean; free from cement products						
5.6	***Batching***						
a)	Batching area demarcated for this purpose						
b)	Storm water not allowed to follow through this area						
c)	Area enclosed in bund walls divided into compartments for various types of materials						
d)	Air filters cleaned and replaced on regular basis						
e)	Batching area effluent discharges into sedimentation pond						
f)	The pond undergoes evaporation for residual solid to be						

	Collected for proper disposal						
5.7	***Waste***						
a)	Waste collection site demarcated						
b)	Use of labelled waste bins for easy waste separation (e.g. of waste streams: general waste, concrete rubble, hazardous waste and effluent)						
c)	Bins secured or guarded against wind and animals						
d)	Appropriate signage for hazardous waste						
6	**BLASTING MANAGEMENT**						
6.1	Only certified blaster conducts blasting						
6.2	Demarcated blasting zones						
6.3	Blasting schedule developed and communicated with employees and communities						
6.4	Deploy flagmen to control human and animal movement during blasting						
6.5	Wear appropriate PPE at all times						
6.6	Pre- and post- blast dilapidation survey in the						

	vicinity (any property within 100m of the blasting area) of the site completed and signed off by households.						
6.7	Supervising Engineer or their representative permit or prohibit blasting in writing						
6.8	Blasting performed where rock shattering is impossible						
6.9	Injury to persons and animals and damage to property and concrete works already set-up prevented						
6.10	Compensation paid in full by the contractor in case of injury or damage repairs.						
7	**DUST CONTROL**						
7.1	Appropriate measures taken to minimise dust during drilling and batching						
7.2	Dust control by spraying						
7.3	Personnel wear nose masks for protection against dust						
8	**ACCESS ROADS AND ACCOMMODATION OF TRAFFIC**						

8.1	Use of existing access roads favoured						
8.2	Topsoil removed (**refer to section 2**) prior to constructing new access road						
8.3	All new temporary roads approved by Project Manager						
8.4	Temporary roads decommissioned and rehabilitated using stockpiled topsoil						
8.5	Areas susceptible to erosion protected by permanent or temporary drainage works						
8.6	Detailed method statement for pedestrian traffic management if the bridge is to be constructed at the existing community crossing						
9	**SANITATION**						
9.1	Adequate chemical latrines (or temporary pit latrines: VIP Type) provided on site						
9.2	Chemical latrines serviced on weekly basis to						

	prevent overflow						
9.3	Latrines are efficient, sanitary and non-offensive						
9.4	Minimum ratio of 1 toilet to10 persons per one work area (i.e. camp site and construction site) NB: If both men and women work on the project, 2 toilets (one with sanitary facilities) are required irrespective of whether there are10 or less employees.						
9.5	The latrine(s) are decommissioned, structures removed from site and pit filled with stockpiled soil						
10	**HOUSEKEEPING AND WASTES**						
10.1	Temporary storage of construction waste kept in designated areas						
10.2	Off-site disposal of construction done in an approved area (approved by Supervising Engineer and the property owner)						
10.3	Spoil material used for rehabilitation to mitigate the visual impact (spread and level out)						
10.4	General waste generated on site stored and sent to						

	approved site						
10.5	Site clean-up done regularly and litter appropriately kept in refuse bins						
10.6	Site induction includes waste management: waste handling, separation and appropriate PPE						
11	**HYDROLOGY AND RIVER COURSES**						
11.1	Contractor notified the Department of Water Affairs and provided construction programme prior to commencement of works close to the river or riverbank						
11.2	Construction works cause no further damage to the river embankment and rehabilitation implemented in case of any preventable damage						
11.3	River water not contaminated with construction materials and other pollutants						
11.4	No laundry or car wash done in the river						
11.5	No greywater discharged into the river						
11.6	No eroded sediments enter the river						
11.7	The river flow is unobstructed						
12	**FAUNA AND FLORA**						

12.1	Impact on natural vegetation kept minimal						
12.2	Indigenous plants and animals are protected						
12.3	All incidents of harm to any animal or natural vegetation reported to ECO						
13	**BORROW PITS**						
13.1	Existing borrow pits used as far as possible						
13.2	Pond formation avoided in borrow pits						
13.3	No steep slopes allowed in a borrow pit						
13.4	All borrow pits rehabilitated after use						
13.5	New borrow pits endorsed by ECO						
14	**PERSONNEL**						
14.1	***Labour Recruitment***						
a)	Locals recruited for unskilled and semi-skilled labour positions						
b)	Normal working hours adhered to otherwise overtime principle applies and overtime renumerated accordingly (Labour Code)						
c)	Transparent non- discriminatory (in terms of gender, disability, religion and culture) recruitment policy in place						

14.2	***Facilities***						
a)	Cooking facilities provided for staff in the camp						
b)	Food services provided for day labourers						
c)	Entertainment centre (bar, board games) for residing staff						
d)	Laundry services for residing staff						
14.3	***Health and Safety***						
a)	Portable water made available for staff by contractor						
b)	Brand new PPE for each newly appointed person						
c)	Safety regulations and precaution in place and communicated with staff						
d)	Disease outbreaks prevented or overcome						
e)	Adequate First Aid and Emergency Transport services available						
f)	Fire Fighting equipment available at all areas prone to risk of fire						
g)	Safety warning signs put up, visible to every employee						
h)	Employees have clear understanding of HIV/AIDS						

	and associated preventative measures						
i)	Employees have access to HIV testing services, Free preventative commodities, ART and GBV referral system						
14.4	***Security***						
a)	Tight security maintained on site at all times						
14.5	***Conduct***						
a)	Observe safety warnings at all times						
b)	No tree felling except if approved by SE for execution of works						
c)	No fire setting outside designated areas						
d)	No trespassing on adjoining properties and no interference with livestock, crops or games						
e)	Personnel behaviour and discipline strictly supervised by the contractor						
f)	Measures to prevent hunting, capturing or killing animals are adhered to						
15	**PERSONNEL EDUCATION**						
15.1	Staff well educated and informed about the ESMP requirements through site inductions						

15.2	Staff conversant with Health and Safety regulations and precautions through daily toolbox talks						
15.3	Contractor enforces compliance to ESMP requirements by employees						
15.4	Employees sign off induction forms						
16	**COMMUNITY ENGAGEMENT**						
16.1	Community Liaison Officer appointed (link between the project and the community)						
16.2	Project steering committee elected to oversee community concerns regarding the project						
16.3	Grievance Redress Mechanism in place						
17	**CULTURAL HERITAGE SITES**						
17.1	An Archaeological chance find procedure is in place						
17.2	All archaeological chance finds are reported to the ESA						
17.3	Construction activities put on-hold after a chance find						
17.4	Investigations by Specialist/Archaeologist conducted						

17.5	Appropriate decision taken to alter the project design to preserve heritage or relocate the cultural objects						
17.6	Community participation in relocation plans						
18	**AFFECTED FIELDS**						
18.1	Efforts made to avoid disturbance to planted fields						
18.2	No vehicular traffic entered any agricultural field						
18.3	Slopes stabilised to protect agricultural fields						
18.4	Loss of fields compensated accordingly (TICP RPF document of 2017)						
19	**SITE CLEAN-UP AND REHABILITATION**						
19.1	All structures, equipment, materials and facilities removed						
19.2	Site cleaned to pre-project conditions						
19.3	Use 150mm thick topsoil to rehabilitate disturbed areas upon completion of construction						
19.4	Loosen up compacted soil through ripping parallel to the contours						
19.5	Suitable substitute materials used in case of insufficient topsoil						

19.6	Vehicle access prohibited after topsoil placement						
19.7	Indigenous grass mix used for revegetation						
19.8	Visual impact managed through landscaping						
19.9	Initial topography nearly restored						
20	**COVID 19**						
20.1	Enough Hygiene Stations established on-site						
20.2	Employees protected through PPE						
20.3	Sufficient awareness raising provided for employees and host communities						
21	**MONITORING**						
21.1	The ESA keeps records of monitoring						
21.2	The frequency of monitoring is adequate						

10.4 CHANCE FINDINGS PROCEDURE

10.4.1 INTRODUCTION

Chance Find Procedures outline what needs to be done when projects come across archaeological sites, historical sites, remains and objects, including graveyards or individual graves during excavations or construction. This procedure responds to OP/BP 4.11- Physical Cultural Resources. This Policy addresses physical cultural resources which are defined as movable or immovable objects, sites, structures that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Physical cultural resources may be located in urban or rural settings and may be above or below the ground.

SUMMARY OF IMPACT MANAGEMENT

As with any project of this scale and nature, there are certain impacts that cannot be entirely eliminated, i.e. Residual impacts after implementing mitigation measures. With respect to impact mitigation, the Project subscribes to the philosophy of impact avoidance (by reasonable changes to Project planning and/or design) and impact reduction (to reduce impacts to acceptable levels as reasonably possible).

OBJECTIVES AND TARGET

The objectives for the **construction phase** of the Project are as follows:

1. To mitigate impact through specified management actions;
2. To provide a Chance Finds Program to be followed in case unexpected archaeological resources are encountered;
3. To establish the roles and responsibilities of Project staff and contractors in relation to chance finds; and
4. To reduce the risk of major Project delay.

MANAGEMENT ACTIONS

The most effective way to manage potential impacts to cultural heritage sites is by well-planned avoidance through Project redesign. Where avoidance is not possible, impacts
will be managed through:

- Post-assessment archaeological test excavations (Pre-Construction Phase);
- A stakeholder engagement program (Pre-Construction/Construction Phases);

- Implementation of a Chance Finds Program (Construction Phase);
- Provision of Cultural Heritage Training to Project Staff (All Project Phases);
- Marking of Vulnerable Cultural Heritage Sites (Pre-Construction Phase); and;
- Reduced Vehicle Speed Limit Near Sites Prone to Vibration or Accidental Impact (All Project Phases).

STAKEHOLDER ENGAGEMENT PROGRAM

A stakeholder engagement program will be implemented that will seek the input of local communities regarding the sensitivities of cairns, graves and other sites. This program will:

- Identify which cultural heritage sites are currently utilised or viewed as significant by local communities in order to implement measures for avoidance of these sites during the construction and operation phases of the mine; and
- Where avoidance is deemed to be unfeasible, establish compensation measures including, but not limited to, site relocation or archaeological excavations to mitigate impacts to significant cultural heritage sites.

This focused stakeholder engagement program will be implemented during the preconstruction phase of the Project. The program will continue throughout the construction and operation phases to address stakeholder concerns as they arise.

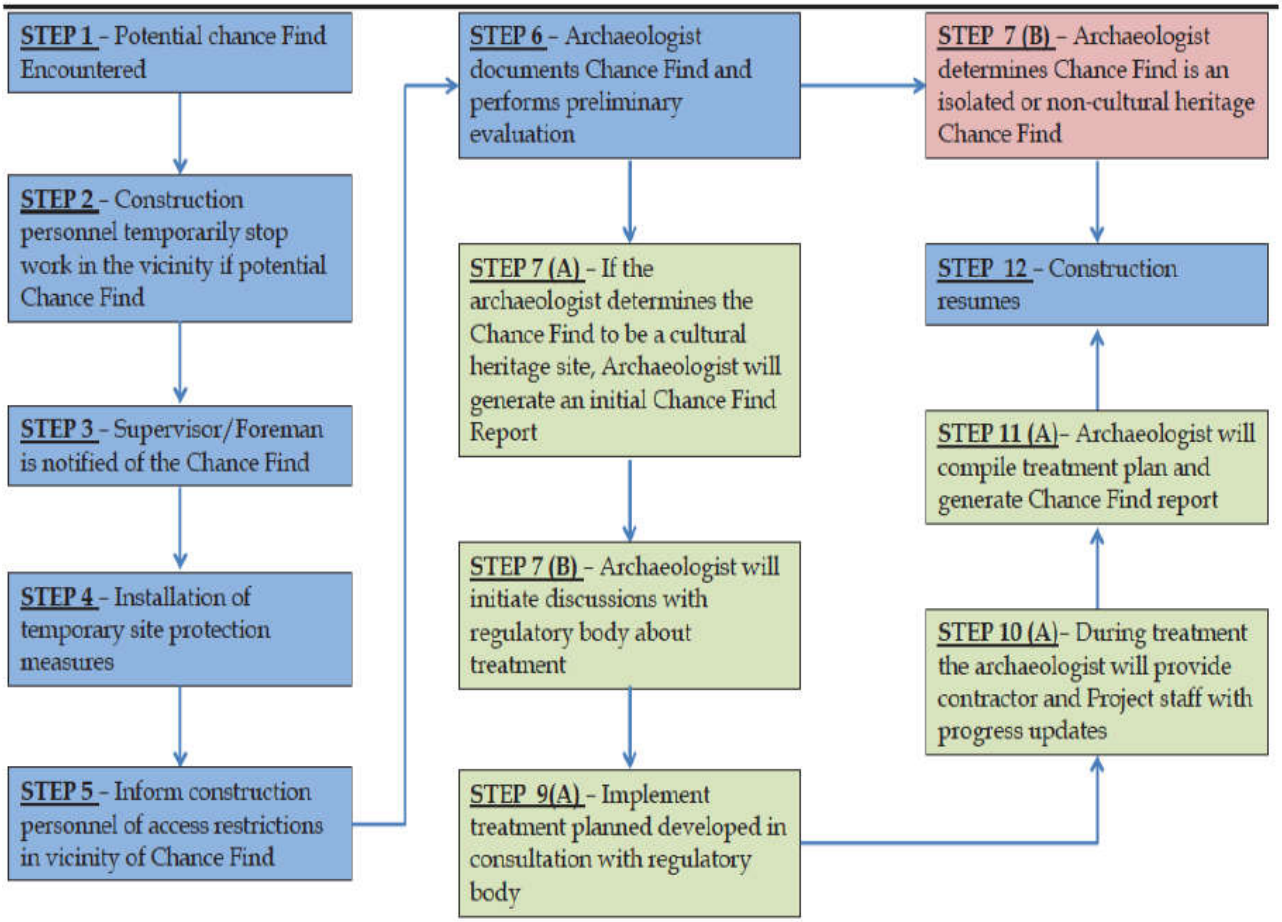
10.4.2 IMPLEMENTATION OF A CHANCE FINDS PROGRAM (CONSTRUCTION)

The Chance Finds Program is intended to manage impacts to known, probable and unknown cultural heritage sites during the Project construction phase. It also defines the protocols and procedures for assessing any unanticipated cultural heritage sites or materials encountered during the Project construction phase. These protocols include:

- Localized stop work authority and procedures for protecting cultural heritage materials encountered during construction;
- Procedures for the documentation and assessment of Chance Finds to determine if additional investigations are required;

- Protocols for consultation with Project management, cultural heritage specialists, and national regulatory bodies to design and implement additional investigations; and
- Roles and responsibilities of all stakeholders.

The Chance Finds protocol will be implemented through a combination of Project staff training and the use of an archaeological monitor(s). A generalized Chance Finds Program is outlined below which describes the approach.



A CHANCE FINDS PROGRAM INCLUDES THE FOLLOWING PROVISIONS: -

- A qualified cultural heritage specialist (1) should remain on-call and will provide oversight of the Chance Finds Program. The on-call cultural heritage specialist should be used on an as- needed-basis and will monitor the Chance Finds Program from his/her desktop. The on-call specialist should only conduct field monitoring in the case of unusual or highly sensitive and importance chance finds.
- An archaeologist will also remain on-call on an as-needed-basis and will only conduct field monitoring if the Project either encroaches on areas of known archaeological sensitivity, or encounters chance finds of low to moderate importance.

- The archaeologist must be present during all ground disturbing works conducted within specific areas of concern.
- Ground works in other areas will be monitored by at least one member of the Project staff that has received cultural heritage training.
- A chance find can be reported by any member of the Project.

Accordingly, it is necessary to provide cultural heritage training to all Project staff and sub-contractors. A separate section detailing cultural heritage training is provided in the next section.

- If a chance find is encountered the first course of action is to stop work in the vicinity of the find.

Then the following steps will be undertaken:

- Inform site supervisor/foreman.
- Install temporary site protection measures (warning tape and stakes, avoidance signs).
- Inform all personnel of the Chance Find if access to any part of the work area is restricted.
- Establish a localized no-go area needed to protect the Chance Find.
- Archaeologist will perform a preliminary evaluation to determine whether the Chance Find is cultural heritage and if so, whether it is an isolated or part of a larger site or feature.
- Artefacts will be left in place when possible; if materials are collected they will be placed in bags and labelled by Archaeologist and transported to the Archaeological
- Headquarters; no Project personnel are permitted to take or keep artefacts as personal possessions.
- Document filed through photography, notes, GPS coordinates, and maps (collect spatial data) as appropriate.
- If the Chance Find proves to be an isolated find or not cultural heritage, the Archaeologist will authorize the removal of site protection measures and activity in the vicinity of the site can resume.
- If the Archaeologist confirms the Chance Find is a cultural heritage site, they will inform the Archaeological Headquarters and initiate discussions with the latter about treatment.
- Prepare and retain archaeological monitoring records including all initial reports whether they are later confirmed or not. The record will include coordinates of all observations to be retained within the project's GIS system (viz. ArcGIS).

- Develop and implement treatment plans for confirmed finds using the services of qualified cultural heritage experts.
- If a Chance Find is a verified cultural heritage site, prepare a Final Chance Finds report once treatment has been completed.
- While investigation is ongoing, co-ordinate with on-site personnel keeping them informed as to status and schedule of investigations, and informing them when the construction may resume.
- If mitigation is required, then expedient rescue excavations will be undertaken by the local specialist, except in the case that the chance find is of international importance, such as early hominid remains. If early hominid remains are encountered special care will be taken and archaeologists with the appropriate expertise in addressing the find will be appointed.

10.5 METHOD STATEMENT FOR MANAGEMENT OF COVID 19 ON CONSTRUCTION SITES

10.5.1 INTRODUCTION

This method statement is to be used together with the Interim Guidance on COVID-19 considerations in construction/civil works projects, presented in annex 10.9.

COVID 19 is transmitted from one person to the next through splashing of infected saliva droplets when a person speaks, coughs or sneezes, touching contaminated surfaces and rarely through airborne transmission. These modes of transmission then suggest that the ideal prevention of COVID 19 spread would be through social distancing, avoiding touching potentially contaminated areas, wearing face masks and covering mouth and nose areas when coughing and sneezing.

Construction and or civil works often require large workforce including the supply chain. The characteristics of the workforce are determined based on regions of origin (national, regional or local), location of accommodation (on or off-site), nature of roles (requires tools or not, exchange tools among workers) and pre-existing health conditions. The co-existence of the various workforce characters coupled with large numbers increases chances of COVID 19 spread if not well managed.

Construction of community infrastructure such as roads are usually done within local communities and this poses a risk of infection to host villages. The risk could strain relationship between the project and the community if people feel they are being exposed to the disease by the project more so when the project is in under-serviced areas.

The project should also avoid having large numbers of unhealthy persons in their workforce as they will adversely impact on construction progress resulting in delays on project schedule. It is therefore crucial that a method statement is prepared to outline the implementation plan of COVID 19 management on construction site.

10.5.2 PLANNED PROJECT ACTIVITIES

a) CONSTRUCTION WORKS

Construction works comprise of a series of activities that require one or more people per activity and various tools or equipment (might be shared by workers) to complete tasks. Identifying activities, tools and how many labourers are required to perform a task enables risk assessment. The **CERC contractors** will undertake construction activities using the related equipment some of which are listed in **table 10.1** below.

Table 10.1: Construction Works and Required Equipment Roads and Bridges

Activities	Tools/ Equipment	Remarks
Excavation of foundations.	Pickaxes, shovels, wheelbarrows, ladders and water pumps.	Ladders are used on foundations deeper than 1m. Water pumps are used where there is a lot of water in seepage.
Reinforcement	Pliers and plain wire.	Bending on reinforcement is normally done from the supplier. Connections or nettings of foundation. Nets are done on site. Placing of the cage will require more than four people.
Concreting Mixing Placing /vibrations	Wheelbarrows, buckets shoves, concrete mixers, mechanical vibrator	For pouring or concrete. Wheelbarrows and use of any iron sheet can be used as means of transporting concrete to the lower point of the foundation
Shuttering of concrete	Shutter boards, plain wire conduits pipes	Fixing of shutter boards will be done using plain wire and conduits in order to maintain one line and firmly fixed in a manner that it will not be disturbed by pouring and vibrating.
Stone collection	Crowbars, wheelbarrows.	A number of workers are required to perform this task of stone collection
Ramps	Wheelbarrows, shovels, trowels, builders brushes, pointers, hummers	Mason person will be collecting stones from another labours for constructing ramp
Welding of steel sections for assembling of steel sections	Welding plant, welding rods, jig and clamps	Welding foreman will be welding with the help of other workers for assembling.
Steel sections mounting	Crowbar; round bars, scaffolding, welding plant, steel brush	A number of workers are required to perform this task of mounting steel section.

Activities	Tools/ Equipment	Remarks
Backfilling/ stone backfilling	Wheelbarrows	A number of workers will be exchanging wheelbarrows in order to perform this task.

b) ANCILLARY ACTIVITIES AT CONSTRUCTION SITES

Table 10.2: Ancillary Activities in construction

Activity	Tools/Equipment	Remarks
Community Engagement and Recruitment	Pens Papers Clip boards Flyers Voluntary Counselling and Testing	People gather in large numbers during this activity and queue up for registration. RD staff use stationery to compile lists for recruitment. The public get in close contact with facilitators during registration and nurses in health services shelters.
Transporting Staff and Equipment to and from site	Motor vehicles	Vehicles of different capacities will be used to transport staff and equipment to and from site. A construction vehicle might also be used by more than one driver.
Receiving materials from suppliers	Manpower (physical off-loading) Wheelbarrows, Spades (for crushed stone)	Suppliers will deliver different materials which will be physically off-loaded by labourers and some may require the use other equipment for the materials to reach their storage areas.
Access to Storage areas	Tools, Machinery, Fuel, Waste Bins,	Tools, machinery, and fuel will be stored in a secure store room on-site. There will also be waste bins storage area.
Monitoring entry/exit on site	Record Book Pen,	Movement in and out of site is recorded by the respective personnel (e.g. Security guard, SHE

Activity	Tools/Equipment	Remarks
		officer).
Lunch breaks	Utensils	Staff will get a break to sit and eat their lunch.
Use of Sanitation facilities	Toilet, tippy taps, sanitation stations	This is a shared facility on-site to ensure hygiene environment.
Inductions and Training	Record books, Pens, Posters,	Health and safety inductions done upon arrival on-site and refresher inductions done when staff return on-site for their new shifts.

10.5.3 WORKFORCE PROFILE

The CERC constructors will indicate their workforce profile as tabled below, as a way to keep records, and monitor health status of the workers:

Table 10.3: The workforce profile on construction site

Characteristics	No. of Workers	Key Activities
1. Region		
Local		
Another District		
International		
2. Accommodation		
On-Site Camp		
Home		
Rented		
Commuters using public transport		
3. Rotations		
21/7		
6/1		
2/5		
3/4		
4. Shifts		
8 hours		
4 hours		

5. Duration of Contracts		
Temporary Workers		
One Month		
Project Duration		
6. Underlying Health Issues		
Sugar Diabetes		
High Blood Pressure		
Asthma		
Others		
7. Visitors		
Suppliers		
RD Supervision team		
TICP Monitoring team		
World Bank		
Local Authorities		
Community Members		

10.5.4 IDENTIFIED POINTS OF INFECTION RISK

- Sharing of tools/equipment
- Performing activities in groups
- Taking attendance lists for inductions and toolbox talks and recording movement upon entry/exit
- Receiving and off-loading materials brought to site
- Sharing facilities such as toilets, GRM station, storage areas, water taps, accommodation area, etc.,
- More than one person riding on the same vehicle
- Returning to site after off days
- Interacting with community members during community engagement
- Hosting visitors on-site

10.5.5 MITIGATION MEASURES TO ADDRESS RISK DUE TO WORKFORCE PROFILE

- Conducting pre-employment health checks.
- Controlling entry and exit from site/workplace.
- Accommodation arrangements, (will there be any labour camps) to see if they are adequate and designed to reduce contact with the community.
- Reviewing contract durations, to reduce the frequency of workers entering/exiting the site.
- Rearranging work tasks or reducing numbers on the worksite to allow social/physical distancing, or rotating workers through a 24-hour schedule.
- Putting in place alternatives to direct contact, like live stream of instructions.

10.5.6 ROLES AND RESPONSIBILITIES

The construction team

Responsible for following all Health and Safety protocols at work place.

Security Guard

This officer will be responsible for the following tasks:

- Control of in and out movement of visitors into the Construction's site camp
- Record all the details of people accessing site and of those denied access.
- Ensure that there is only one entry/exit point to site such that no person shall enter unnoticed.

SHE Officer

The SHE officer shall ensure that every shift has a SHE repetitive who will be any of the employees on duty to be responsible for the following tasks:

- Ensure that all employees on duty abide by the proposed measures to deal with COVID 19 on site.
- Inform the SHE officer of any non-compliance among the employees.
- Inform the SHE officer of any shortage of essential supplies.

Stores Manager

The officer will be responsible for the following tasks:

- Keeping records of all tools/equipment safe in the storeroom.
- Ensure that every worker that takes or returns the equipment from/to the storeroom sanitizes it before.
- Sanitize surfaces of the storeroom where people are mostly likely to touch when they access stored goods.

Personnel

All staff members will be responsible for the following tasks:

- Keeping the work area hygienically safe;
- Reporting any unsafe working conditions regarding COVID 19;
- Have a right to stop work if risk is not eliminated;
- Attend awareness trainings on COVID 19;
- Self-monitor themselves for COVID 19 symptoms;
- Report any suspected case of COVID 19 to the SHE representative.

10.5.7 GENERAL CONDUCT

All Personnel on-site will observe the following:

- DO NOT shake hands;
- MAINTAIN social distancing of at least 1m;
- ALWAYS wear a face mask on-site;
- WASH hands frequently with SOAP and RUNNING WATER;
- SANITIZE HANDS with alcohol based sanitizer if washing is impossible;
- USE **DISPOSABLE** masks;
- AVOID touching faces;
- MINIMIZE contact with non-work persons near the construction sites.

10.5.8 SHARED TOOLS/EQUIPMENT

- ***The construction team*** will ensure that small tools will be bought in quantities that will allow workers not to share, as much as possible;

- ***The store manager and SHE officer*** shall ensure that ***workers*** will sanitize all tools before use and storage. They will be sanitized using paper towel and alcohol based sanitizer;
- All tools will be sanitized at the end of the shift and stored sanitized;
- All used paper towels, masks or other medical wastes will be disposed of in the respective bin and handled as per ESMP guidelines;
- Any medical waste produced during the care of ill workers will be collected safely in designated containers or bags and treated and disposed of following relevant requirements (e.g., national, WHO).

10.5.9 GROUP ACTIVITIES

- Where possible, ***SHE officer***, in consultation with ***Site manager*** will reduce number of people engaged for activities such as welding and steel mounting failing which social distancing shall be practiced;
- Masks will be worn all the time during these group activities

10.5.10 ENTRY/EXIT CONTROL

- ***SHE officer*** will perform health checks (Screening questions (**section 10.5.20**)body temperature checks using **digital thermometer**, provision of PPE and sanitization and hand washing facilities supplied with soap) at the entry/exit point;
- All information collected will be recorded by one person (***assigned***) to avoid people signing using the same stationery;
- A suspected person will not be allowed entry to site but send to a health facility for further testing;
- ***Employees*** will maintain a 1m Social Distance while queuing up for screening;
- Entry to site will be limited to employees, supervision teams, suppliers, local authorities and community members accessing the GRM box;
- Masks and relevant PPEs will be provided to **community members** accessing GRM boxes and other visitors to the site.

10.5.11 INDUCTIONS AND TOOLBOX TALKS

Inductions and toolbox talks should include daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.

During the daily briefings, reminding workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.

Training workers on hygiene and other preventative measures, and implementing a communication strategy for regular updates on COVID-19 related issues and the status of (any) affected workers.

The following personal should take due responsibilities during inductions and toolbox talks:

- ***SHE officer*** will undertake inductions and toolbox talks at an open assembly area to allow social distancing among employees;
- ***Employees*** will wear masks during these exercises, and practice social distancing;
- The ***SHE officer*** or one selected person will record attendance and the topic for the day;
- Daily assessment of previous day's Health and Safety issues, any resolutions and briefings on the COVID-19 protocols at construction sites- this should be undertaken by the construction team under supervision by the SHE officer.
- **Workers** should be encouraged to use existing GRM systems to report concerns related to COVID-19.

10.5.12 RECEIVING AND OFF-LOADING CONSTRUCTION MATERIALS

- Red heavy duty rubber gloves will be worn by ***labourers*** for off-loading, packing materials in storage and collecting materials for use during construction;
- Touching of faces will not be allowed when wearing gloves to avoid cross contamination;
- All gloves should be sanitized using paper towel immediately after off-loading;
- All employees must wash hands with water and soap after this activity;

10.5.13 SHARED FACILITIES

- ***SHE officer together with Site Manager,*** will set up hygiene stations next to every shared facility;
- All hygiene stations will have running water, soap, paper towel, hand sanitizer and waste bins;
- Storeroom door handles will be sanitized frequently by the ***Stores Manager.***

10.5.14 SHARED TRANSPORT

- ***The construction team*** will apply transport restrictions as outlined in Section 4 (Restrictions on transport) of Public Health (COVID-19) Regulations 2020: a sedan to carry 3 passengers, a 15 seater to carry 9 passengers, 22 seaters will carry 13 passengers, while 65 seaters will carry 35 passengers;
- All passengers will wear masks in transit;
- In the case of a private vehicle, the vehicle shall carry strictly one passenger, who shall be seated behind the front passenger seat;
- ***Drivers*** will be provided with hand sanitizers for passengers to be sanitized when accessing the vehicle

10.5.15 RETURNING TO SITE AFTER OFF DAYS

- ***The employees*** will be subjected to health screening immediately upon arrival on-site;
- The same procedures will be followed as per entry/exit protocol in (**Section 10.5.1.8)** above
- Special attention will be given to remind the new shifts about the General conduct (**Section 10.5.1.5**)on-site especially people who have been off site for a week

10.5.16 COMMUNITY ENGAGEMENT

- All participants in public gatherings will be provided with masks upon arrival, by the host;
- All participants will sanitize hands upon arrival;
- A social distance of 1m among participants will be maintained;

- Registration for recruitment will exclusively be done by facilitators.

10.5.17HOSTING VISITORS ON SITE

- All visitors will be subjected to health checks and recorded accordingly;
- ***The construction team*** will provide all visitors with face masks;
- ***SHE Officer /Security Guard*** will hand sanitize, and take temperatures of all visitors upon arrival;
- ***SHE Officer*** will give site inductions on COVID-19 to all visitors.

10.5.18 TRAINING AND COMMUNICATION WITH WORKERS

- ***SHE Officer*** should train ***employees*** on COVID 19 symptoms, virus pathways and protection measures, the use of PPE including the code of conduct;
- Training will be enhanced by graphics and the use of local language;
- ***Workers*** will be made aware of their responsibilities in implementing COVID 19 measures;
- The project efforts to combat COVID 19 will be clearly communicated to workers, their fears will be allayed, workers given a chance to ask questions and to express their concerns and make suggestions;
- ***Workers*** will be allowed to use the GRM/suggestion boxes installed on-site for assessment of efforts the construction team has implemented to prevent the spread of COVID 19.

10.5.19 COMMUNICATION WITH COMMUNITY

- ***The Contractor/CLO*** will provide community with clear, factual and easily understood communication on COVID 19;
- ***The Contractor/CLO*** will enlighten the community about every strategy they have put in place to prevent transmission from workers to the community;
- ***The Contractor/CLO*** will ensure that all members of the community are well informed including the marginalized groups such as the disabled, children, the elderly and women on COVID 19 protocols relation to construction at their area.

10.5.20 INSTANCES OF COVID 19 CASES

Worker with symptoms = stop working and be isolated

↓

Test onsite or off site

↓

Positive results = continue isolation (provide transport to home)

↓

Disinfect all work areas and tools the worker has used

↓

Isolate Co-workers and Family

↓

Continue the salary during illness or isolation

10.5.20 HEALTH SCREENING QUESTIONS

1. Is the person presenting with fever, new onset of cough, worsening chronic cough, shortness of breath or difficulty breathing?

2. Did the person have closed contact with anyone with acute respiratory illness or travelled outside of Lesotho in the past 14 days?

3. Does the person have a confirmed case of COVID-19 or had close contact with a confirmed case of COVID-19?

4. Does the person have two (2) or more of the following symptoms*: sore throat, hoarse voice, difficulty swallowing, decrease or loss of sense of taste or smell, chills, headaches, unexplained fatigue/malaise, diarrhoea, abdominal pain, nausea/vomiting, Pink eye (conjunctivitis), runny nose/sneezing without other known cause, or nasal congestion without other known cause?

5. If the person is over 65 years of age, are they experiencing any of the following symptoms: delirium, unexplained or increased number of falls, acute functional decline, or worsening of chronic conditions?

- *If **YES** to **ANY** Question – patient screened **POSITIVE***
- *If **NO** to **ALL** Questions – patient screened **NEGATIVE***

If POSITIVE follow **Section 10.5.19** of the protocol.

If NEGATIVE continue to work, and follow COVID 19 Protocols.

10.5.21 SETTING UP HYGIENE STATIONS

- All hygiene stations will have paper towels, alcohol based sanitizers, soap, running water and closed bins;
- All stations will be monitored on routine basis by the ***SHE officer*** to ensure continued supply of the essentials.

10.5.22 DECLARING PROJECT SHUTDOWN

- ***The construction team*** shall monitor the infection rate on daily basis;
- The project will shut down when there are 1 out of every 10 people are tested positive (This number will need to be confirmed with the nearest Health Centre)

10.5.23 PROTOCOL TO TRANSPORT A SICK PERSON

(The contractor will establish this protocol working with the nearest health facility)

10.5.24 WASTE DISPOSAL

- Waste from hygiene station will be treated as medical waste secured in closed bins;
- Gloves will be worn when bins are emptied and the gloves disposed of immediately;
- All waste from these bins will be tied into a heavy duty garbage bag until it is taken off-site for disposal (disposal can be arranged with a local health centre)

10.5.25 REQUIRED RESOURCES

- **Face Masks**: disposable and breathable **surgical** masks are recommended considering the nature of construction work. Disposable masks ensure personal

hygiene when replaced on daily basis. The masks should preferably be breathable for enhanced breathing comfort given the hectic nature of construction activities.

- **Hygiene stations**. There should be at least 4 stations: 1 – entry/exit point, 2 – toilets, 3 – Storeroom and 4 – Work area.
- **Hand Sanitizer**: a sanitizer of at least 70% alcohol base is recommended**;**
- **Gloves**: it is recommended that the usual heavy duty red rubber gloves that the Contractors provides as part of PPE package can be used to protect people during off-loading materials for suppliers. It is believed that disposable surgical latex gloves will not be durable considering the nature of construction materials. However, the Contractors can still have them to be used for waste disposal and other activities deemed doable with this type**;**
- **Paper Towel**: It is recommended that the Contractors buys KIMBERLY-CLARK Kleenex Heavy Duty paper towel rolls or their equivalent**;**
- **Soap**: an antibacterial liquid hand wash is recommended**;**
- **Digital Thermometer**: a digital infrared forehead non-contact thermometer is required**;**
- **Running Water**: the Contractors needs to come up with innovative ways they can have access to running water, such as tippy taps. It is also suggested that they design metal or wood structures or frames that can hold 20l containers of water, places a bottle of hand wash and sanitizer as well as dispense paper towels.

10.6 COMMUNITY ENGAGEMETN AND SENSITISIONS ACTIVITIES

Photo 21: Mahloenyeng – Gideon community sensitisations by LENASO, and RD

Photo 22: GBV/HIV/AIDs training workshop for CERC contractors, and lot 3 CLOs by LENASO, and RD

10.7 CONTRACTOR CODE OF CONDUCT

A. GENERAL TERMS

The Code of Conduct contains the policies that relate to the legal and ethical standards of conduct that we expect the contractor staff to comply with while carrying out their duties and responsibilities on behalf of the client. Compliance with these principles is a condition of employment or engagement with the contractor.

We acknowledge that the Code of Conduct cannot anticipate every situation contractor staff may face. We therefore expect contractor staff to apply with the Code of Conduct in their activities, to

exercise independent professional judgement and to deter wrong doing in the conduct of all duties and responsibilities on behalf of the Client.

REPORTING OF ILLEGAL OR UNETHICAL BEHAVIOUR

Contractor staff should promote ethical behaviour and encourage other members to talk to supervisors or other appropriate personnel when in doubt about the best course of action in a particular situation. We require that any incidence of misconduct, conflict of interest, or illegal activity be reported to contractor. All issues reported are confidential and will be treated seriously and discreetly. Contractor staff may report anonymously should that be their preference. RD will not allow retaliation for reports made in good faith.

AMENDMENTS AND WAIVERS

Any amendments to or waiver of this Code of Conduct shall be made only by the RD upon the recommendation of the TICP. If an amendment to or waiver of this Code of Conduct is made or granted, appropriate disclosure will be made as required by applicable laws.

I. ETHICS

BUSINESS INTEGRITY

The contractor conducts its business free from corruption or fraud and expects the same from its contractor staff. Contractors, and their staff do not receive or offer tangible or intangible bribes in any form.

CONFLICTS OF INTEREST

All contractor staff should avoid conflicts of interest between themselves and the client (RD). A "conflict of interest" can occur when the private interest of a contractor staff interferes in any way – or even appears to interfere – with the interests of RD as a whole.

Contractor staff are therefore prohibited from (a) taking for themselves personally opportunities that are discovered through the use of RD property, information or position, and (b) using RD property, information or position for personal gain,.

CONFIDENTIAL INFORMATION

Contractor staff should maintain the confidentiality of information entrusted to them by the RD or other project stakeholders, except when disclosure is authorized or legally mandated. "Confidential

information" includes all non-public information that might be of use to stakeholders, or harmful to RD or its stakeholders, if disclosed.

COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Contractor staff should comply with the laws, rules and regulations applicable to RD.

The laws, rules and regulations applicable to contracting with government entities are complex and may impose different and special requirements on RD. Failure to comply with these requirements may be a criminal offence. Contractors should comply with these requirements and questions regarding compliance should be referred to appropriate personnel.

PROTECTION AND PROPER USE OF COMPANY ASSETS

Contractors should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on RD effectiveness. RD assets should be used for legitimate project purposes, and on agreed terms.

II. EXCELLENCE

RELATIONSHIPS WITH OTHER PARTIES

Contractors should endeavour to deal fairly with all stakeholders especially the local villagers. None should take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

HARASSMENT, BULLYING AND DISCRIMINATION

Contractor staff are expected to treat all individuals with respect, tolerance, dignity and without prejudice to create a mutually respectful and positive working environment. RD will not tolerate any form of harassment or bullying.

ACCOUNTABILITY

Contractor staff are each held accountable for Code of Conduct compliance with regard to issues within his or her control. Sanctions for a breach of this Code of Conduct shall be determined by the RD. Sanctions may include serious disciplinary action, suspension from work or dismissal, termination of contract, or other remedies all to the extent permitted by law and as deemed appropriate under the circumstances.

III. RESPONSIBILITY

PROTECTING THE ENVIRONMENT

The contractor is committed to being an environmental steward by implementing the best technology available where applicable to minimise its environmental footprint and promote sustainable business best practices.

HEALTH AND SAFETY

The contractor is committed providing a safe and healthy workplace and to educate and train each staff in safe work practices. No person shall be required or instructed to work in surroundings or under conditions that are unsafe or dangerous to his or her health. Each contractor staff must take responsibility to become aware of the hazards associated with their workplace and tasks they are to perform. Each member is responsible to complying with applicable safety requirements, wearing prescribed safety equipment, and preventing avoidable accidents. Each contractor staff has a duty to report workplace conditions or practices that pose a safety hazard or threaten the environment and to take reasonable actions to alleviate such risks.

COMMUNITY INVOLVEMENT

Contractor strives to cultivate a local identity in each of its host communities by employing local talent and setting global good corporate citizenship standards, all while respecting local sensitivities.

Contractor will regularly contribute to the economic and social development of its project communities, and expects all of its staff to promote human rights and respectful community involvement in the areas in which the construction operates.

B. INDIVIDUAL CODE OF CONDUCT

Individual Code of Conduct
Instructions: This Code of Conduct should be signed by each employee. It is the responsibility of the employer to ensure that the employee understand this code of conduct, before signing. And it is also the responsibility of the employer to guide the employee to adhere to this code of conduct, and provide evident of guiding actions taken, as when required by the TICP.

I, _____, acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the Project's occupational health and safety (OHS) requirements, and preventing Violence Against Children (VAC), Gender Based Violence (GBV), and understanding the requirements of this code of conduct is important.

I consider that failure to follow ESHS and OHS standards, or to partake in activities constituting VAC or GBV—be it on the work site, the work site surroundings, at workers' camps, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit GBV or VAC may be pursued if appropriate.

I agree that while working on the Project I will:

a. Consent to a background check in any place I have worked for more than six months.
b. Attend and actively partake in training courses related to ESHS, OHS, COVID-19 prevention, VAC and GBV as requested by my employer.
c. Will wear my personal protective equipment (PPE) at all times when at the work site or engaged in Project related activities, in particular if related to exposure to COVID-19.
d. Will follow all prevention measures relating to COVID-19, including (i) washing hands with water and soap before and after eating, when entering my work area, after sneezing/coughing, etc.; (ii) sneeze or cough on elbow and/or wash hands after sneezing/coughing; (iii) if feeling unwell or have symptoms of a cold, flu or any respiratory illness, inform manager immediately, stay at home and do not come to work.
e. Take all practical steps to implement the environmental and social safeguards requirement of this project as guided by the employer.
f. Implement OHS measures, as required by my employer and national laws.
g. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties at all times.
h. Treat women, children (persons under the age of 18), and men with respect regardless of ethnicity, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
i. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
j. Not sexually exploit or abuse Project beneficiaries and members of the surrounding communities.

k. Not engage in sexual harassment of work personnel and staff —for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature is prohibited: i.e. looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts.

l. Not engage in sexual favors —for instance, making promises of favorable treatment (i.e. promotion), threats of unfavorable treatment (i.e. loss of job) or payments in kind or in cash, dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.

m. Not use prostitution in any form at any time.

n. Not participate in sexual contact or activity with children under the age of 18—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.

o. Unless there is the full consent[13] by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered "non-consensual" within the scope of this Code.

p. Consider reporting through the GRM or to my manager any suspected or actual GBV by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With respect to children under the age of 18:

q. Bring to the attention of my manager the presence of any children on the construction site or engaged in hazardous activities.

r. Wherever possible, ensure that another adult is present when working in the proximity of children.

s. Not invite unaccompanied children unrelated to my family into my home or office, unless they are at immediate risk of injury or in physical danger.

t. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography

u. Refrain from physical punishment or discipline of children.

v. No hiring of children for any Project activity (no persons under the age of 18).

[13] **Consent** is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defence.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

w. Informal warning;

x. Formal warning;

y. Additional Training;

z. Loss of up to one week's salary;

aa. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;

bb. Termination of employment;

cc. Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety management plan. That I will avoid actions or behaviors that could be construed as VAC or GBV. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, VAC and GBV issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

10.8 GRIEVANCE REGISTER / LOG BOOK

GRIEVANCE REGISTER

Identifiers				About the PAP				About the Complaint						Method of Resolution	Escalation	Notes
Reference Number	Date Received	Investigating Officer	Date closed	Name & Surname	District	Village/Road Project	Reporting method (In Person, In writing, Telephonically/ Online)	Type of grievance (Service delivery, Administrative, staff conduct, Policy/Procedure, Other: to be specified)	Grievance Details	Outcome	Date outcome advised to complainant	If resolution was offered, indicate/accepted or 'not accepted'	Signature of Complainant	Methods of resolution/Action Recommended	Escalation of grievance (e.g. Internally or External review)	

10.9 INTERIM GUIDANCE ON COVID-19 VERSION 1: APRIL 7, 2020 1 ESF/SAFEGUARDS INTERIM NOTE: COVID-19 CONSIDERATIONS IN CONSTRUCTION/CIVIL WORKS PROJECTS

This note was issued on April 7, 2020 and includes links to the latest guidance as of this date (e.g. from WHO). Given the COVID-19 situation is rapidly evolving, when using this note it is important to check whether any updates to these external resources have been issued.

1. INTRODUCTION The COVID-19 pandemic presents Governments with unprecedented challenges. Addressing COVID-19 related issues in both existing and new operations starts with recognizing that this is not business as usual and that circumstances require a highly adaptive responsive management design to avoid, minimize and manage what may be a rapidly evolving situation. In many cases, we will ask Borrowers to use reasonable efforts in the circumstances, recognizing that what may be possible today may be different next week (both positively, because more supplies and guidance may be available, and negatively, because the spread of the virus may have accelerated). This interim note is intended to provide guidance to teams on how to support Borrowers in addressing key issues associated with COVID-19, and consolidates the advice that has already been provided over the past month. As such, it should be used in place of other guidance that has been provided to date. This note will be developed as the global situation and the Bank's learning (and that of others) develops. This is not a time when 'one size fits all'. More than ever, teams will need to work with Borrowers and projects to understand the activities being carried out and the risks that these activities may entail. Support will be needed in designing mitigation measures that are implementable in the context of the project. These measures will need to take into account capacity of the Government agencies, availability of supplies and the practical challenges of operations on-the-ground, including stakeholder engagement, supervision and monitoring. In many circumstances, communication itself may be challenging, where face-to-face meetings are restricted or prohibited, and where IT solutions are limited or unreliable. This note emphasizes the importance of careful scenario planning, clear procedures and protocols, management systems, effective communication and coordination, and the need for high levels of responsiveness in a changing environment. It recommends assessing the current situation of the project, putting in place mitigation measures to avoid or minimize the chance of infection, and planning what to do if either project workers become infected or the work force includes workers from proximate communities affected by COVID-19. In many projects, measures to avoid or minimize will need to be implemented at the same time as

dealing with sick workers and relations with the community, some of whom may also be ill or concerned about infection. Borrowers should understand the obligations that contractors have under their existing contracts (see Section 3), require contractors to put in place appropriate organizational structures (see Section 4) and develop procedures to address different aspects of COVID-19 (see Section 5).

2. CHALLENGES WITH CONSTRUCTION/CIVIL WORKS

Projects involving construction/civil works frequently involve a large work force, together with suppliers and supporting functions and services. The work force may comprise workers from international, national, regional, and local labor markets. They may need to live in on-site accommodation, lodge within communities close to work sites or return to their homes after work.

There may be different contractors permanently present on site, carrying out different activities, each with their own dedicated workers. Supply chains may involve international, regional and national suppliers facilitating the regular flow of goods and services to the project (including supplies essential to the project such as fuel, food, and water). As such there will also be regular flow of parties entering and exiting the site; support services, such as catering, cleaning services, equipment, material and supply deliveries, and specialist sub-contractors, brought in to deliver specific elements of the works.

Given the complexity and the concentrated number of workers, the potential for the spread of infectious disease in projects involving construction is extremely serious, as are the implications of such a spread. Projects may experience large numbers of the work force becoming ill, which will strain the project's health facilities, have implications for local emergency and health services and may jeopardize the progress of the construction work and the schedule of the project. Such impacts will be exacerbated where a work force is large and/or the project is in remote or under-serviced areas. In such circumstances, relationships with the community can be strained or difficult and conflict can arise, particularly if people feel they are being exposed to disease by the project or are having to compete for scarce resources. The project must also exercise appropriate precautions against introducing the infection to local communities.

3. DOES THE CONSTRUCTION CONTRACT COVER THIS SITUATION?

Given the unprecedented nature of the COVID-19 pandemic, it is unlikely that the existing construction/civil works contracts will cover all the things that a prudent contractor will need to

do. Nevertheless, the first place for a Borrower to start is with the contract, determining what a contractor's existing obligations are, and how these relate to the current situation.

The obligations on health and safety will depend on what kind of contract exists (between the Borrower and the main contractor; between the main contractors and the sub-contractors). It will differ if the Borrower used the World Bank's standard procurement documents (SPDs) or used national bidding documents. If a FIDIC document has been used, there will be general provisions relating to health and safety. For example, the standard FIDIC, Conditions of Contract for Construction (Second Edition 2017), which contains no 'ESF enhancements', states (in the General Conditions, clause 6.7) that the Contractor will be required:

- to take all necessary precautions to maintain the health and safety of the Contractor's Personnel
- to appoint a health and safety officer at site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and or work on the site and to take protective measures to prevent accidents
- to ensure, in collaboration with local health authorities, that medical staff, first aid facilities, sick bay, ambulance services and any other medical services specified are available at all times at the site and at any accommodation
- to ensure suitable arrangements are made for all necessary welfare and hygiene requirements and for the prevention of epidemics

These requirements have been enhanced through the introduction of the ESF into the SPDs (edition dated July 2019). The general FIDIC clause referred to above has been strengthened to reflect the requirements of the ESF. Beyond FIDIC's general requirements discussed above, the Bank's Particular Conditions include a number of relevant requirements on the Contractor, including:

- to provide health and safety training for Contractor's Personnel (which include project workers and all personnel that the Contractor uses on site, including staff and other employees of the Contractor and Subcontractors and any other personnel assisting the Contractor in carrying out project activities)
- to put in place workplace processes for Contractor's Personnel to report work situations that are not safe or healthy

- gives Contractor's Personnel the right to report work situations which they believe are not safe or healthy, and to remove themselves from a work situation which they have a reasonable justification to believe presents an imminent and serious danger to their life or health (with no reprisal for reporting or removing themselves)
- requires measures to be in place to avoid or minimize the spread of diseases including measures to avoid or minimize the transmission of communicable diseases that may be associated with the influx of temporary or permanent contract-related labor
- to provide an easily accessible grievance mechanism to raise workplace concerns.

Where the contract form used is FIDIC, the Borrower (as the Employer) will be represented by the Engineer (also referred to in this note as the Supervising Engineer). The Engineer will be authorized to exercise authority specified in or necessarily implied from the construction contract. In such cases, the Engineer (through its staff on site) will be the interface between the PIU and the Contractor. It is important therefore to understand the scope of the Engineer's responsibilities. It is also important to recognize that in the case of infectious diseases such as COVID-19, project management – through the Contractor/subcontractor hierarchy – is only as effective as the weakest link. A thorough review of management procedures/plans as they will be implemented through the entire contractor hierarchy is important. Existing contracts provide the outline of this structure; they form the basis for the Borrower to understand how proposed mitigation measures will be designed and how adaptive management will be implemented, and to start a conversation with the Contractor on measures to address COVID-19 in the project.

4. WHAT PLANNING SHOULD THE BORROWER BE DOING?

Task teams should work with Borrowers (PIUs) to confirm that projects (i) are taking adequate precautions to prevent or minimize an outbreak of COVID-19, and (ii) have identified what to do in the event of an outbreak. Suggestions on how to do this are set out below:

- The PIU, either directly or through the Supervising Engineer, should request details in writing from the main Contractor of the measures being taken to address the risks. As stated in Section 3, the construction contract should include health and safety requirements, and these can be used as the basis for identification of, and requirements to implement, COVID-19 specific measures. The measures may be presented as a contingency plan, as an extension of the existing project emergency and preparedness plan or as standalone procedures. The measures may be reflected in revisions to the

project's health and safety manual. This request should be made in writing (following any relevant procedure set out in the contract between the Borrower and the contractor).

- In making the request, it may be helpful for the PIU to specify the areas that should be covered. This should include the items set out in Section 5 below and take into account current and relevant guidance provided by national authorities, WHO and other organizations. See the list of references in the Annex to this note.
- The PIU should require the Contractor to convene regular meetings with the project health and safety specialists and medical staff (and where appropriate the local health authorities), and to take their advice in designing and implementing the agreed measures.
- Where possible, a senior person should be identified as a focal point to deal with COVID-19 issues. This can be a work supervisor or a health and safety specialist. This person can be responsible for coordinating preparation of the site and making sure that the measures taken are communicated to the workers, those entering the site and the local community. It is also advisable to designate at least one back-up person; in case the focal point becomes ill; that person should be aware of the arrangements that are in place.
- On sites where there are a number of contractors and therefore (in effect) different work forces, the request should emphasize the importance of coordination and communication between the different parties. Where necessary, the PIU should request the main contractor to put in place a protocol for regular meetings of the different contractors, requiring each to appoint a designated staff member (with back up) to attend such meetings. If meetings cannot be held in person, they should be conducted using whatever IT is available. The effectiveness of mitigation measures will depend on the weakest implementation, and therefore it is important that all contractors and sub-contractors understand the risks and the procedure to be followed.
- The PIU, either directly or through the Supervising Engineer, may provide support to projects in identifying appropriate mitigation measures, particularly where these will involve interface with local services, in particular health and emergency services. In many cases, the PIU can play a valuable role in connecting project representatives with local Government agencies, and helping coordinate a strategic response, which takes

into account the availability of resources. To be most effective, projects should consult and coordinate with relevant Government agencies and other projects in the vicinity.

- Workers should be encouraged to use the existing project grievance mechanism to report concerns relating to COVID-19, preparations being made by the project to address COVID-19 related issues, how procedures are being implemented, and concerns about the health of their co-workers and other staff.

5. WHAT SHOULD THE CONTRACTOR COVER?

The Contractor should identify measures to address the COVID-19 situation. What will be possible will depend on the context of the project: the location, existing project resources, availability of supplies, capacity of local emergency/health services, the extent to which the virus already exist in the area. A systematic approach to planning, recognizing the challenges associated with rapidly changing circumstances, will help the project put in place the best measures possible to address the situation. As discussed above, measures to address COVID-19 may be presented in different ways (as a contingency plan, as an extension of the existing project emergency and preparedness plan or as standalone procedures). PIUs and contractors should refer to guidance issued by relevant authorities, both national and international (e.g. WHO), which is regularly updated (see sample References and links provided in the Annex).

Addressing COVID-19 at a project site goes beyond occupational health and safety, and is a broader project issue which will require the involvement of different members of a project management team. In many cases, the most effective approach will be to establish procedures to address the issues, and then to ensure that these procedures are implemented systematically. Where appropriate given the project context, a designated team should be established to address COVID-19 issues, including PIU representatives, the Supervising Engineer, management (e.g. the project manager) of the contractor and sub-contractors, security, and medical and OHS professionals. Procedures should be clear and straightforward, improved as necessary, and supervised and monitored by the COVID-19 focal point(s). Procedures should be documented, distributed to all contractors, and discussed at regular meetings to facilitate adaptive management. The issues set out below include a number that represent expected good workplace management but are especially pertinent in preparing the project response to COVID-19.

a) ASSESSING WORKFORCE CHARACTERISTICS

Many construction sites will have a mix of workers e.g. workers from the local communities; workers from a different part of the country; workers from another country. Workers will be

employed under different terms and conditions and be accommodated in different ways. Assessing these different aspects of the workforce will help in identifying appropriate mitigation measures:

- The Contractor should prepare a detailed profile of the project work force, key work activities, schedule for carrying out such activities, different durations of contract and rotations (e.g. 4 weeks on, 4 weeks off).
- This should include a breakdown of workers who reside at home (i.e. workers from the community), workers who lodge within the local community and workers in on-site accommodation. Where possible, it should also identify workers that may be more at risk from COVID-19, those with underlying health issues or who may be otherwise at risk.
- Consideration should be given to ways in which to minimize movement in and out of site. This could include lengthening the term of existing contracts, to avoid workers returning home to affected areas, or returning to site from affected areas.
- Workers accommodated on site should be required to minimize contact with people near the site, and in certain cases be prohibited from leaving the site for the duration of their contract, so that contact with local communities is avoided.
- Consideration should be given to requiring workers lodging in the local community to move to site accommodation (subject to availability) where they would be subject to the same restrictions.
- Workers from local communities, who return home daily, weekly or monthly, will be more difficult to manage. They should be subject to health checks at entry to the site (as set out above) and at some point, circumstances may make it necessary to require them to either use accommodation on site or not to come to work.

b) ENTRY/EXIT TO THE WORK SITE AND CHECKS ON COMMENCEMENT OF WORK

Entry/exit to the work site should be controlled and documented for both workers and other parties, including support staff and suppliers. Possible measures may include:

- Establishing a system for controlling entry/exit to the site, securing the boundaries of the site, and establishing designating entry/exit points (if they do not already exist). Entry/exit to the site should be documented.

- Training security staff on the (enhanced) system that has been put in place for securing the site and controlling entry and exit, the behaviors required of them in enforcing such system and any COVID - 19 specific considerations.
- Training staff who will be monitoring entry to the site, providing them with the resources they need to document entry of workers, conducting temperature checks and recording details of any worker that is denied entry.
- Confirming that workers are fit for work before they enter the site or start work. While procedures should already be in place for this, special attention should be paid to workers with underlying health issues or who may be otherwise at risk. Consideration should be given to demobilization of staff with underlying health issues.
- Checking and recording temperatures of workers and other people entering the site or requiring self-reporting prior to or on entering the site.
- Providing daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.
- During the daily briefings, reminding workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.
- Preventing a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or (if that is not possible) isolating such worker for 14 days.
- Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days.

c) GENERAL HYGIENE

Requirements on general hygiene should be communicated and monitored, to include:

- Training workers and staff on site on the signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular handwashing and social distancing) and what to do if they or other people have symptoms (for further information see WHO COVID-19 advice for the public).
- Placing posters and signs around the site, with images and text in local languages.

- Ensuring handwashing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places throughout site, including at entrances/exits to work areas; where there is a toilet, canteen or food distribution, or provision of drinking water; in worker accommodation; at waste stations; at stores; and in common spaces. Where handwashing facilities do not exist or are not adequate, arrangements should be made to set them up. Alcohol based sanitizer (if available, 60-95% alcohol) can also be used.
- Review worker accommodations, and assess them in light of the requirements set out in IFC/EBRD guidance on Workers' Accommodation: processes and standards, which provides valuable guidance as to good practice for accommodation.
- Setting aside part of worker accommodation for precautionary self-quarantine as well as more formal isolation of staff who may be infected (see paragraph (f)).

d) CLEANING AND WASTE DISPOSAL

Conduct regular and thorough cleaning of all site facilities, including offices, accommodation, canteens, common spaces. Review cleaning protocols for key construction equipment (particularly if it is being operated by different workers). This should include:

- Providing cleaning staff with adequate cleaning equipment, materials and disinfectant.
- Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas.
- Where it is anticipated that cleaners will be required to clean areas that have been or are suspected to have been contaminated with COVID-19, providing them with appropriate PPE: gowns or aprons, gloves, eye protection (masks, goggles or face screens) and boots or closed work shoes. If appropriate PPE is not available, cleaners should be provided with best available alternatives.
- Training cleaners in proper hygiene (including handwashing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials).
- Any medical waste produced during the care of ill workers should be collected safely in designated containers or bags and treated and disposed of following relevant requirements (e.g., national, WHO). If open burning and incineration of medical wastes is necessary, this should be for as limited a duration as possible.

Waste should be reduced and segregated, so that only the smallest amount of waste is incinerated (for further information see WHO interim guidance on water, sanitation and waste management for COVID-19).

e) ADJUSTING WORK PRACTICES Consider changes to work processes and timings to reduce or minimize contact between workers, recognizing that this is likely to impact the project schedule. Such measures could include:

- Decreasing the size of work teams.
- Limiting the number of workers on site at any one time.
- Changing to a 24-hour work rotation.
- Adapting or redesigning work processes for specific work activities and tasks to enable social distancing, and training workers on these processes.
- Continuing with the usual safety trainings, adding COVID-19 specific considerations. Training should include proper use of normal PPE. While as of the date of this note, general advice is that construction workers do not require COVID-19 specific PPE, this should be kept under review (for further information see WHO interim guidance on rational use of personal protective equipment (PPE) for COVID-19).
- Reviewing work methods to reduce use of construction PPE, in case supplies become scarce or the PPE is needed for medical workers or cleaners. This could include, e.g. trying to reduce the need for dust masks by checking that water sprinkling systems are in good working order and are maintained or reducing the speed limit for haul trucks.
- Arranging (where possible) for work breaks to be taken in outdoor areas within the site.
- Consider changing canteen layouts and phasing meal times to allow for social distancing and phasing access to and/or temporarily restricting access to leisure facilities that may exist on site, including gyms.
- At some point, it may be necessary to review the overall project schedule, to assess the extent to which it needs to be adjusted (or work stopped completely) to reflect

prudent work practices, potential exposure of both workers and the community and availability of supplies, taking into account Government advice and instructions.

f) PROJECT MEDICAL SERVICES Consider whether existing project medical services are adequate, taking into account existing infrastructure (size of clinic/medical post, number of beds, isolation facilities), medical staff, equipment and supplies, procedures and training. Where these are not adequate, consider upgrading services where possible, including:

- Expanding medical infrastructure and preparing areas where patients can be isolated. Guidance on setting up isolation facilities is set out in WHO interim guidance on considerations for quarantine of individuals in the context of containment for COVID-19). Isolation facilities should be located away from worker accommodation and ongoing work activities. Where possible, workers should be provided with a single well-ventilated room (open windows and door). Where this is not possible, isolation facilities should allow at least 1 meter between workers in the same room, separating workers with curtains, if possible. Sick workers should limit their movements, avoiding common areas and facilities and not be allowed visitors until they have been clear of symptoms for 14 days. If they need to use common areas and facilities (e.g. kitchens or canteens), they should only do so when unaffected workers are not present and the area/facilities should be cleaned prior to and after such use.
- Training medical staff, which should include current WHO advice on COVID-19 and recommendations on the specifics of COVID-19. Where COVID-19 infection is suspected, medical providers on site should follow WHO interim guidance on infection prevention and control during health care when novel coronavirus (nCoV) infection is suspected.
- Training medical staff in testing, if testing is available.
- Assessing the current stock of equipment, supplies and medicines on site, and obtaining additional stock, where required and possible. This could include medical PPE, such as gowns, aprons, medical masks, gloves, and eye protection. Refer to WHO guidance as to what is advised (for further information see WHO interim guidance on rational use of personal protective equipment (PPE) for COVID-19).
- If PPE items are unavailable due to world-wide shortages, medical staff on the project should agree on alternatives and try to procure them. Alternatives that may

commonly be found on constructions sites include dust masks, construction gloves and eye goggles. While these items are not recommended, they should be used as a last resort if no medical PPE is available.

- Ventilators will not normally be available on work sites, and in any event, intubation should only be conducted by experienced medical staff. If a worker is extremely ill and unable to breathe properly on his or her own, they should be referred immediately to the local hospital (see (g) below).
- Review existing methods for dealing with medical waste, including systems for storage and disposal (for further information see WHO interim guidance on water, sanitation and waste management for COVID-19, and WHO guidance on safe management of wastes from health-care activities).

g) LOCAL MEDICAL AND OTHER SERVICES Given the limited scope of project medical services, the project may need to refer sick workers to local medical services. Preparation for this includes:

- Obtaining information as to the resources and capacity of local medical services (e.g. number of beds, availability of trained staff and essential supplies).
- Conducting preliminary discussions with specific medical facilities, to agree what should be done in the event of ill workers needing to be referred.
- Considering ways in which the project may be able to support local medical services in preparing for members of the community becoming ill, recognizing that the elderly or those with pre-existing medical conditions require additional support to access appropriate treatment if they become ill.
- Clarifying the way in which an ill worker will be transported to the medical facility, and checking availability of such transportation.
- Establishing an agreed protocol for communications with local emergency/medical services.
- Agreeing with the local medical services/specific medical facilities the scope of services to be provided, the procedure for in-take of patients and (where relevant) any costs or payments that may be involved.

- A procedure should also be prepared so that project management knows what to do in the unfortunate event that a worker ill with COVID-19 dies. While normal project procedures will continue to apply, COVID-19 may raise other issues because of the infectious nature of the disease. The project should liaise with the relevant local authorities to coordinate what should be done, including any reporting or other requirements under national law. (h) INSTANCES OR SPREAD OF THE VIRUS WHO provides detailed advice on what should be done to treat a person who becomes sick or displays symptoms that could be associated with the COVID-19 virus (for further information see WHO interim guidance on infection prevention and control during health care when novel coronavirus (nCoV) infection is suspected). The project should set out risk-based procedures to be followed, with differentiated approaches based on case severity (mild, moderate, severe, critical) and risk factors (such as age, hypertension, diabetes) (for further information see WHO interim guidance on operational considerations for case management of COVID-19 in health facility and community). These may include the following:
- If a worker has symptoms of COVID-19 (e.g. fever, dry cough, fatigue) the worker should be removed immediately from work activities and isolated on site.
- If testing is available on site, the worker should be tested on site. If a test is not available at site, the worker should be transported to the local health facilities to be tested (if testing is available).
- If the test is positive for COVID-19 or no testing is available, the worker should continue to be isolated. This will either be at the work site or at home. If at home, the worker should be transported to their home in transportation provided by the project.
- Extensive cleaning procedures with high-alcohol content disinfectant should be undertaken in the area where the worker was present, prior to any further work being undertaken in that area. Tools used by the worker should be cleaned using disinfectant and PPE disposed of.
- Co-workers (i.e. workers with whom the sick worker was in close contact) should be required to stop work, and be required to quarantine themselves for 14 days, even if they have no symptoms. INTERIM GUIDANCE ON COVID-19 VERSION 1: APRIL 7, 2020 10

- Family and other close contacts of the worker should be required to quarantine themselves for 14 days, even if they have no symptoms.
- If a case of COVID-19 is confirmed in a worker on the site, visitors should be restricted from entering the site and worker groups should be isolated from each other as much as possible.
- If workers live at home and has a family member who has a confirmed or suspected case of COVID 19, the worker should quarantine themselves and not be allowed on the project site for 14 days, even if they have no symptoms.
- Workers should continue to be paid throughout periods of illness, isolation or quarantine, or if they are required to stop work, in accordance with national law.
- Medical care (whether on site or in a local hospital or clinic) required by a worker should be paid for by the employer. (i) CONTINUITY OF SUPPLIES AND PROJECT ACTIVITIES Where COVID-19 occurs, either in the project site or the community, access to the project site may be restricted, and movement of supplies may be affected.
- Identify back-up individuals, in case key people within the project management team (PIU, Supervising Engineer, Contractor, sub-contractors) become ill, and communicate who these are so that people are aware of the arrangements that have been put in place.
- Document procedures, so that people know what they are, and are not reliant on one person's knowledge.
- Understand the supply chain for necessary supplies of energy, water, food, medical supplies and cleaning equipment, consider how it could be impacted, and what alternatives are available. Early pro-active review of international, regional and national supply chains, especially for those supplies that are critical for the project, is important (e.g. fuel, food, medical, cleaning and other essential supplies). Planning for a 1-2 month interruption of critical goods may be appropriate for projects in more remote areas.
- Place orders for/procure critical supplies. If not available, consider alternatives (where feasible).

- Consider existing security arrangements, and whether these will be adequate in the event of interruption to normal project operations.
- Consider at what point it may become necessary for the project to significantly reduce activities or to stop work completely, and what should be done to prepare for this, and to re-start work when it becomes possible or feasible. (j) TRAINING AND COMMUNICATION WITH WORKERS Workers need to be provided with regular opportunities to understand their situation, and how they can best protect themselves, their families and the community. They should be made aware of the procedures that have been put in place by the project, and their own responsibilities in implementing them.
- It is important to be aware that in communities close to the site and amongst workers without access to project management, social media is likely to be a major source of information. This raises the importance of regular information and engagement with workers (e.g. through training, town halls, tool boxes) that emphasizes what management is doing to deal with the risks of COVID-19. Allaying fear is an important aspect of work force peace of mind and business continuity. Workers should be given an opportunity to ask questions, express their concerns, and make suggestions.
- Training of workers should be conducted regularly, as discussed in the sections above, providing workers with a clear understanding of how they are expected to behave and carry out their work duties.
- Training should address issues of discrimination or prejudice if a worker becomes ill and provide an understanding of the trajectory of the virus, where workers return to work.
- Training should cover all issues that would normally be required on the work site, including use of safety procedures, use of construction PPE, occupational health and safety issues, and code of conduct, taking into account that work practices may have been adjusted.
- Communications should be clear, based on fact and designed to be easily understood by workers, for example by displaying posters on handwashing and social distancing, and what to do if a worker displays symptoms.

h) COMMUNICATION AND CONTACT WITH THE COMMUNITY

Relations with the community should be carefully managed, with a focus on measures that are being implemented to safeguard both workers and the community. The community may be concerned about the presence of non-local workers, or the risks posed to the community by local worker's presence on the project site. The project should set out risk-based procedures to be followed, which may reflect WHO guidance (for further information see WHO Risk Communication and Community Engagement (RCCE) Action Plan Guidance COVID-19 Preparedness and Response). The following good practice should be considered:

- Communications should be clear, regular, based on fact and designed to be easily understood by community members.
- Communications should utilize available means. In most cases, face-to-face meetings with the community or community representatives will not be possible. Other forms of communication should be used; posters, pamphlets, radio, text message, electronic meetings. The means used should take into account the ability of different members of the community to access them, to make sure that communication reaches these groups.
- The community should be made aware of procedures put in place at site to address issues related to COVID-19. This should include all measures being implemented to limit or prohibit contact between workers and the community. These need to be communicated clearly, as some measures will have financial implications for the community (e.g. if workers are paying for lodging or using local facilities). The community should be made aware of the procedure for entry/exit to the site, the training being given to workers and the procedure that will be followed by the project if a worker becomes sick.
- If project representatives, contractors or workers are interacting with the community, they should practice social distancing and follow other COVID-19 guidance issued by relevant authorities, both national and international (e.g. WHO).

6. EMERGENCY POWERS AND LEGISLATION Many Borrowers are enacting emergency legislation. The scope of such legislation, and the way it interacts with other legal requirements, will vary from country to country. Such legislation can cover a range of issues, for example:

- Declaring a public health emergency
- Authorizing the use of police or military in certain activities (e.g. enforcing curfews or restrictions on movement)
- Ordering certain categories of employees to work longer hours, not to take holiday or not to leave their job (e.g. health workers)
- Ordering non-essential workers to stay at home, for reduced pay or compulsory holiday

Except in exceptional circumstances (after referral to the World Bank's Operations Environmental and Social Review Committee (OESRC)), projects will need to follow emergency legislation to the extent that these are mandatory or advisable. It is important that the Borrower understands how mandatory requirements of the legislation will impact the project. Teams should require Borrowers (and in turn, Borrowers should request Contractors) to consider how the emergency legislation will impact the obligations of the Borrower set out in the legal agreement and the obligations set out in the construction contracts. Where the legislation requires a material departure from existing contractual obligations, this should be documented, setting out the relevant provisions.

WHO Guidance

Advice for the public

WHO advice for the public, including on social distancing, respiratory hygiene, self-quarantine, and seeking medical advice, can be consulted on this WHO website:
https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public

Technical guidance

Infection prevention and control during health care when novel coronavirus (nCoV) infection is suspected, issued on 19 March 2020

Coronavirus disease (COVID-19) outbreak: rights, roles and responsibilities of health workers, including
key considerations for occupational safety and health, issued on 18 March 2020

Risk Communication and Community Engagement (RCCE) Action Plan Guidance COVID-19 Preparedness

and Response, issued on 16 March 2020

Considerations for quarantine of individuals in the context of containment for coronavirus disease (COVID-19), issued on 19 March 2020

Operational considerations for case management of COVID-19 in health facility and community, issued
on 19 March 2020

Rational use of personal protective equipment for coronavirus disease 2019 (COVID-19), issued on 27
February 2020

Getting your workplace ready for COVID-19, issued on 19 March 2020

Water, sanitation, hygiene and waste management for COVID-19, issued on 19 March 2020

Safe management of wastes from health-care activities issued in 2014

Advice on the use of masks in the community, during home care and in healthcare settings in the context of the novel coronavirus (COVID-19) outbreak, issued on March 19, 2020

ILO GUIDANCE

ILO Standards and COVID-19 FAQ, issued on March 23, 2020 (provides a compilation of answers to most
frequently asked questions related to international labor standards and COVID-19)

MFI GUIDANCE

IDB Invest Guidance for Infrastructure Projects on COVID-19: A Rapid Risk Profile and Decision Framework
KfW DEG COVID-19 Guidance for employers, issued on 31 March 2020
CDC Group COVID-19 Guidance for Employers, issued on 23 March 2020

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