Initial Environmental Examination

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Bhutan: Green and Resilient Affordable Housing Sector Project – Drungpa Residence Site, Phuentsholing

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CURRENCY EQUIVALENTS

(as of 20 August 2021)

Currency unit – Bhutanese Ngultrum (Nu)

Nu1.00 = \$0.01 \$1.00 = Nu74.43

ABBREVIATIONS

ADB - Asian Development Bank

AIDS - acquired immunodeficiency syndrome

BBR - Bhutan Building Regulation

BOQ - Bill of Quantities

BPC - Bhutan Power Corporation

CA - Competent Authority
COVID-19 - corona virus disease

DCR - Development Control Regulation

DDMC - Dzongkhag Disaster Management Committee

DEC - District Environment Committee

DOFPS - Department of Forest and Park Services

DYT - Dzongkhag YargayTshogdue

EA - executing agency

EC - environmental clearance

EIA - environmental impact assessment
EMP - environmental management plan
FNCA - Forest and Nature Conservation Act
FNCR - Forest and Nature Conservation Rules

FYP - Five-year Plan

GBV - gender-based violence

GRC - Grievance Redress Committee
GRM - grievance redress mechanism

HEMC - Health Emergency Management Committee

HIV - human immunodeficiency virus
IEE - initial environmental examination
MOAF - Ministry of Agriculture and Forest

MOF - Ministry of Finance

MOLHR - Ministry of Labor and Human Resources
MOWHS - Ministry of Works and Human Settlement

NC19TF - National COVID-19 Task Force

NDMA - National Disaster Management Authority

NEC - National Environment Commission

NECS - National Environment Commission Secretariat

NEPA - National Environment Protection Act

NGO - nongovernment organization

NHDCL - National Housing Development Corporation Limited

NKRA - National Key Result Area

NIOSH - National Institute of Occupational Safety and Health

NLCS - National Land Commission Secretariat

NMC - National Mushroom Centre

NRDCL - Natural Resources Development Corporation Limited

NSB - National Statistical Bureau

NCWC - National Commission for Women and Children

OHS - occupational health and safety
O&M - operation and maintenance

PAVA - Property Assessment and Evaluation Agency

PIC - project implementation consultant
PIU - project implementation unit
PMU - project management unit
PPE - personal protective equipment
PSC - Project Steering Committee
REA - rapid environmental assessment

RECOP - Regulation for Environmental Clearance of Projects

RGOB - Royal Government of Bhutan
SDG - sustainable development goal
SOP - standard operating procedure
SPS - safeguard policy statement
WHO - World Health Organization

WEIGHTS AND MEASURES

km - kilometer m - meter

km² - square kilometer m² - square meter

NOTE

In this report, "\$" refers to United States dollar.

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EXECUTIVE SUMMARY

The Green and Resilient Affordable Housing Sector Project (GRAHSP) will assist the Royal Government of Bhutan (RGOB) establish infrastructures (i.e., shelters and recycled waste livelihood facilities) and provide services [i.e., business development, child care centers (crèches), integrated services for survivors of gender based violence] for vulnerable women (victims/survivors of violence, poor working mothers caring for children and marginalized informal sector workers) in target municipalities (*thromde*) while also incorporating climate adaption and disaster risk reduction in housing projects. The project will (i) serve as a strategic entry point towards transforming the current urban planning framework in Bhutan, within the broader context of livable cities aimed at achieving social development objectives, including Sustainable Development Goal 5 under the United Nations, (ii) demonstrate and institutionalize technology application in construction as a means to achieve sustainability and disaster-resilient human settlements; and (iii) show that collaboration between RGOB, municipalities, private land developers, and corporations is a key to development of a comprehensive and sustainable housing program.

Subproject Scope. This initial environmental examination (IEE) report has been prepared for Drungpa's Residence Site Subproject, which is one of the 9 subprojects to be financed under the project. This subproject involves construction of 4 five-storey residential buildings comprising of 96 units, with internal access road and parking. Expectedly, 96 families will benefit from this subproject, and this translates to an estimated 480 beneficiary citizens (i.e., approximately 5 members per family). This housing complex will be constructed within a 0.85-acre residential plot located in the current Drungpa's Residence area, in the center of Phuentsholing town. The table below summarizes in detail the components of the subproject.

Details of the Housing Complex (Drungpa, Phuentsholing)

SI. No.	Building Type	Number of Buildings	Total	Measurements
1	Category III (Type II)	1	24 units (1 Bldg. x 6 floors x 4 units)	Plinth area (1 st Floor): 389.9 m ² . (4,195.32 sq.ft.) Unit area: 97.48 m ² . (1,048.83 sq.ft)
2	Category IV (Type II)	1	24 units (1 Bldg. x 6 floors x 4 units)	Plinth Area (1 st Floor): 308.64 m² (3320.97 sq.ft) Unit Area: 77.16 m² (830.24 sq.ft)
3	1 BHK Building	2	48 units (2 Bldgs. x 6 floors x 4 units)	Plinth Area(1Floor): 220.7 m ² (2,374.73 sq.ft.) Unit Area: 55.19 m ² . (593.844 sq.ft.)
	Total	4	96	See details under description
	T =			
	Facilities		escription	Total Area
4	Internal road and parking	To fit 36 light veh wheelers	nicles and 22 2-	951.61 m ²

SI. No.	Building Type	Number of Buildings	Total	Measurements						
5	Other facilities	Other facilities								
	 Pedestrian 	Pedestrian footpath								
	Drinking water storage tanks									
	 Sub-station 	1								

Categorization. ADB requires the consideration of environmental issues in all aspects of ADB's operations, and the requirements for environmental assessment are described in ADB Safeguard Policy Statement (SPS), 2009. Initial step was to categorize the subproject based on its likely impacts of its most environmentally sensitive component(s) at all phases of implementation. Using ADB's Rapid Environmental Assessment checklist, the subproject is classified as Category B for Environment per ADB SPS as no significant impacts are envisaged. Accordingly, this IEE has been undertaken to assess in more detail the likely environmental impacts of the subproject and to provide an environmental management plan (EMP) specifying the required mitigation and monitoring measures to ensure that these impacts are managed to acceptable levels. This IEE also emphasizes the need to incorporate pollution prevention and control technologies during the design, construction, and operation of the subproject, and adhere to relevant national laws, rules and regulations, as well as internationally recognized standards such as the World Bank Group's Environment, Health and Safety Guidelines. With regard to national environmental assessment requirement, the Regulation for Environmental Clearance of Projects, 2016 (RECOP) provides the procedures for the categorization and issuance of environmental clearance for projects. Accordingly, the subproject is classified under RECOP as a Blue Category undertaking, and likewise requires the preparation of IEE by the proponent and subsequent approval by relevant competent authority prior to issuance of an environmental clearance.

Description of the Environment. The proposed site of the housing subproject is located in the center of Phuentsholing city, on government land that currently houses the Drungpa's residence. The site falls under the urban village, and is considered a built-up area with existing residential, commercial and institutional establishments around. It is also bounded by major roads in the city and provides convenient and easy access during the construction and operation phase (or when the housing complex is occupied by the recipient citizens).

The subproject site is neither within nor located adjacent any ecologically critical areas, and subproject development interventions will not have any significant impact on the physical, biological and social environment. This IEE has been conducted to evaluate any potential environmental impacts of the subproject and propose measures to mitigate these impacts, including monitoring.

Assessment of Environmental Impacts. Potential environmental impacts were identified on the basis of review and analysis of the primary and secondary data or information and stakeholder consultations, and field visits to the site. Impacts were identified in relation to the different phases of project implementation — pre-construction, construction, and operation of the built infrastructure. Evaluation of the likely degree of impacts has been done on each of identified potential impacts. Based on this evaluation, mitigation measures have been developed to reduce all negative impacts to acceptable levels. These were discussed with specialists and experts responsible for the engineering and environmental aspects.

In order to ensure that the assessment of impact is robust, a biodiversity assessment has been undertaken relative to the subproject location. The Integrated Biodiversity Assessment Tool (IBAT) was used to screen and assess potential risks on the protected areas or critical habitat

that may exist around the project site (default area of analysis of 50 km radius). Screening results show there no key biodiversity area (KBA) within 1 km from the subproject site, and that 34 IUCN Red List species of concern are identified within the default area of analysis. The IUCN Red List species of concern were assessed to determine the likelihood of them being found at the subproject site. Since the subproject site is already within the center of the city, the likelihood of these species being found at the site is very low. Nevertheless, the assessment included necessary written confirmation from the Department of Forest, which confirmed that none of these species are found or sighted at the subproject site. Accordingly, these species are found or dwell in the denser forest further and farther upslope of the site.

Environmental Management Plan. From the results of assessment of impacts and mitigation measures, an environmental management plan (EMP) has been developed and included as part of this IEE, which outlines the following: (i) mitigation measures for environmental impacts during implementation; and (ii) an environmental monitoring program, and the responsible entities for mitigating, monitoring, and reporting.

In order to ensure sound environmental management and safety during various phases of the implementation, the Contractor will be required to prepare a site-specific environmental management plan (SEMP) based on the EMP of this IEE. Contractor will submit its SEMP for approval to the project implementation unit (PIU). This will cover the following areas of impact which are potentially significant but can be mitigated by the adoption of good practice: (i) impedance of traffic, (ii) noise pollution and vibration, (iii) waste generation (iv) release of silt from excavations, (v) water pollution, (vi) air and dust pollution, (vii) community health and safety risks, and (viii) occupational health and safety.

The EMP and SEMP will (i) ensure that the activities are undertaken in a responsible non-detrimental manner; (ii) provide a pro-active, feasible, and practical working tool to enable the measurement and monitoring of environmental performance on site; (iii) guide and control the implementation of findings and recommendations of the environmental assessment conducted for the subproject; (iv) detail specific actions deemed necessary to assist in mitigating the environmental impact of the subproject; and (v) ensure that safety recommendations are complied with. Copies of the EMP and SEMP shall be kept on-site during the construction phase. The Contractor will be responsible for the organization, direction, and execution of environmental management related activities during construction of the proposed subproject. The Contractor will also undertake all activities in accordance with the relevant environmental requirements, including consent documentation and other regulatory and/or statutory and contractual requirements.

Grievance Redress Mechanism. The project will adopt a grievance redress mechanism (GRM) that shall be set up to register grievances of the people regarding technical, social and environmental aspects. The process will be designed to be transparent, gender responsive, culturally appropriate and commensurate to the risks and adverse impacts of the project, as well as readily accessible to all segments of the affected people. The project GRM will not supersede any legal government grievance procedures. Affected people are to be informed about the mechanism through media and public outlets. This participatory process shall ensure that all views of the people are adequately reviewed and suitably incorporated in the design and implementation process.

Implementation Arrangement. The executing and implementing agency is the National Housing Development Corporation Limited (NHDCL) of the Government of Bhutan. NHDCL will establish a project management unit (PMU) comprising officials including an Environmental Safeguard Officer who is a permanent employee of NHDCL. The PMU will be strengthened with external

experts or consultants in environmental and social safeguards, including experts on finance, procurement, technical areas, and contract management. PIUs will be established at the local level or municipalities where the subprojects under the project are located. For this subproject, NHDCL Phuentsholing will serve as the PIU. The PMU and PIUs will have responsibility for overseeing subproject management, including overseeing EMP implementation. The PMU will also have the responsibility for obtaining environmental clearance of the subproject from the relevant competent authority in compliance with RECOP.

The Contractor will be required to (i) obtain all other statutory clearances prior to commencement of civil works; (ii) establish an operational system for managing environmental impacts; (iii) prepare a SEMP based on the EMP of this IEE, and submit to PIU or PMU for approval; (iv) carry out all of the monitoring and mitigation measures set forth in the approved SEMP; and (v) implement any corrective or preventative actions set out in safeguards monitoring reports that the PMU will prepare from time to time to monitor implementation of this IEE, EMP, and SEMP. The Contractor shall allocate a budget for compliance with these EMP measures, requirements and actions.

Information Disclosure and Consultation. The project has undertaken meaningful consultations¹ during the project preparatory stage. The objectives of the consultations are to ensure that project information is accurately and properly disseminated to all stakeholders and engage them in the environmental assessment process, ensure all issues from the stakeholders about the project are considered in the environmental management planning and ultimately addressed in the EMP of the IEE. Meaningful consultations also provide valuable guidance and direction to safeguard the interests of the stakeholders, developers and the environment. Stakeholder engagement will be a continuing activity of the PMU throughout project implementation.

Written information and documents shall be disclosed at a location in which they can be easily accessed by stakeholders. This includes making draft environmental safeguards reports available for the public and providing a mechanism for the receipt of comments and making such documents available more widely by disclosing them on ADB and project websites. NHDCL through the PMU will submit to ADB the following documents for disclosure on ADB's website:² (i) the final IEE report; (ii) new or updated IEE reports and corrective action plan prepared during project implementation, if any; and (iii) semi-annual environmental monitoring reports.

PMU will provide relevant environmental information, including information from the relevant documents in a timely manner, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders. For illiterate people, other suitable communication methods will be used. For the benefit of the communities affected, the executive summary of the IEE will be translated in the local language and made available at the offices of PMU and Contractor, including satellite office of Contractor at the subproject site. Hard copies of

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¹ Per ADB SPS, meaningful consultation means a process that (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

² Per ADB SPS, 2009, prior to disclosure on ADB website, ADB reviews the "borrower's/client's social and environmental assessment and plans to ensure that safeguard measures are in place to avoid, wherever possible, and minimize, mitigate, and compensate for adverse social and environmental impacts in compliance with ADB's safeguard policy principles and Safeguard Requirements 1-4."

the IEE will be available in the PMU, and accessible to citizens as a means of disclosing the document and at the same time creating wider public awareness. On demand, the person seeking information can obtain a hard copy of the complete IEE document at the cost of photocopy from the office of the PMU.

Monitoring and Reporting. EMP compliance monitoring will be undertaken by the PMU, with support of external experts or consultants. Contractors will submit monthly reports to PMU. Consistent with reporting requirements set out in the Project Administration Manual, PMU will prepare and submit reports to ADB on a semi-annual basis. The submission of semi-annual environmental monitoring reports to ADB will continue until ADB issues a project completion report for the project.

Conclusion. The overall finding of this IEE is that the subproject will result in significant environmental benefits because of improved living condition of selected recipient citizens of Phuentsholing. The subproject is unlikely to cause significant adverse impacts because: (i) most of the subproject components involve straightforward construction, so impacts will be mainly localized; (ii) in most cases, the predicted impacts are likely to be associated with the construction process and are produced because of excavation, obstruction at specific construction locations, and earth movements; and (iii) being located mainly along roads and built-up area will not cause direct impact on terrestrial biodiversity values. The potential adverse impacts that are associated with construction can be mitigated to standard levels without difficulty through proper engineering practice and the incorporation or application of recommended mitigation measures and procedures in the EMP and SEMP. Consequently, the potential adverse impacts that are associated with the operation phase (i.e., the period when the housing facility is occupied by beneficiary citizens) can already be mitigated upfront through incorporation of environmental requirements in the detailed engineering design.

As such, no further environmental assessment is therefore required and the classification of Category B per ADB SPS is confirmed.

This IEE has been prepared based on preliminary designs of the subproject. If the design is revised or modified, the PMU shall update this draft IEE based on final detailed design and submit to ADB for review and disclosure. In compliance with the requirements of the RECOP, PMU shall obtain the necessary environmental clearance for the subproject from the relevant competent authority. No contract under the subproject shall be awarded until an environmental clearance covering said subproject is issued.

The approved updated IEE shall be treated as the final IEE and shall be attached in the bid and contract documents. No works can commence until (i) the final IEE approved by ADB is provided to the Contractor, and (ii) the SEMP prepared by the Contractor is approved by PIU or PMU. In the event of any design change during subproject implementation period, the IEE shall be updated to include assessment of impacts due to the design change, any corrective actions, associated cost and revised schedule.

I. INTRODUCTION

A. Background

- 1. Currently one third of the Bhutanese population live in urban centers and by 2037 this is expected to reach 50.4%. Urban areas also have higher number of urban poor who struggle to secure adequate housing at reasonable costs. An estimated 10% of Thimphu city's population lives in informal settlements. About a quarter of households (41,039) lacks access to improved sanitation and waste management is a concern as it does not reach every corner of the city. Most of the urban contract workers (cleaners, waste collectors, and semi-skilled workers) reside in informal squatter settlements in Thimphu and Phuentsholing as they are unable to afford decent housing elsewhere.³
- 2. Affordable housing is provided by the National Housing Development Corporation, an agency that was delinked from the Ministry of Works and Human Settlements (MOWHS). As per the directive of the government, NHDCL plans, designs and provides affordable housing. However, due to increasing demand, there are still many challenges of not being able to cater to the housing needs of the clients.
- 3. The proposed Bhutan Green and Resilient Affordable Housing Sector Project (GRAHSP) will deliver affordable housing in selected settlements in Bhutan. Improved livability, safety, and sustainability of human settlements through access to adequate affordable housing is a national priority.⁴ The project will also strengthen policies, institutions, and regulatory framework of the housing sector in Bhutan.
- 4. **Affordable housing needs**. Currently, there is poor availability of affordable housing in Bhutan, particularly in urban areas where demographic trends are increasingly putting pressure on the residential land and housing stock. About 63.5% of urban households rent and only 19% of households own houses in urban areas.⁵ As demand for serviced land and housing increases and the supply is unable to keep up, house prices and rents are also rising, making housing unaffordable for low-income households. Low-income civil servants who fall in income brackets ranging from Nu900 (\$12) to Nu3, 500 (\$50) per month are faced with rental stress, as they need to spend an estimated 40%–60% of their income on housing costs.⁶ Likewise, majority of the urban poor including low-income contract workers (noncivil servants) are currently forced to live in informal settlements as there is a lack of affordable formal housing supply that is accessible to them. As of 2017, there was an estimated shortfall of 21,156 units nationwide.⁷ Currently, many low-income households have no option but self-build housing in peri-urban areas or overcrowd in the existing housing (to share costs) and overload infrastructure services, finding accommodation in substandard housing in poorly located and under-served areas (informal settlements),⁸ or live

³ Ministry of Works and Human Settlement. 2016. National Report, The 3rd UN Conference on Housing and Sustainable Urban Development. Thimphu.

Government of Bhutan, Gross National Happiness Commission. 2019. <u>Twelfth Five-Year Plan, 2018–2023: Just, Harmonious and Sustainable Society through Enhanced Decentralization</u>. Thimphu. Affordable housing is defined as the ability for households to meet housing costs within 30% of gross monthly income.

⁵ Government of Bhutan, NSB. 2017. <u>Bhutan Living Standards Survey Report 2017</u>. Thimphu.

⁶ Government of Bhutan, NSB. 2017. <u>Bhutan Poverty Analysis Report 2017</u>. Thimphu. Civil servants are provided with rental housing allowance.

ADB. 2017. Housing Finance Feasibility Study. Consultant's report. Manila (SC107332); and ADB. 2018. Housing Finance Feasibility Study. Consultant's report. Manila (SC 107332).

⁸ Government of Bhutan, Ministry of Works and Human Settlement (MOWHS). 2016. <u>National Report: The 3rd UN Conference on Housing and Sustainable Development</u>. Thimphu.

in adjacent countries (footnote 3). Women are continuing to bear a disproportionate share of the burden and are vulnerable to housing insecurity exacerbated by overcrowding, which raises social pressures (e.g., domestic violence).

- 5. **ADB's intervention in the sector**. ADB has adopted a holistic approach in addressing the long-term housing sector needs in Bhutan. ADB provided assistance through a policy-based loan (PBL) under a programmatic approach to enable continuous reforms reflecting developments in the sector. The PBL subprogram 1, approved in 2019 for the financial market development program, supported the revision of the National Housing Policy (NHP) (footnote 10). In October 2020, PBL subprogram 2 was approved for developing a long-term strategy for public housing including fiscal measures and access to finance to women (footnote 10). The subprogram 3 under the PBL is planned for approval in 2021 and will support conducting a nationwide housing survey and implementing financing schemes using the survey results. The PBLs will strengthen financial sector institutions' capacity and develop nonfinancial institutions to deliver housing finance solutions. The proposed project, complemented by the PBL reforms, will support the government to (i) reduce the shortage of affordable housing which needs an urgent intervention; and (ii) create a robust medium- to long-term road map to achieve the policy objectives of the sector.
- 6. **Government policy**. Bhutan's Twelfth Five-Year Plan, 2018–2023 prioritizes the government's strategic thrust for economic stability, economic diversification, and poverty reduction, which includes a medium-term outlook for affordable housing provision (footnote 1). Recently, the government approved the NHP and the Strategy for Housing (2020) promoting a vision for universal access to safe and affordable housing. The NHP includes five core objectives, of which the following three stand out, namely to: (i) provide safe, affordable, and adequate rental housing for all; (ii) promote home ownership; and (iii) encourage partnership and cooperation among private and government entities in the provision of affordable housing. The policy's focus is on a multi-pronged approach to catalyze new investment including the release of land for housing infrastructure, making housing finance readily available to support economic development, and improve planning and policy coordination. Integrating these elements requires high levels of coordination and collaboration at the central government level, and among real estate developers, banks, and beneficiaries.

B. Developmental Impact, Outcome and Outputs of the Project

- 7. The project is aligned with the following impact: livability, safety, and sustainability of human settlements ensured (footnote 4). The project will have the following outcome: access to green and resilient affordable housing for low-income households improved.
- 8. Output 1. Climate- and disaster-resilient, energy-efficient, and affordable housing units and public facilities for low-income households constructed.¹³ Output 1 will support the NHDCL in building about 1,000 rental units, three integrated community service centers, and two recycled waste stations connected to services, in support of SDG 1. The government selected

⁹ At least 26% of urban households live in shared accommodation with basic infrastructure services (footnote 3).

¹² Government of Bhutan, MOWHS. 2020. Long Term Strategy for Housing. Thimphu.

ADB. 2019. Report and Recommendation of the President to the Board of Directors: Proposed Programmatic Approach and Policy-Based Loan for Subprogram 1 and Technical Assistance Grant to the Kingdom of Bhutan for Financial Market Development Program. Manila; and ADB. 2020. Report and Recommendation of the President to the Board of Directors: Proposed Programmatic Approach and Policy-Based Loan for Subprogram 2 and Technical Assistance Grant to the Kingdom of Bhutan for Financial Market Development Program. Manila.

¹¹ Government of Bhutan, MOWHS. 2020. *National Housing Policy*. Thimphu.

¹³ Resilient housing design incorporates climate change and disaster risk-reduction measures to avoid, minimize, and/or recover from a disaster in a timely and efficient manner.

high-priority investments as subprojects. 14 The increase in the supply of affordable rental housing is expected to immediately relieve the housing shortage and benefit lower-income civil servants (about 10%) and non-civil servants (about 90%), including marginalized municipal waste workers. The NHDCL will select beneficiaries most in need by applying beneficiary eligibility and selection criteria, with gender equality considered as part of the eligibility criteria as defined in the project administration manual (PAM). The building designs incorporate gender-inclusive features; enhanced safety against earthquake and fire hazards; and resource efficiency, making greater use of locally available materials. 15 The building structures will employ reinforced-concrete frames and innovative pre-engineered structures. The project design has identified and incorporated climate and disaster resilience features, considering multiple hazards. The project will support green building certification through the International Finance Corporation's Excellence in Design for Greater Efficiencies (EDGE) certification program. 16 The housing designs reflect local cultural heritage values and traditional architecture. 17 Additional subprojects will be selected during project implementation in line with the NHP using the eligibility criteria set out in the PAM.

- Output 2. Institutional capacities, policy, and regulatory framework of the housing sector strengthened. This output will (i) strengthen the NHDCL's housing design, construction, and management capacity—informed by climate and disaster risks and affordability considerations; (ii) review the building code and regulations; (iii) develop climate- and disasterresilient building designs and related solutions to improve safety, resource efficiency, and gender and disability inclusiveness; (iv) conduct awareness training and a capacity building program for key project stakeholders on climate- and disaster-resilient design and the building code; (v) enhance the NHDCL's business model, strengthening its O&M capacity, and developing partnerships with the private sector; (vi) strengthen the housing management information system of the MOWHS by expanding it to include tenancy data and better understand and prepare evidence-informed policy updates to address demand and supply-side bottlenecks in the sector; (vii) develop a gender and socially inclusive national homeownership strategy, including a rentto-own mechanism; and (viii) provide project implementation support, including supervision, and set up a safeguard unit in the NHDCL.
- 10. Due to the large demand of housing units in the country, NHDCL plans to carry out the construction in a phased manner with the project considered as "Phase 1" comprising of about 1,026 - 1,062 housing units spread over 9 subprojects in six dzongkhags (districts) and subdistricts. These are prioritized in terms of pressing demand and availability of land and funds. **Table 1** below shows a summary of the subprojects. Based on experiences under the project, subsequent phases may be planned by the government in the future.

Table 1: Proposed Subprojects

	Table 1.1 Toposed Subprojects									
	Location	District	Area (Acres)	Typology	Housing blocks	No. of Units	Service Centers			
1	Tading	Samtse	9.00	G+2	37/34	444/408				
	Amochu	Phuentsholing	0.98	G+5	5	120				
2	(Bangay)									
3	Rinchending	Phuentsholing	5	G+2	18	108	Yes			

¹⁴ Priority subprojects are located in Nganglam; Phuentsholing (Amochu, Rinchending and Drungpa's Residence); Samtse (Tading); Samdrup Jongkhar (Dradulthang and Toed); Thimphu (Semtoka); and Trashiyangtse.

¹⁵ The gender-inclusive considerations include a preference for households headed by women and tenancy agreements signed by both spouses. In addition, the service centers will include childcare facilities, shelter for women, and offers employment opportunities. The green features include insulated walls, improved windows, use of timber and stone. water-efficient faucets.

¹⁶ EDGE.

¹⁷ Government of Bhutan, MOWHS. 2014. *Bhutanese Architectural Guidelines*. Thimphu.

4	Drungpa Residence Area	Phuentsholing	0.85	G+5	4	96	
		Samdrup	0.8	G+3	4	32	
5	Dradulthang	Jongkhar					
	Samdrup	Samdrup	2	G+3	11	88	Yes
6	Jongkhar Toed	Jongkhar					
7	Nganglam	Pema Gatshel	2.82	G+1	8	32	
8	Semtokha	Thimphu	1.93	G+4	8	110	Yes
9	Trashiyangtse	Trashiyangtse	2.48	G+1	8	32	
			25.86		103/100	1,062/1,026	

C. Purpose of the IEE

- 11. The purpose of this IEE is to describe the assessment of environmental impacts due to the proposed housing subproject based on the detailed design produced under the project, and to specify measures to address impacts. This IEE is based on engineering design information, field visits, and primary and secondary data to characterize the environment. It contains the results of interviews and consultations with stakeholders. This IEE includes an environmental management plan (EMP) outlining mitigation measures and monitoring requirements, and environmental specifications to be appended to contract documents.
- 12. Screening using ADB's rapid environmental assessment checklist for urban development (Appendix 1) was initially conducted together with an accomplished No Mitigation Measures Scenario Checklist (Appendix 2), and results show that the subproject is unlikely to cause any significant adverse impacts, and therefore classified under Category B per ADB Safeguard Policy Statement (SPS), 2009. Thus, this initial environmental examination (IEE) has been prepared in accordance with ADB SPS2009 requirements for environment category B projects.
- 13. The subproject is consistent with the EARF of the project, which provides the selection criteria for future subprojects.

D. Methodology

- 14. The methodology used for the preparation of IEE is presented is as follows:
 - (i) Review of project-related documents and literature relevant to the project;
 - (ii) Site visits to the subproject site to review the existing environmental conditions and develop baseline information for the subproject area;
 - (iii) Consultation with NHDCL to discuss subproject components, benefits, and impacts;
 - (iv) Analysis of typical environmental impacts of subproject components and identification of suitable mitigation measures to mitigate potential impacts; and
 - (v) Review and develop institutional arrangements and capacity building needs for implementation of environmental management and monitoring.

E. Structure of the Report

- 15. The IEE is presented in twelve chapters as follows:
 - (i) Executive Summary. This chapter provides an overview and summary of the outcome of the IEE;

- (ii) Chapter 1. Introduction, which includes the Background, Outcome and Outputs of the Project, Purpose of the IEE, Methodology and Structure of the Report;
- (iii) Chapter 2. Policy Legal and Administrative Framework, which includes ADB Safeguard Policy statement, Environment Legislation Framework, National Environmental Act and Legislation, Legislation relating to Occupational Health and Safety, Relevant International Conventions and Treaties, Gaps in Legal and Guiding Instruments, Permits and Clearances and Applicable Environmental Standards;
- (iv) Chapter 3.Description of the Subproject, which focuses primarily on subproject location and area, subproject rationale, subproject alternatives, subproject development plan and subproject components, subproject phase, and schedule and resource utilization;
- (v) Chapter 4. Description of the Environment, which includes a description of the baseline information, subproject influence area, land environment, water environment, air environment, noise environment, ecological environment, socioeconomic environment, and physical and cultural resources;
- (vi) Chapter 5. Anticipated Environmental Impact and Mitigation Measures, which includes introduction, impact assessment, anticipated impacts and mitigation measures during pre-construction, construction and operation phases, cumulative impacts and mitigation, environmental benefits and enhancement measures, and a summary of impacts and mitigation;
- (vii) Chapter 6. Analysis of Alternatives, which discusses how the alternatives were assessed in terms of site location, design and technology, environmental implications of alternatives, including implication of No-Project alternative
- (viii) Chapter 7. Information, Disclosure, Consultation and Participation, which details the process and the approach and methodology for preliminary consultations, and discusses future consultations during detailed design stage and information disclosure;
- (ix) Chapter 8. Grievance Redress Mechanism for the project;
- (x) Chapter 9. Environmental Management Plan, which includes the institutional arrangement, roles and responsibilities of stakeholders including contractors and environmental performance criteria;
- (xi) Chapter 10.Monitoring and Reporting, which includes capacity building, cost and other reporting obligations;
- (xii) Chapter 11. Conclusion, which provides overall analysis, conclusion and recommendations of the IEE.

II. POLICY LEGAL AND ADMINISTRATIVE FRAMEWORK

A. ADB Safeguard Policy statement

16. ADB's Safeguard Policy Statement (SPS) governs the environment and social safeguards of ADB's operations. The goal of the SPS is to promote the environmental and social sustainability of ADB supported projects by protecting people and their environment from potential adverse impacts and enhancing the benefits provided. The SPS requirements for environmental safeguards support the integration of environmental considerations into the project decision-making process. These requirements are triggered if a proposed project is likely to have environmental impacts and risks to the physical, biological, socioeconomic, and/or physical cultural resources in the project's area of influence.¹⁸ Project screening and categorization using

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¹⁸ ADB. 2009. Safeguard Policy Statement. Manila.

the sector-based rapid environmental assessment (REA) checklists determines the categorization of the project based on the significance of the project's potential environmental impacts and risks.

- 17. **Categorization**. ADB assigns one of the following environmental categories to the proposed project:
 - (i) **Category A**. The project is likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented. Impacts may affect an area larger than the sites or facilities subject to physical works. A full-scale environmental impact assessment (EIA), including an environmental management plan (EMP), has to be prepared by the borrower/client.
 - (ii) **Category B**. The project's potential environmental impacts are less adverse and fewer in number than those in category A. Impacts are site-specific, few of which, if any, are irreversible. Impacts can be readily addressed through mitigation measures. An initial environmental examination (IEE), including an EMP, has to be prepared by the borrower/client.
 - (iii) **Category C**. The project is likely to have minimal or no adverse environmental impacts. An EIA or IEE is not required, but ADB will conduct a desk review of the project's environmental implications.
 - (iv) Category FI. The project involves the investment of ADB funds to or through a financial intermediary
- 18. Initial screening using the REA checklist indicates that the subproject will not cause any significant negative environmental impacts and that most impacts are site specific, temporary and therefore the subproject is classified as Category B for Environment per ADB SPS.
- 19. For Category B project, ADB SPS also requires the conduct of initial environmental examination (IEE); preparation of corresponding IEE report, which includes an environmental management plan (EMP), consultation and disclosure requirements, establishment of a grievance redress mechanism (GRM), compliance monitoring and reporting, updating of the IEE in the event of unanticipated impacts, applying pollution prevention and control technologies and practices consistent with international good practices, ensuring that workers are provided with a safe and healthy working environment, and other elements as indicated in the suggested outline of IEE report in the SPS.
- 20. The project must also identify and assess the risks to, and potential impacts on, the safety of affected communities during the design, construction, operation, and decommissioning of the subproject, avoid significant damage to physical cultural resources and the institutional responsibilities of all key parties involved in EMP implementation and project environmental management must be clearly designated. The work must not be initiated or contract awarded unless the project is approved by ADB and the EMP is included in the contract documents.
- 21. Mitigation measures and Environmental Management Plan. Once potential impacts and risks are identified, mitigation measures are required to be developed for each impact and risk. As a general rule, a mitigation hierarchy is followed, starting with avoidance, minimization, mitigation, and lastly, compensatory measures to offset significant residual impacts. Key environmental considerations can also be incorporated upfront into the project design.
- 22. **Meaningful Consultation**. ADB SPS, 2009 requires meaningful consultation with affected people that:

- (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle;
- (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people;
- (iii) is undertaken in an atmosphere free of intimidation or coercion;
- (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and
- (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.
- 23. As a minimum, stakeholders of each subproject will be consulted regarding the scope of the environmental study and will then be informed during environmental assessment about the likely impacts of the subproject and proposed mitigation measures. The report will record the views of stakeholders and indicate how these have been taken into account in project development. A variety of approaches for consultations include public meetings, focus group discussions, workshops, and public information campaigns. Public consultations may include newspaper advertisement in the local and national newspapers well before the consultations giving brief project description, location, and specific contact data (including telephone numbers). In the meetings, presentations will be provided about the subproject's potential environmental and social impacts. Consultation sessions must have attendance sheets prepared and included as part of the documentation. See Table 2 below for the template.

Table 2: Template of Attendance Sheet for Consultation Meetings

S.N.	Name of Attendees	Gender (M/F)	Age	Affiliation and Position	Signature

- 24. Public consultation and involvement will be given highest priority in the implementation of mitigation measures. Public consultation will take place, and on the basis of decision of the consultation meeting, implementation of mitigation measures will be prioritized and will be carried out with the involvement of the local people.
- 25. **Information Disclosure**. Information will be disclosed through public consultation and more formally by making documents and other materials available in a form and at a location in which stakeholders can easily access. This will involve making reports available at public locations within the vicinity of the sites and providing a mechanism for the receipt of comments and making documents available more widely by lodging them on the ADB and NHDCL websites.
- 26. Subject to approval by NHDCL and clearance by ADB, PMU will disclose the following documents on the project website, and endorse these same documents to ADB for disclosure on ADB website:
 - (i) environmental assessment and review framework;
 - (ii) the final IEE report for each subproject (per location);
 - (iii) new or updated IEE reports, and corrective action plan prepared during project implementation, if any; and
 - (iv) semi-annual environmental monitoring reports.

- 27. PMU will provide relevant environmental information, including information from the relevant documents in a timely manner, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders. For illiterate people, other suitable communication methods will be used. For the benefit of the community, the summary of the IEE will be translated in the local language (Dzongkha) and made available at: (i) offices of PMU; and (ii) offices of the supervising/implementing unit or office.
- 28. Hard copies of the IEE will be available in the PMU and local supervising/implementing units, and accessible to citizens as a means to disclose the document and at the same time creating wider public awareness. On demand, the person seeking information can obtain a hard copy of the complete IEE document at the cost of photocopy from these offices. Electronic version of the IEE reports will be placed in the project website after approval of the documents by Government and clearance from ADB. PMU will issue notification on the disclosure mechanism in local or national newspapers, ahead of the initiation of implementation of the project, providing information on the project, as well as the start dates, etc. This will create awareness of the project implementation among the public. PMU will consider other additional means of information disclosure depending on practicability, such as the distribution of posters to community billboards within the vicinity of the subproject sites to mass campaign the basic tenets of the IEE.
- 29. **Grievance Redress Mechanism (GRM)**. A GRM must be established to allow affected people a trusted way to voice and resolve project-related concerns, and to enable the project to effectively address affected people's concerns. The GRM can be used to cover the environmental, involuntary resettlement and/or Indigenous Peoples safeguard requirements.
- 30. **Occupational Health and Safety**. The PMU must ensure safe and healthy worker conditions and prevent accidents, injuries, and disease. This includes identifying and minimizing, the causes of potential hazards to workers; providing preventive and protective measures, worker training and awareness and other measures to minimize risks and hazards at the workplace; and ensuring emergency response and compensation for work related injuries and fatalities
- 31. **Community Health and Safety**. The PMU must identify and assess the risks to, and potential impacts on the safety of affected communities during the design, construction, operation, and decommissioning of the subproject, and establish preventive measures and plans to address them in a manner commensurate with the identified risks and impacts.
- 32. **Pollution prevention and control techniques**. The PMU must apply pollution prevention and control technologies and practices consistent with international good practice, as reflected in internationally recognized standards such as the World Bank Group's Environment, Health and Safety Guidelines, during the design, construction, and operation of the project.
- 33. **Unanticipated Environmental Impacts.** The PMU must update the environmental assessment and EMP or prepare a new environmental assessment and EMP to assess the potential impacts, evaluate the alternatives, and outline mitigation measures and resources to address any unanticipated impacts.
- 34. **Physical Cultural Resources (PCR).** The PMU must identify and avoid significant damage to any PCR by the project. Chance finds procedure must be used by contractors in the event that such PCR is discovered during project implementation.

35. **Bidding and Contract Documents.** The EMP must be verified by the PMU and included in bidding and contract documents and along with any specific provisions requiring contractors to comply with all other conditions required by ADB or provisions of the loan agreement.

B. National Environmental Assessment Act and Related Legislations

Table 3: Summary of National Environmental Assessment Act and Related Legislations

	Table 3: Summary		onmentai Assess		ted Legislations	
		Applicable		Remarks /		
		Consent / Permit	Governing	Relevance to	Implementation	
Regulation	Brief Description	Requirement	Agency	Subproject	Phase	Responsibility
Environmental as						
Environmental	Establishes	Environment	National	Subproject is	Design Phase /	PMU
Assessment Act	procedures for the	Clearance	Environment	subject to this Act	Pre-construction	
2000	assessment of		Commission	as construction of	Phase	
	potential			buildings will		
	environmental			bring about		
	impacts and aims to			environmental		
	determine the			impacts.		
	measures to avoid,					
	mitigate, reduce the					
	adverse impacts, and					
	promote					
	environmental					
	benefits of projects,					
	plans, and policies.					
Regulation for	Describes the			The housing		
The	responsibilities and			subproject is		
Environmental	procedures for the			covered by this		
Clearance of	implementation of			regulation.		
Projects	Environmental			Project is		
(RECOP) 2016	Assessment Act			categorized as		
	2000 in relation to the			Blue category		
	issuance and			requiring an IEE.		
	enforcement of					
	environmental					
	clearances at the					
	project level. It					
	defines specific					
	activities of projects					
	where competent					
	authorities can issue					
	an environmental					
	clearance (EC) and					
	those requiring NEC					

		Applicable Consent / Permit	Governing	Remarks / Relevance to	Implementation	
Regulation	Brief Description	Requirement	Agency	Subproject	Phase	Responsibility
	evaluation and	•	<u></u>	• •		,
	approval of EC.					
National	Provides an effective			Under this Act,		
Environment	system of conserving			the IEE of the		
Protection Act	and protecting the			subproject will be		
2007	environment and			reviewed by NEC.		
	established the NEC			The provisions of		
	and other designated			the EMP will be		
	Competent			followed during		
	Authorities and			subproject		
	advisory committees			implementation to		
	responsible for			ensure		
	independently			compliance with		
	regulating and			this Act.		
	promoting sustainable					
	development.					
Bhutan	Sets minimum	-		The subproject is		
Environmental	standards for i)			expected to emit		
Standards 2010,	ambient water			pollutants during		
and Drinking	quality, ii) industrial			construction and		
Water Quality	effluent discharge			operation phases		
Standards 2016	standards, iii)			and will be		
	standard for			required to		
	sewerage effluents,			comply with		
	iv) ambient air			applicable		
	quality, v) industrial			standards.		
	emission standards,			Applicable		
	vi) workplace			environmental		
	emission standards,			standards for the		
	vii) vehicle emission			subproject are		
	standards and, viii)			ambient air, noise		
	noise level limits.			level limits, and		
				drinking water		
				quality. PMU will		
				ensure		
				compliance of		

Regulation	Brief Description	Applicable Consent / Permit Requirement	Governing Agency	Remarks / Relevance to Subproject	Implementation Phase	Responsil	bility
Maria Managan				Contractor(s) to applicable environmental standards during construction.			
Waste Managem Waste Prevention and Management Act of Bhutan 2009	Institutional framework on waste management to reduce generation at source, promotes segregation, reuse, and recycling, storage, transportation, environmentally-sound treatment and disposal of waste, and monitoring procedures and coordination at every organizational level	Waste disposal permit Demolition Permit	Phuentsholing Thromde	The subproject is a potential generator of solid wastes during construction and operation phases. The subproject will comply with this Act and ensure waste segregation, collection, storage and disposal as per Thromde requirements.	Design Phase / Pre-construction Phase / Construction Phase / Operation Phase	PMU, Contractor, NHDCL	PIU,
Prevention and Management Regulation 2012 (amended 2016)	establishes procedures and requirements to implement the Waste Prevention and Management Act2009.						
Water	T =	T		T	1 = -	T =	
Water Act of Bhutan 2011	Ensures that water resources are protected, conserved, and/or managed in an economically efficient, socially	No specific permit required, but any development project needs to comply with the provisions of this	National Environment Commission	The subproject is expected to generate wastewater that could potentially impact the	Design Phase / Pre-construction Phase / Construction Phase / Operation Phase	PMU, Contractor, NHDCL	PIU,

Regulation	Brief Description	Applicable Consent / Permit Requirement	Governing Agency	Remarks / Relevance to Subproject	Implementation Phase	Responsibility
	equitable, and environmentally sustainable manner.	Act and regulation.		environment during construction and		
Water Regulation of Bhutan 2014	Promulgated to enforce the objectives and purposes of the Water Act 2011, effectively implement and enforce the Water Act by the Competent Authorities; and identify roles and responsibilities of designated Competent Authorities and other relevant organizations.			operation phases. PMU will ensure compliance with the requirements of this Act.		
Forestry and Bio		T =	T	T	T =	T =
Forest and Nature Conservation Rules 2000 (revised 2006, 2017)	Provides rules for project activities that involve clearing and felling of trees, blasting, etc. It also define activities that are prohibited in forested areas, outlines procedures for sourcing sand and gravel, peat, stone, and surface soil from forested areas.	Tree felling permit, if applicable to the site.	Phuentsholing Thromde, Environment Division/Forest Range Office	The subproject will not impact any protected areas, critical habitats or endangered species. However, the subproject is expected to cut 7 trees at the site, which requires permission from the Forest Department.	Design Phase / Pre-construction Phase	PMU, PIU, Contractor

Regulation	Brief Description	Applicable Consent / Permit Requirement	Governing Agency	Remarks / Relevance to	Implementation Phase	Responsibility
Regulation Forest and Nature Conservation Act 1995	Brief Description Allows community stewardship of forests and aims to provide protection and sustainable use of forests, wildlife, and related natural resources. Describes activities that require special permits from the Department of Forests and Park Services as well as other activities such as forest clearing and cutting of trees, hunting and polluting which are not allowed in Government Reserved Forests. All wild animals whether enlisted under Schedule I (totally protected species) or not, cannot be killed, injured, captured or collected unless	Requirement	Agency	Subproject The subproject will not impact any protected areas, critical habitats or endangered species. However, the subproject is expected to cut 7 trees at the site, which requires permission from the Forest Department.	Phase	Responsibility
Diadirensity Ast	under special conditions of self-protection and other genuine reasons.	No anaisa na wait	National	Cubanciant is not	Decision Phase /	DMU
Biodiversity Act 2003	Sets forth national sovereignty over genetic resources; ensures conservation and sustainable use of biochemical and	No specific permit required, but any development project needs to comply with the	National Environment Commission	Subproject is not located in ecologically sensitive areas. However, the subproject will	Design Phase / Pre-construction Phase	PMU

		Applicable		Remarks /			
		Consent / Permit	Governing	Relevance to	Implementation	l	••••
Regulation	Brief Description	Requirement	Agency	Subproject	Phase	Responsib	oility
	genetic resources;	provisions of this		need to			
	promotes equitable	Act.		continuously			
	sharing of benefits			monitor the			
	derived from genetic			implementation of			
	resources; promotes technology transfer			the subproject to ensure no			
	and capacity building;			protected species			
	recognizes and			(especially the			
	protects traditional			wandering or			
	knowledge,			migratory kinds),			
	innovation, and			if ever found at			
	practices of local			the site or vicinity			
	communities			in the future, will			
	associated with			be affected.			
	biodiversity;			bo anotica.			
	regulates the						
	collection of genetic						
	resources and						
	prevents illegal						
	access; recognizes						
	and protects farmers'						
	and breeders' rights;						
	and regulates plant						
	variety and property						
	rights and use.						
Occupational He	ealth and Safety						
Bhutan	The following are	No specific permit	N/A	The subproject	Design Phase /	PMU,	PIU,
Constitution	relevant provisions	required, but any		will involve	Pre-construction	Contractor,	
2008	on protection of	development		workers. These	Phase /	NHDCL	
	workers:	project needs to		provisions of the	Construction		
	 Article 5 (2.d) 	comply with the		constitution on	Phase / Operation		
	ensures a safe	relevant		workers'	Phase		
	and healthy	provisions of the		occupational			
	environment.	constitution.		health and safety			
	 Article 9 (12) 			will be complied			
	endeavors to			by the subproject.			
	ensure the right to						

		Applicable Consent / Permit	Governing	Remarks / Relevance to	Implementation	
Regulation	Brief Description	Requirement	Agency	Subproject	Phase	Responsibility
. .	work, vocational		<u> </u>	,		
	guidance and					
	training and just					
	and favorable					
	conditions of					
	work.					
	 Article 9 (13) 					
	endeavors to					
	ensure the right to					
	rest and leisure,					
	including					
	reasonable					
	limitation of					
	working hours					
	and periodic					
	holidays with pay.					
	Article 9 (14)					
	ensures the right to fair and					
	reasonable					
	remuneration for					
	one's work.					
	 Article 9 (17) 					
	takes appropriate					
	measures to					
	eliminate all forms					
	of discrimination					
	and exploitation					
	against women					
	including					
	trafficking,					
	prostitution,					
	abuse, violence,					
	harassment and					
	intimidation at					
	work in both					

Regulation	Brief Description	Applicable Consent / Permit Requirement	Governing Agency	Remarks / Relevance to Subproject	Implementation Phase	Responsibility
	public and private spheres. Article 9 (18) takes appropriate measures to ensure that children are protected against all forms of discrimination and exploitation including trafficking, prostitution, abuse, violence, degrading treatment and economic exploitation. Article 9 (22) provides security in the event of sickness and disability or lack of adequate means of livelihood beyond one's					
Labour and Employment Act (LEA) 2007	means of control. Provides for the regulation of employment and working conditions, including occupational health and safety, labor protection and relations as well as	Foreign worker permit	Ministry of Labor and Human Resources	The subproject will involve contractors and workers. PMU will ensure that Contractor(s) comply with the relevant	Design Phase / Pre-construction Phase / Construction Phase / Operation Phase	PMU, PIU, Contractor, NHDCL

Regulation	Brief Description	Applicable Consent / Permit Requirement	Governing Agency	Remarks / Relevance to Subproject	Implementation Phase	Responsibility
	setting of occupational standards and certification.			provisions of this Act		
	The Act aims to improve employees' work environment and working conditions to safeguard and keep work ability, prevent occupational accidents, diseases, and other physical or mental problems related to work.					
Regulations on Occupational Health, Safety and Welfare, March 2012 (supersedes the General Rules and Regulations on Occupational Health and Safety in Construction, Manufacturing, Mining and Service Industries 2006)	Prescribes standards and procedures on occupational health, safety and welfare for workplaces, instruments, vessels, appliances, apparatuses, tools, devices, electrical safety and other hazardous conditions. It aims to ensure safety, health and welfare for employees as well as other persons at workplaces from work-related risks to their health, safety and wellbeing	No specific permit required, but any development project needs to comply with the provisions of this regulation.	Ministry of Labor and Human Resources	The subproject will involve workers. The PMU will monitor compliance of the Contractor(s) in providing for safe and healthy working conditions during construction of the buildings.	Construction Phase / Operation Phase	PMU, PIU, Contractor, NHDCL

Regulation Regulations on Working Conditions 2012 (first edition in 2009)	Brief Description Under the MOLHR, these are 15 regulations which provide for the employment conditions required to	Applicable Consent / Permit Requirement No specific permit required, but any development project needs to comply with the provisions of this	Governing Agency Ministry of Labor and Human Resources	Remarks / Relevance to Subproject The subproject will involve workers. Contractors will be required to strictly comply	Implementation Phase Construction Phase / Operation Phase	Responsibi PMU, Contractor, NHDCL	lity PIU,
	implement the provisions of the LEA 2007 effectively. The 15 Regulations cover issues such as recruitment and management of foreign workers, child labor, hours of work, grievance procedure, sexual harassment, workers' compensation, etc.	regulation.		with the relevant provisions identified in the regulations. The PMU will monitor compliance.			
Regulations on Occupational Health and Safety for Construction Industry 2012 (supersedes 2009)	These regulations set the occupational health and safety standards, and procedures on construction safety. It aims to ensure safety and health for employees, as well as other persons at the construction sites, from work related risks to their health, safety, and wellbeing. It also prescribes the roles and responsibilities of the workers and	No specific permit required, but any development project needs to comply with the provisions of this regulation.	Ministry of Labor and Human Resources	The subproject will involve workers. Contractor(s) will be required to provide workers with safe and healthy working conditions during construction. Workers will be provided with safety and protection equipment, where needed. PMU will monitor	Construction Phase / Operation Phase	PMU, Contractor, NHDCL	PIU,

Regulation	Brief Description	Applicable Consent / Permit Requirement	Governing Agency	Remarks / Relevance to Subproject	Implementation Phase	Responsibil	itv
	employers in ensuring health and safety at the site.			compliance of the Contractor(s).			
Road Safety and Transport Act 1999	Provides for safe and efficient use of road systems and to ensure an efficient and a safe public transport system. Describes the duties of the drivers related to traffic safety signs and safety procedures to prevent and minimize transport accidents.	No specific permit required, but any development project needs to comply with the provisions of this Act.	Road Safety and Transport Authority	The subproject site is adjacent to main roads. Contractor(s) will be required to comply with the relevant provisions of this Act to prevent accidents in the construction sites. PMU will monitor compliance.	Construction Phase	Contractor Trasporter	/
Disaster Management Act of Bhutan 2013	Establishes and strengthens institutional capacity for disaster management in institutions, mainstreaming of disaster risks reductions in policies and plans, and integrates and coordinates disaster management activities and how to respond to emergencies.	No specific permit required, but any development project needs to comply with the provisions of this Act.	Phuentsholing Thromde	The subproject is a housing project requiring designs to ensure disaster resiliency. Provisions for disaster resilience will be included in the infrastructure designs.	Construction Phase / Operation Phase	PMU, F Contractor, NHDCL	PIU,
Others	<u> </u>						
Bhutan Building Regulation 2018	This regulation defines the set of rules that specify the minimum acceptable	Building construction approval / permit	Phuentsholing Thromde	The subproject involves building construction. The subproject will	Design Phase / Pre-construction Phase	PMU	

		Applicable Consent / Permit	Governing	Remarks / Relevance to	Implementation	
Regulation	Brief Description	Requirement	Agency	Subproject	Phase	Responsibility
Regulation	level of safety for	Requirement	Agency	need to strictly	i iiuse	responsibility
	building			comply with this		
	infrastructures in			set of rules and		
	Bhutan. It has			will be adhered to		
	various specific			during design		
	objectives, which			phase.		
	include, among			'		
	others the following:					
	(i) prescribe					
	standards for the					
	construction and					
	demolition of					
	buildings, (ii)					
	prescribe					
	requirements for the					
	design and siting of					
	single dwellings and					
	associated buildings,					
	(iii) prescribe					
	standards and					
	matters relating to					
	the maintenance of					
	fire safety and safety					
	measures, (iv)					
	provide for matters					
	relating to the					
	accreditation of					
	building products,					
	construction					
	methods, designs,					
	components and					
	systems connected					
	with building work,					
	and (v) prescribe					
	qualifications and					
	provide for other					
	matters relating to					

		Applicable	Coverning	Remarks /	Implementation	
Regulation	Brief Description	Consent / Permit Requirement	Governing Agency	Relevance to Subproject	Implementation Phase	Responsibility
	registration of	Tio quii o iii o	, igency		1 1100	, recoponionally
	building practitioners.					
Building Code of	This Building Code			The subproject		
Bhutan 2018	has been issued as			involves building		
	part of and to ensure			construction. The		
	the effective			subproject will		
	implementation of the			need to strictly		
	Bhutan Building			comply with this		
	Regulation 2018. It			set of rules and		
	sets out the technical			will be adhered to		
	requirements,			during design		
	standards and design			phase.		
	considerations which					
	shall apply to					
	construction of					
	buildings in Bhutan.					
	The Code ensures					
	safety of buildings,					
	protect public health					
	and general welfare					
	related to building					
	constructions and its					
D	occupancy.					
Bhutan Green	This Guidelines was			The subproject		
Building	issued by the Ministry			involves building		
Guidelines,	of Works and Human			construction.		
2013	Settlements to			Although not		
	introduce for the			mandatory, the		
	basic concepts,			subproject may		
	sustainable green			use this set of		
	principles and			guidelines as reference during		
	approaches that will					
	be practical for consideration in the			design phase.		
	design and					
	construction of future					
	buildings in Bhutan. It					
	pullulings in Dilutail. It					

		Applicable Consent / Permit	Governing	Remarks / Relevance to	Implementation	
Regulation	Brief Description	Requirement	Agency	Subproject	Phase	Responsibility
	aims to inspire					
	positive change in					
	the built environment					
	of Bhutan; motivate					
	policies, regulations,					
	standards, and					
	projects that will					
	minimize negative					
	impacts of the built					
	environment on the					
	natural environment					
	of the country while					
	enhancing the					
	positive impacts of					
	sustainable building					
	design and					
	construction					
	practices for the					
	present and future					
	generations.					
Bhutanese	The Guidelines was			The subproject		
Architecture	issued by the Ministry			involves building		
Guidelines 2014	of Works and Human			construction.		
	Settlements to be			Although not		
	used as a reference			mandatory, the		
	to understand the			subproject may		
	various elements of			use this set of		
	Bhutanese			guidelines as		
	architecture and its			reference during		
	values while			design phase.		
	providing a guide to					
	what could be					
	appropriate for new					
	design and					
	construction in					
	Bhutan according to					
	the values found in					

Regulation	Brief Description	Applicable Consent / Permit Requirement	Governing Agency	Remarks / Relevance to Subproject	Implementation Phase	Responsibility
	traditional architecture of Bhutan.					

C. COVID-19 Pandemic Measures and Protocols

- 36. In Bhutan, the first patient tested positive for COVID 19 was in March 2020. A year after the pandemic, less than 1,000 positive cases were reported (921 as of April 12, 2021), of which there are 45 active imported cases. So far one death is linked to the virus. Since the detection of the first COVID-19 positive case, several measures have been undertaken. At the national level, there is a National COVID-19 Task Force (NC19TF) chaired by the Prime Minister. This is the highest decision-making body in the country on all policy matters related to COVID-19 management. There are three multi-sectoral Regional COVID-19 Task Force and district and subdistrict COVID-19 Task Force in each district. There is also a Health Emergency Management Committee (HEMC) tasked with decision-making regarding the matters related to health emergency management including the surveillance, quarantine and testing based on the scientific evidence.
- 37. The government, through the Ministry of Health (MOH), has a Media and Risk Communication team responsible for communication and information dissemination to the general public.¹⁹ Measures have been undertaken to prevent the import, transmission, contain and manage the disease are summarized below.
 - (i) Creation of COVID-19 Taskforce and zonation in municipalities and districts;
 - (ii) Mandatory 21-day quarantine for all in-coming travels arriving in the country from abroad under a designated quarantine facility, and 7-day quarantine for travelers to the border districts:
 - (iii) 2 nationwide lockdowns to prevent community transmission, and restrictions on movement after 9PM;
 - (iv) Installation and use of Druk Trace App or registry in all public places including public transport, hand wash stations and mandatory use of mask and regular advocacy and dissemination for social distancing through print, broadcast and social media. Protocols for shops, schools and offices;
 - (v) Temporary closure of schools and introduction of online classes;
 - (vi) Compulsory pre-registration online for all inter-district travel on the Check Post Management System, and quarantine for travelers; and
 - (vii) First vaccination of all eligible persons in April 2021.
- 38. The government also has its COVID 19 Strategies and Protocols (e.g. for import and export of goods, protocols for testing, lockdown, movement with pass, containment of outbreak, containment, decontamination and disinfection, management of dead bodies). Specific standard operating procedures (SOPs) or guidelines are included in the following issuances that can be found on the MOH website, which are being updated from time to time depending on COVID-19 situation in the country.²⁰ These SOPs or guidelines are applicable to the project.
 - (i) MOH, 2020a. SOP for decontamination and disinfection of COVID-19 contaminated area. March 2020;
 - (ii) MOH, 2020b. SOP for Safe and Dignified Management of Dead body of Suspected or Confirmed COVID-19, March 2020;

¹⁹ WHO, 2020. Bhutan Decision making for social and movement measures in the context of COVID-19 SNAPSHOT AS OF NOVEMBER 2020. Retrieved from https://www.who.int/docs/default-source/hgf/bhutan.pdf?sfvrsn=ce5445da 9

²⁰ http://www.moh.gov.bt/covid-19-strategies-protocols-and-guidance/

- (iii) MOH, 2020c. Containment of COVID-19 outbreak in Cluster Surveillance 2nd-Sept-2020;
- (iv) MOH, 2020d. Additional Measures to prevent and contain local transmission in high-risk areas. May 2020;
- (v) MOH, 2020e. Strategy for Engaging High-Risk Communities for COVID Prevention & Control, April 2020; and
- (vi) MOH, 2020f. National COVID 19 Testing Protocols, December 2020.
- 39. A contractor has to apply online for foreign workers, after which a limited number may be approved, and there are mandatory protocols and costs to be borne by the contractor. The contractor will be required to have a COVID-19 Standard Operating Protocol (SOP) and plan for its project sites. See Appendix 3.

D. Relevant International Conventions and Treaties

40. Bhutan is a party to several multilateral environmental agreements. Of these conventions, the most relevant to the subproject are in Table 4. There are no elements of the project that contravene the direction and intentions of these conventions.

Table 4: International Environmental Agreements

	International Environmental			
	Agreement	Ratified	Relevance	Remarks
1	Convention on Biological Diversity (1992)	23 November 1995	Integrate conservation and sustainable use of biological diversity into relevant sectoral plans Identify components of biological diversity important for its conservation and sustainable use.	The IEE process takes into consideration compliance with this agreement.
2	Convention on International Trade in Endangered Species of Wild Fauna and Flora (Washington 1973) – also known as CITES	15 August 2002	Requires Parties to the Convention not to trade in listed species other than in accordance with the Convention	The subproject does not involve any trade in wildlife or plant species.
3	Convention Concerning the Protection of the World Cultural and Natural Heritage (Paris 1972)	22 October 2001	Parties are responsible for not undertaking deliberate measures which might damage directly or indirectly the cultural and natural heritage	The IEE process takes into consideration compliance with this agreement. The project's site selection criteria has put a condition that the site must not cause damage to Physical Cultural Resources and follow chance finds procedure

	International Environmental			
	Agreement	Ratified	Relevance	Remarks
				in case of chance finds.
4	Vienna Convention for the Protection of the Ozone Layer	23 August 2004	Phasing out the chemicals that deplete the ozone	The IEE process takes into consideration compliance with this agreement, ensuring that the subproject follows NEC requirements, including prohibition on the use of ozone-depleting substances.
5	UN Framework Convention on Climate Change	25 August 1995	Bhutan has committed to remain carbon neutral, and to keep greenhouse gas (GHG) emissions less than the sequestration capacity of its forests for all times	The IEE process takes into consideration compliance with this agreement. The subproject will ensure to implement measures to reduce emission of greenhouse gases as much as possible.
6	Basel Convention on the Control of Tran boundary Movements of Hazardous Wastes and their Disposal	26 August 2002 (accession)	Management hazardous waste in an environmentally sound manner and to follow a system for trans boundary waste movement	The IEE process takes into consideration compliance with this agreement, ensuring that the subproject follows NEC requirements, including management of hazardous wastes.
7	Montreal Protocol on Substances that Deplete the Ozone Layer	April 2004	Protection of the Earth's ozone layer by phasing out the chemicals that deplete it	The IEE process takes into consideration compliance with this agreement, ensuring that the project follow NEC requirements, including use of

	International Environmental Agreement	Ratified	Relevance	Remarks
				ozone-depleting substances.
8	United Nations Convention to Combat Desertification	Aug 2003	Specifically focuses on arid, semi-arid and dry sub-humid areas	Not relevant for the project.
9	The Cartagena Protocol on Biosafety to the UN Convention on Biological Diversity	September 2002	Focus is on the safe handling, transport and use of living modified organisms (LMOs) resulting from modern biotechnology that may have adverse effects on biological diversity	Not relevant to the project.
10	The Nagoya Protocol	September 2013	Focus is on access to genetic resources and benefit-and incentives to conserve and sustainably use genetic resources	Not relevant to the project.
11	International Plant Protection Convention	June 1994	Prevent and control the introduction and spread of pests and invasive species	The IEE process takes into consideration compliance with this agreement, ensuring that the project avoid planting invasive and non-native species.

E. Gaps in Legal and Guiding Instruments

- 41. The ADB SPS and national environmental laws are aligned with screening to determine the potential impact of a project on the environment, followed by appropriate environmental assessment, preparation of environmental management plans to avoid, mitigate, minimize and offset environmental impacts. While minor gaps are identified in terms of the other more specific ADB SPS requirements vis-à-vis the national environmental laws, gap-filling measures are available and can be readily complied with by the government through NHDCL as implementing agency. See Table 5.
- 42. The national procedures are comprehensive enough to ensure that any developmental activity/enterprise in sensitive and critical habitats/ecosystems, and affected rare or endangered species, or extraction of resources in large quantities are avoided from the screening stage. This includes impacts on religious and cultural sites as well.
- 43. Once a project is approved, it requires the proponent to comply to the terms and conditions of the approved Environmental Clearance with compliance monitoring and reporting during implementation of the EMP by the proponent. The project may also be independently monitored by the competent authority or NEC.

Table 5: Comparison of National Regulations and ADB Safeguard Requirements

	14515 5.	Comparison of National Regulations and ADB Safeguar	Extent of	Gap-filling
			Equivalence or	Measures
	ADB SPS Principles	National requirements	Gaps	
1	Conduct screening to determine the extent and type of required environmental assessment	Projects are screened into Green, Blue and Red categories that determine whether the level of environmental assessment If the development is within the E-1 (environmental conservation), E-2 (forest environments) precincts, the	No gaps	None required
		application has to be accompanied by a no objection certificate from the National Environment Commission (NEC).		
2	Conduct environmental assessment	Green project – No environmental assessment Blue project- initial environmental examination (IEE) is required Red project- environmental impact assessment (EIA) is required	No gaps	None required
3	Examination of project alternatives	Under RECOP, Annex 3, Sections 6 and 8, the project must provide a detailed analysis of the negative and positive impacts of the proposed project and its alternatives including the "alternative of not undertaking the project".	No gaps	None required
4	EMP preparation is part of IEE and EIA Process	The Environmental Assessment Act (EAA) provides for the formulation of environmental management plans (EMPs). The EMPs must identify environmental risks and address means of avoiding or minimizing adverse impacts (including direct, indirect and cumulative effects) and enhancing positive impacts. Applicants must also set out a monitoring program (both baseline and compliance monitoring) and are responsible for all project monitoring. Project monitoring is undertaken by the Competent Authority (CA) or NEC. The RECOP provides that: (i) "the CA shall be responsible for monitoring compliance" for projects requiring development consent and environmental clearance (EC), and (ii) the Secretariat [of NEC] shall monitor projects "that do not"	No gaps	None required
		require development consent".		
5	Conduct meaningful consultation with affected people	Public consultation is mandatory for any IEE/EIA. Under the EAA, applicants have a duty to inform and consult with "concerned people" and organizations before submitting the	No gaps	None required

	ADB SPS Principles	National requirements	Extent of Equivalence or Gaps	Gap-filling Measures
	Abberermopes	environmental assessment documents to the CA where the project is classified as a "significant project". NEC or the CA is authorized to "ensure that concerned people are given adequate opportunity to express their views on the project and that their views are adequately taken into account."	Oups	
6	EMP implementation and monitoring (with corrective actions, when needed	The EAA mentions that Applicants must [also] set out a monitoring program (both baseline and compliance monitoring) and are responsible for all project monitoring (project monitoring is undertaken by CA or NEC). RECOP requires that EMPs include the proposed mitigation measures, the need to budget mitigation measures, supervision, monitoring and evaluation requirements for the construction, operation and maintenance phases of the project cycle. RECOP provides that: (i) "the CA shall be responsible for monitoring compliance" for projects requiring development consent and EC, and (ii) the Secretariat [of NEC] shall monitor projects "that do not require development consent". The Environmental Assessment Act states that "compliance monitoring of projects" is undertaken by the Secretariat [of NEC]on becoming aware of non-compliance with the terms or other activities related to a project that may be dangerous to the environment."	No outstanding gaps in terms of policy. However, EMPs are not normally included in Contractor's contracts to ensure implementation of EMPs.	Include EMP into Contracts and ensure compliance monitoring and submission of environmental monitoring reports.
7	Establish Grievance Redress Mechanism (GRM)	Different agencies have different GRMs.	Partial gap due to lack of specific guidelines that can be followed by projects.	To ensure equivalence, the project needs to establish a GRM process that could be adopted from the site level to the agency level, including option for access to country's legal system

	ADB SPS Principles	National requirements	Extent of Equivalence or Gaps	Gap-filling Measures
				independently and regardless of the outcome of the project GRM process.
8	Appropriate public disclosure of EIA/IEE and EMP	Not mandatory to disclose, but documents are available in relevant government agencies.	Partial gap due to lack of specific directives or guidelines requiring mandatory disclosure of environmental assessment documents.	To ensure equivalence, the project needs to disclose the IEE through any means that could reach the general public.
9	Do not implement project activities in areas of critical habitats.	Forest and Nature Conservation Act, 1995; Forest and nature Conservation Rules, Sections 62, 70 and EAA and RECOP relate to this issue. Under Bhutan's laws and regulations, it is prohibited to undertake any human activities within the core zone of a protected area unless determined necessary by forest/protected area officials to achieve nature conservation objectives. Outside the core area, no construction is allowed except with a written permit or authorization from the MoA, acting as CA under the EAA. A permit for land clearance may be granted in private lands under strict conditions but not to alter protected area status, water catchment areas and areas containing high forest.	No gaps	None required
10	Apply pollution prevention and control technologies and practices consistent with international good practices as reflected in internationally recognized standards such as the World Bank Group's Environmental, Health and	The NEC sets the permissible emission standards for a) ambient water quality, Industrial Effluent Discharge Standard, Sewage Treatment Plant (STP) Discharge Standards, Ambient Air Quality, Workplace Emission Standards, Vehicular Emission and Noise Limit Standards, Noise Level Limits but this is monitoring is not mandatory for construction	No gaps in terms of availability of standards in the country. However, the implementation of regulations pertaining to these standards is an issue. Further, the	To ensure equivalence, the project should: (i) comply with the stricter internationally recognized standards or provide justification

	ADB SPS Principles	National requirements	Extent of Equivalence or Gaps	Gap-filling Measures
	Safety Guidelines. Adopt cleaner production processes and good energy efficiency practices.	The Vehicle fitness test must be done annually by the vehicle owner. The agency responsible for this is The Road Safety and Transport Authority (RSTA)	values of the national standards are less strict than the internationally recognized standard values. Partial gap in terms of the legislation having no explicit requirement for adopting cleaner processes and good energy efficiency practices, although it might be considered implicit in the legislation	if the option under the project is to use the national standards; and (ii) require the adoption of cleaner technologies and energy efficiency measures.
11	Safe working conditions	The Labour and Employment Act, 2007 governs employment and Occupational health and safety (OHS), including physical or mental health problems related to work. The Regulation on Occupational Health and Safety for Construction Industry, 2012 and the Regulation on Occupational Health, Safety and Welfare, 2016 have detailed requirements for contractors to follow to ensure the safety, health and welfare for employees and other persons at workplaces.	No gaps	None required
12	Conserve physical cultural resources Provide for the use of "chance find" procedures.	Any development activity within a heritage precinct requires a No objection certificate from the Ministry of Home and Cultural Affairs (MH&CA) Any valuable cultural property discovered must be immediately reported to the Department of Culture, Ministry of Home and Cultural through the concerned Dzongkhag.	Partial gap due to the absence of legislation or regulations to protect "chance finds".	To ensure equivalence, the project should include chance finds procedure that will be used during the implementation.

F. Other Statutory Requirements

44. **Application to the Bhutan Power Corporation (BPC).** The subproject will apply to BPC for allocation/installation of meter boxes and electricity connection at the subproject site, and for billing purposes during construction.

G. Applicable Environmental Standards

- 45. **Bhutan Environmental Standards 2010 (revised 2020).** The Bhutan Environmental Standards sets the minimum standards for (i) ambient water quality, (ii) industrial effluent discharge, (iii) sewerage effluents, (iv) ambient air quality, (v) industrial emission, (vi) workplace emission, (vii) vehicle emission, and (viii) noise level limits.
- 46. The Water Act of Bhutan, 2011 and the Water Regulation of Bhutan 2014 apply to all issues relating to water resources and their management. Based on these, there are water quality standards and guidelines, and effluent discharge standards into water resources. For example, the Drinking Water Quality Standards, 2016 ensures safe drinking water. It protects consumer health by describing the quality parameters for drinking water and the maximum permissible limit for each parameter. The Effluent Discharge Standard requires effluents to be treated using best available technology before discharging directly or indirectly to any water resource.
- 47. The Drinking Water Quality Standards, 2016, was developed in accordance with Section 13 (f) and Section 42 (a) and (b) of the Water Act of Bhutan, 2011, with the aim of ensuring safe drinking water and to protect consumer health. The standard describes the quality parameters set for drinking water and the maximum permissible limit for each of the set parameters, in order to limit the level of contaminants in drinking water.
- 48. Following requirements of ADB SPS, the project shall apply pollution prevention and control technologies and practices consistent with international good practice, as reflected in EHS Guidelines. When the government regulations differ from these levels and measures, the executing agency shall achieve whichever is more stringent. If less stringent levels or measures are appropriate in view of specific project circumstances, the executing agency will provide full and detailed justification for any proposed alternatives that are consistent with the requirements presented in ADB SPS, 2009. In view of this, Table 6, Table 7, Table 8 and Table 9 show the ambient air quality standards, noise level standards, effluent standards and drinking water quality standards to be followed by the project. Other applicable standards are also provided in Table 10, Table 11, and

49. **Table 12**.

Table 6: Ambient Air Quality Standards

	Avoraging	Guide		WHO Air Guideline		
Parameter	Averaging Period*	Bhutan's Ambient Air Quality Standard, 2010**(µg/m³)			Global Update^ 2005	Second Edition ^^ 2000
		Industrial Area	Mixed Area***	Sensitive Area****		
TSP	Annual	360	140	70	-	-
135	24-hour	500	200	100	-	-
PM ₁₀	Annual	120	60	50	20	-
	24-hour	200	100	75	50	-

Parameter	Averaging Period*	Bhutan's Ambient Air Quality Standard, 2010**(µg/m³)			WHO Air Guideline Global Update^ 2005	
	1-year	-	_	_	10	-
PM _{2.5}	24-hour	-	-	-	25	-
	Annual	80	60	15	-	-
SO_2	24-hour	120	80	30	20	-
	10-minute	-	-	-	500	-
	Annual	80	60	15	40	-
NO_2	24-hour	120	80	30	-	-
	1-hour	-	-	-	200	-
СО	8-hour	5,000	2,000	1,000	-	10,000
	1-hour	10,000	4,000	2,000	-	-
	15-minute	-			-	100,000

^{*} Due to short term duration of civil works, the shortest period will be more practical to use.

Table 7: Noise Level Standards

Receptor/ Source		oise Standard ines, 2012* (dB)	For Noise Levels	delines Value s Measured Out of oors** r LAq in dBA)	
	Day***	Night****	07:00 - 22:00	22:00 - 07:00	
Industrial area	75	65	70	70	
Mixed area 65		55	10	70	
Sensitive area	55	45	55	45	

Taken from Environmental Standards, National Environment Commission, Royal Government of Bhutan, November 2010.

Table 8: Effluent Standards

		NEC Standards,
Parameters	Unit	mg/l ^a
Biochemical Oxygen Demand	mg/l	30.0
Total Suspended Solids	mg/l	100
Fecal Coliform	CFU/100ml	1,000
pH	pH scale	6.5 – 9.0
Chemical Oxygen Demand	mg/l	125

^a Standards for Sewage Treatment Plant Effluent. Taken from Environmental Standards, National Environment Commission, Royal Government of Bhutan, November 2010.

50. Table 8 provides the standards for effluent for sewage treatment plant which may be the one applicable standards for any potential discharges (overflows) from septic systems (septic

^{**} Taken from Environmental Standards, National Environment Commission, Royal Government of Bhutan, November 2010.

^{***} Mixed Area means area where residential, commercial or both activities take place.

^{****} Sensitive Area means area where sensitive targets are in place like hospitals, schools, sensitive ecosystems.

Source: Environmental, Health and Safety General Guidelines, 2007. International Finance Corporation, World Bank Group.

Source: Air Quality Guidelines for Europe, Second Edition, 2000; WHO Regional Office for Europe, Copenhagen

^{**} Guidelines for Community Noise, WHO, 1999.Source: Environmental, Health and Safety General Guidelines, 2007. International Finance Corporation, World Bank Group.

bay time is from 0600 hours to 2200 hours (human activities).

^{****} Night time is from 2200 hours to 0600 hours (no human activities).

tanks and soak pits) of the housing subprojects. In addition, the septic system should comply with the recommendations of World Bank's Environmental, Health, and Safety (EHS) Guidelines, as follows:

- (i) Properly designed and installed in accordance with local regulations and guidance to prevent any hazard to public health or contamination of land, surface or groundwater;
- (ii) Well maintained to allow effective operation;
- (iii) Installed in areas with sufficient soil percolation for the design wastewater loading rate; and
- (iv) Installed in areas of stable soils that are nearly level, well drained, and permeable, with enough separation between the drain field and the groundwater table or other receiving waters.

Table 9: National Drinking Water Quality Standards, 2016

	National Drinki (for Urb	WHO Guidelines for Drinking-		
Group	Parameter	Unit	Max. Concentration Limits	Water Quality, 4 th Edition, 2011**
	Turbidity	NTU	5	-
Physical	pН		6.5 – 8.5	none
Filysical	Color (TCU)	Hazen Unit	15	none
	Taste and Odor		Non- objectionable	-
	Iron	mg/l	0.3	-
	Manganese	mg/l	0.4	-
	Arsenic	mg/l	0.01	0.01
	Fluoride [^]	mg/l	1.5	1.5
Chemical	Lead	mg/l	0.01	0.01
Chemical	Nitrate	mg/l	50	50
	Calcium	mg/l	75	-
	Mercury	mg/l	0.006	0.006
	Residual Chlorine	mg/l	0.2 - 0.5	5 ^^
	Sulphate	mg/l	250	-
Microbiological	E-coli	CFU/100ml	0	Must not be detectable in any 100 ml sample

Taken from Bhutan Drinking Water Quality Standard, 2016, National Environment Commission, Royal Government of Bhutan, 8 March 2016.

Table 10: Workplace emissions standards

_		Unit of	
Parameter	Period	measure	Standard
Total suspended particulate matter TSPM	8-hour average	mg/m3	10
Respirable suspended particulate matter RSPM (PM ₁₀)	8-hour average	mg/m3	5
PM _{2.5} *	24-hour average	mg/m3	25
	1 Year average	mg/m3	10
Sulfur dioxide (SO2)	8-hour average	mg/m3	1
Nitrogen Oxide (NOx)	8-hour average	mg/m3	1

^{**} Health-based guideline values

[^] To be tested for ground and spring water only.

^{^^} From WHO (2003) Chlorine in Drinking-water, which states that this value is conservative.

		Unit of	
Parameter	Period	measure	Standard
Carbon monoxide (CO)	1 hour average	mg/m3	5
Pb 17**	1 hour average	mg/m3	0.0005
Ozone***	8-hour average	mg/m3	0.08

Source: Environmental Standards, National Environment Commission, Royal Government of Bhutan, November 2010

PM 2.5 *- Gravimetric/light-scattering/beta attenuation-based instruments

Table 11: Motor vehicle emission standards

	Vehicle registered			Vehicle registered after Jan 1, 2021
	prior to Jan 1,	Vehicle registered	Vehicle registered	(Approval type:
Fuel Type	2005	after Jan 1, 2005	prior to Jan 1, 2021	Euro 6/BS VI)
Petrol (%CO)	4.5%	4.0%	4.0%	0.5%
Diesel (%HSU)	75%	70%	70%	50%

Source: Environmental Standards, National Environment Commission, Royal Government of Bhutan, November 2010.

Table 12: Vehicular noise level limits

	Table 12. Veniculai noise level innits					
SI. #	Type of Vehicle	Noise level limits dB(A)				
	Two-Wheeler					
1.1	Displacement up to 80cc	75				
1.2	Displacement more than 80cc but up to 175cc	77				
1.3	Displacement more than 175cc	80				
2	Vehicles used for carriage of passengers and capable of having not more than nine seats including the driver's seat	74				
3	Vehicles used for carriage of passengers and capable of having more than nine seats, including the driver's seat and a maximum gross vehicle weight (GVW) of more than 3.5 tonnes					
3.1	With engine power less than 150 KW	78				
3.2	With engine power more than 150 KW	80				
4	Vehicles used for carriage of passengers and capable of having more than nine seats, including the driver's seat: vehicles used for carriage goods					
4.1	With maximum GVW not exceeding 2 tonnes	76				
4.2	With maximum GVW greater than 3 tonnes but not exceeding 3.5 tonnes	77				
	Vehicles used for carriage of transport of goods with a maximum GVW exceeding 3.5 tonnes					
5.1	With engine power less than 75 KW	77				
5.2	With engine power more than 75 KW or above but not less than 150 kv.	78				

Source: Environmental Standards, National Environment Commission, Royal Government of Bhutan, November 2010.

III. DESCRIPTION OF THE PROJECT

A. Project Location and Area

51. The proposed site is located in the heart of Phuentsholing Thromde (municipality), under Chhukha Dzongkhag (District). See Figure 1. The site is located at the city center (26°53'13" N 89°22'35" E) at an elevation of 246 m. The total site area allocated for the infrastructure work is

^{**}National Institute of Occupational Safety and Health (NIOSH) Method 7303

^{***}UV Photometric/Chemiluminescence/Chemical Method

0.85 acres (approximately 0.34 hectare) and the Land User Certificate has been issued (plot number PGT-4027) to the NHDCL by the National land Commission (Appendix 4).

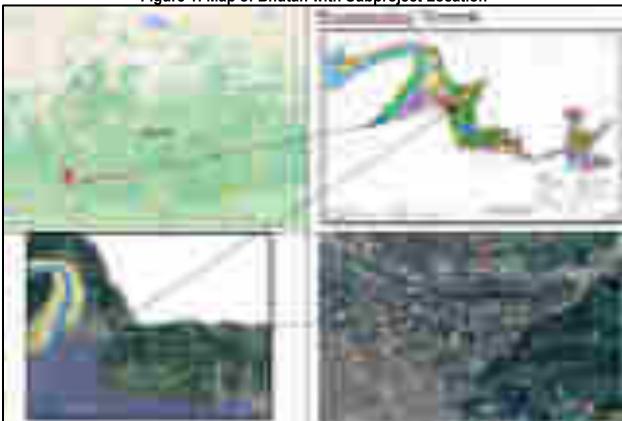


Figure 1: Map of Bhutan with Subproject Location

Source: Google earth, Phuentsoling Thromde and NHDCL

- 52. Figure 3 shows the access to the site. The site is accessible from the main street (Pelkhil Lam), where the Thromde Office among other residential buildings is situated. This street connects to the main road (marked in blue), that continues west towards the lower parts of the city, and east towards Kharbandi and the highway to Thimphu.
- 53. The site is centrally located within walking distance to the park (and open gym), the football ground, and various offices such as the banks (Tashi Bank, Bhutan National Bank) and Postal Office (Bhutan Post).



Figure 2: Vicinity Map of Subproject Site Showing Immediate Surroundings

Source: NHDCL

B. Subproject Rationale

54. Over the past decades, the growth in urban population due to increasing rural-urban migration and increasing development in urban areas has exerted great pressure on existing services. Phuentsholing has the second highest population (27,658) living within its municipal boundaries. Due to high cost of private rental accommodation, an increasing number of the low-income earners have opted to live in Jaigaon, the border Indian town, coming into Bhutan to work each day. The Drungkhag had collected the details on the families in need of housing in 2017 and 2018 for the distribution of NHDCL housing colonies but only 506 Bhutanese families were allotted the housing facilities in Phuentsholing. It was estimated that more than 2,000 people were living across the border.²¹ Since the COVID 19 pandemic surfaced in Bhutan, the government urged Bhutanese to shift to Phuentsholing, or to return to their villages. Over 5,000 Bhutanese were evacuated from Jaigaon and the majority of these were given accommodation in the temporary houses that were built for them at Amochhu. This housing was constructed to provide temporary housing for only two years.

55. Under the 12 Five Year Plan (FYP), the Government has a designated National Key Result Area (NKRA) that aims to improve livability, safety and sustainability of human settlements through access to adequate affordable housing, efficient and effective municipal services, and clean and green public spaces for social engagement. An integral part of this NKRA 15, is the provision of affordable housing, which is the primary objective of this subproject.

²¹ Rai, Rajesh. 'Bhutanese residing in Jaigaon start moving to Phuentsholing', Kuensel, March 17, 2020.

C. Subproject Alternatives and Site Selection

- 56. Within the Municipality, this site has been chosen in addition to two other sites, which together combined are still inadequate to sufficiently provide affordable housing for the target beneficiaries. There are no project alternatives because of the shortage of housing in the municipality. The government has placed great emphasis on improving livability and reducing disparities in access to affordable housing for low-income groups, and this subproject is part of the government's effort to reduce housing shortage.
- 57. Overall, while the housing development is intended for the low-income groups, the site selection has considered several factors that will ensure avoidance of or minimal environmental impacts, and will safeguard the welfare and well-being of the future occupants, such as, but not limited to, the following:
 - (i) Complies with all requirements of relevant national, state and local laws, rules and regulations;
 - (ii) Complies with all requirements of ADB SPS, 2009;
 - (iii) Does not involve components, processes and technologies that pose significant threat to public health and the environment, such as incinerators, etc.;
 - (iv) Does not involve works within or near environmentally sensitive locations (must be at minimum distance of 500m), including sites with national or international designation for nature conservation, cultural heritage, or any other purposes.²²
 - (v) Does not result in destruction of or encroachment onto physical cultural resources such as archaeological monuments; heritage sites; and movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance.
 - (vi) Does not lead to degradation of cultural properties, and loss of cultural heritage values and tourism revenues.
 - (vii) Not located in flood zones and/or adjacent to natural water courses (must not be within 30 meters from the edge of major streams, and/or within 15 meters from the edge of small streams);
 - (viii) Does not lead to alteration of surface water hydrology of streams/waterways through diversion of flow or reclamation;
 - (ix) Not located in areas that can cause adverse impact on human health, such as but not limited to the following:
 - Municipal solid waste dumps (must be at least 1 km away),
 - STPs (must be at least 500 m away),
 - Industrial area with polluting industries (must be at least 500 m away or at a distance wherein pollutants will not affect the ambient air quality at the site, whichever is more strict), and
 - High-tension cables (distance must be in compliance with the guidelines of the Bhutan Power Corporation and Bhutan Electricity Authority to avoid long term exposure to high electromagnetic fields (EMF)). The distance from high tension cable should ensure that the EMF is reduced to safe exposure level;²³

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²² The subproject shall comply with Thimphu's DCR-2016 particularly on sanctions pertaining to allowed locations for housing developments.

²³ US EPA: Questions and Answers About Electric and Magnetic Fields (EMFs).

- (x) Area that has sufficient space for all allied infrastructures. If there is no centralized septage management in the town, the area shall have sufficient space for septic tanks/chambers designed to accommodate target number of occupants;
- (xi) Avoids area with risk of landslides, unstable lands, etc. based on historical data, including geotechnical studies, if possible;
- (xii) Avoids removal of trees where possible. When mature trees must be removed, new trees must be planted following the compensatory replacement required by the government;
- (xiii) Area that is included in territorial jurisdiction of the municipality/town/city (Phuentsholing municipality for this subproject), compliant with land use regulations, and any urban development plans or master plans of the national or local government;
- (xiv) Area where access to basic services can be practically built or established. These basic services include water supply, sewerage system, electricity, telecommunication, sanitation/solid waste management, etc;
- (xv) If area is outside the periphery of the urban center, the area should be accessible via public transport and/or has road infrastructures leading to civic centers, markets, institutions such as hospitals, schools, etc.;
- (xvi) Does not adversely affect the existing community resources/ facilities, such as roads, sanitation services, water supply, solid waste management, power supply, parking spaces, etc.; and
- (xvii) Ensures that the subproject design will not lead to depletion of water supply and degradation of groundwater and surface water in the area. The following should be considered:
 - Conservation measures integrated into the design;
 - Water supply is sufficient during the operation phase. Liaising with water supply provider should be part of the consultation and assessment; and
 - Not to overburden the sewerage system and other infrastructures in the area.

D. Subproject Components and Design

- 58. The subproject at Drungpas Residence in Phuentsholing (that is the focus of this IEE) is one of 9 subprojects designed by the NHDCL that will provide affordable housing in six dzongkhags (districts), bringing the above benefits (and others) to an estimated 1,026 1,062 urban households mostly low-income civil servants, corporate employees and wage workers.
- 59. For this subproject, development works involve the construction of 4 buildings in total which includes 1 Category III (Type II) building with 24 units, 1 Category IV (Type II) building with 24 units, and 2 1-BHK building with 48 units. All buildings will have 6 floors, translating to a total of 96 units. Table 13 provides the details.

Table 13: Details of the housing complex at Drungpa's Residence area

SI. No.	Building Type	Number of Buildings	Total	Measurements
1	Category III (Type II)	1	24 units (1 Bldg. x 6 floors x 4 units)	Plinth area (1 st Floor): 389.9 m ² . (4,195.32 sq.ft.) Unit area: 97.48 m ² . (1,048.83 sq.ft)

SI. No.	Building Type	Number of Buildings	Total	Measurements	
2	Category IV 1 (Type II)		24 units (1 Bldg. x 6 floors x 4 units)	Plinth Area(1 st Floor): 308.64 m² (3320.97 sq.ft) Unit Area: 77.16 m² (830.24 sq.ft)	
3	1 BHK Building	2 48 units (2 Bldgs. x 6 floors x units)		Plinth Area(1Floor): 220.7 m ² (2,374.73 sq.ft.) Unit Area: 55.19 m ² . (593.844 sq.ft.)	
	Total	4	96	See details under description	
		_			
	Facilities	De	escription	Total Area	
4	Internal road and parking	To fit 36 light vehicles and 22 2- wheelers		951.61 m ²	
5	Other facilities Pedestrian Drinking wa Sub-station	ater storage tanks			

1. Building Design²⁴

- 60. The buildings are designed keeping in mind the location within the Local Area Plan and Development control regulation 2016, Building Regulation, 2018 and the Bhutan Building Code, 2018. These set out the requirements which apply to the construction of buildings. These regulations and codes prescribe the building dimensions, circulation space requirements, design standards, detailing of structures, light and ventilation requirements, water supply and sanitary control, electrical requirements and standards, fire safety, access, parking and provisions for disabled persons.
- 61. The structural design is in line with the following Special Publications and Indian Standards:
 - (i) IS 13920 2016 (Ductile Design of Reinforced Concrete Structures);
 - (ii) SP16 (Design Aids for Reinforced Concrete to IS 456);
 - (iii) IS 1893 Part 1 2016 (Criteria for Earthquake Resistant Design of Structures):
 - (iv) IS 4326-2013 (Earthquake Resistant Design and Construction of Buildings);
 - (v) IS 800 (Code of Practice for General Construction in Steel);
 - (vi) IS 875 1 (Code of Practice for Design Loads-Dead Loads);
 - (vii) IS 875 2 (Code of Practice for Design Loads- Live Loads);
 - (viii) IS 875_3 (Code of Practice for Design loads- Wind loads); and
 - (ix) SP 34 (Handbook on Concrete Reinforcement and Detailing).

The building designs presented in this IEE report are preliminary, which may be updated accordingly. NHDCL will comply with all relevant regulations such as the Bhutan Building Code 2018, Bhutan Building Regulations 2018, etc., including the requirement for emergency or fire exits as may be required.

- 62. The designs also comply with the Bhutan Green Building Guidelines, 2013, Bhutanese Architecture Guidelines, 2014, Bhutan Building Color Code, 2014 and the Design Guidelines for Differently Abled Friendly Construction, 2011.
- 63. The **Category III (Type II)** building will include 1 Living room, 2 Bedrooms, 2 Toilets, 1 Kitchen and 1 Balcony. Each Unit area will be 97.48 m² (1048.83 sq.ft) and Plinth area (1floor) will be 389.9 m² (4,195. 32 sq.ft.). The building will also have a lift and a fire exit.
- 64. The **Category IV (Type II)** building will include 1 Living room, 2 Bedrooms, 2 Toilets, 1 Kitchen and 1 Balcony. Each unit area will be 77.16 m² (830.24 sq.ft) and Plinth area (1floor) will be 308.64 m² (3,320.97 sq.ft.). The building will also have a lift and a fire exit.
- 65. The **1BHK** building will include 1 Living room, 1 Bedrooms, 1 Toilets, 1 Kitchen and 1 Balcony. Each unit area will be 55.19 m² (593.844 sq.ft.) and the Plinth Area (1 Floor) will be 220.7 m² (2,374.73 sq.ft.). The building will also have a lift and a fire exit.



Figure 3: The Proposed Layout of the Buildings, Access and Parking

Figure 4: External Façade or Building Sections ²⁵				
Category	External Façade/Building Section			
Category III (Type II) building				
Category IV (Type II) building				
One Bedroom apartment				

²⁵ See footnote 32.

Category	External Façade/Building Section
	- 115-201
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Figure 5: Layout Plan for Category III (Type 2)²⁶

²⁶ See footnote 32.



Figure 6: Layout Plan for Category IV (Type 2)²⁷

²⁷ See footnote 32.

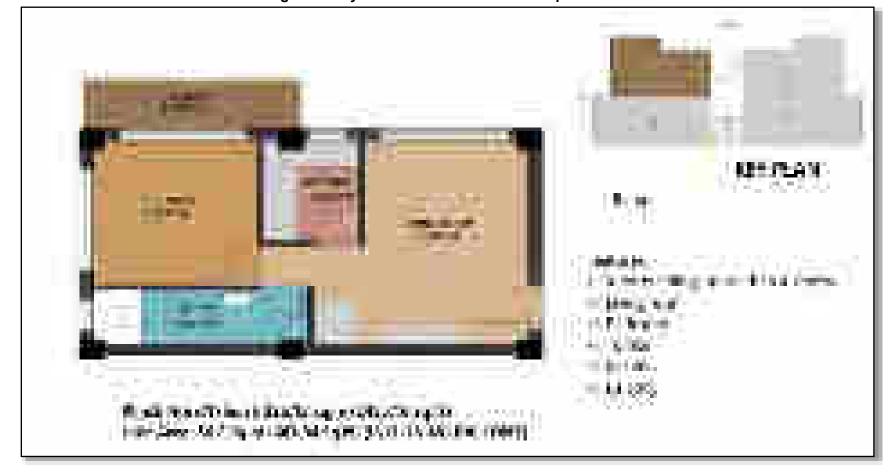


Figure 7: Layout Plan for One Bedroom Apartment²⁸

²⁸ See footnote 32.

- 66. **Site preparation works**. This will include demolition works, site clearance, tree felling and handing over of the site to the Contractor. The demolition work package is under preparation by NHDCL and will be awarded to a contractor, who will prepare a demolition plan and retain the salvage materials.
- 67. **Water supply details**. The supply of water for the housing complex will be from municipality through the existing water supply line in the area. The municipality is responsible for ensuring regular supply of water to all buildings within the locality. The design assumes five persons to reside in each unit in the larger category apartments, and three to reside in the single bedroom apartment, which translates to about 384 total residents in this housing complex. Each building will be provided with 4 2,500-liter overhead water tanks. On average each person will consume about 100 liters of water per day.

Table 14: Daily Water Requirement Calculation

Building	Total Number of Units	Number of Persons	Water Consumption
Category III (Type 2)	24	24 units x 5 persons/unit = 120 persons	120 persons x 100 liters/person = 12,000 liters
Category IV (Type 2)	24	24 units x 5 persons/unit = 120 persons	120 persons x 100 liters/person = 12,000 liters
1 BHK Apartment	48	48 units x 3 persons/unit = 144 persons	144 persons x 100 liters/person = 14,400 liters
Total for Residential E	Buildings		38,400 liters

68. **Rainwater harvesting**. To further supplement the water storage tanks, a 2,500-liter rainwater storage tank will also be installed on the upper slopes near the water tanks. Figure below shows the rainwater harvesting tank details.

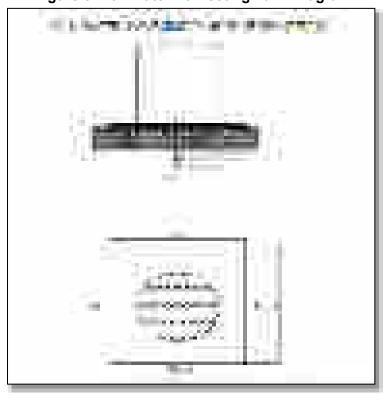
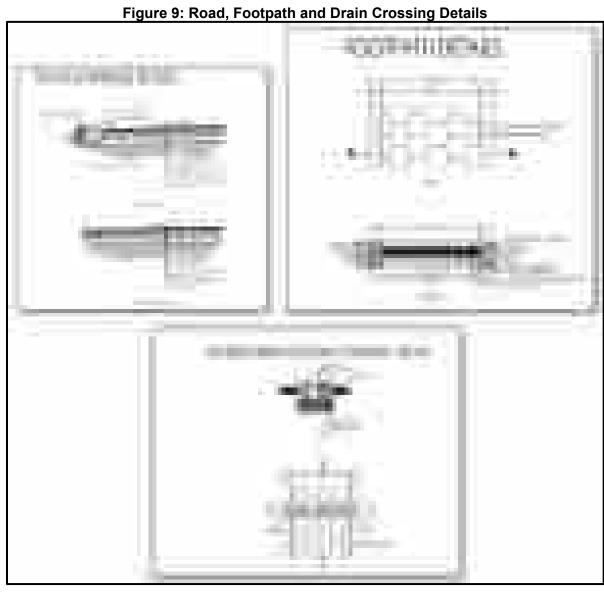
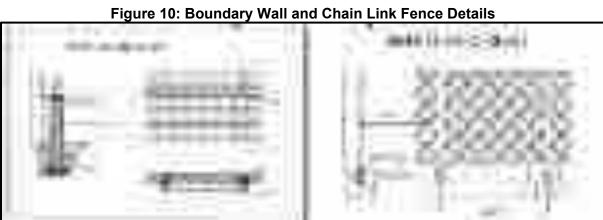


Figure 8: Rainwater Harvesting Tank Diagram

- 69. **Electrical power supply**. Although the existing buildings adjacent the site are already connected to the power supply, due to the substantial increase in number of apartments, this will not suffice. The NDHCL will outsource the design and technical requirements for this to the Bhutan Power Corporation that will assess the electrical requirements, provide the technical specifications and install the substation and required distribution lines. The cost of this will be borne by NHDCL.
- 70. **Septic tank and soak pits**. The site is connected to the central sewer system of Phuentsholing Thromde. Therefore, septic tanks are not required in the site.
- 71. **Plumbing and Sanitation.** The plumbing and sanitation design are in compliance with applicable plumbing codes of practice. The designs include details on kitchen, bathroom and WC outlets; manhole; and layout plan of the internal plumbing system of each floor, with details of pipe sizes and material. Water meters will be provided for each dwelling unit; the building drains will be connected to the secondary storm water drain of 450mm wide and the secondary storm water drain will be connected to main storm water drain of 900mm wide that runs N-S through the site
- 72. **Site accessibility, entry, exit and internal roads**. The proposed main access to the site is from the proposed lap road. There will be only one entry and exit for the site. In the site the parking is designed to accommodate 36 light vehicles and 22 two-wheelers. Figure 3 above shows the road and parking details. From the main parking, internal roads to connect each building will also be accessible through the pedestrian staircase from the Parking. The housing complex will have a boundary wall with chain link fencing. Sectional details of these allied infrastructures as shown in Figure 9 and Figure 10 below.





Building Construction Materials and Construction Technology

- 73. **Building construction materials.** Building materials to be used include (i) steel for footing, columns, beams and slab; (ii) Random Rubble Masonry (RRM) wall for foundation; (iii) hard stones for stone filling; (iv) cement, sand, and graded crushed rock for concrete works; (v) Aerated Autoclaved Concrete blocks (AAC) for walls; (vi) timbers for door and window frames; (vii) tiles for flooring; (viii) Unplasticized Polyvinyl Chloride (UPVC) for windows; (ix) mild steel for railings; (x) steel tubular truss; and (xi) Pre-Painted Galvanized Iron (PPGI) sheet for roofing. For toilets and drainage, materials to be used include (i) Chlorinated Polyvinyl Chloride (CPVC) pipes; (ii) HDPE Pipe; (iii) Indian-type vitreous water closet squatting pan; and (iv) European-type vitreous water closet pedestal for plumbing and sanitary works.
- 74. Specific to major construction earth-based materials such as aggregate, sand and stone, these will be sourced from local authorized suppliers from Phuentsholing. Other materials such as plywood, tiles and bathroom fixtures will be purchased from local suppliers or directly from India.
- 75. **Construction Technology**. The contractor will engage earth moving equipment, excavators, tower cranes if available, prefabrication of doors and windows off site, use of construction management software to manage, monitor and ensure timely delivery of projects.
- 76. **Disaster and emergencies.** The buildings are designed for seismic performance (IS 1893:2016, Zone V, Z=0.36, I=1.37, R=5, Damping=5%). As the site is on flat terrain there is no landslide risk. There is also no flood risk since the site is at relatively higher elevation with no history of flooding or water logging. As well, there are no rivers within the 300m of the site.
- 77. **Fire safety**. In terms of fire safety, the building designs are in compliance with the Bhutan Building Standard (BTS)-014 and Part 6 of the Building Code 2018. According to the Code, Exits must be located so that the travel distance to the exit on each floor does not exceed the distances set out in the table at the foot of this clause. For Residential Building the travel distance is 22.5m.
- 78. Each building will be provided with a fire dry hydrant, that will be utilized when the fire engines is mobilized from the Thromde during a fire emergency. A Hose pipe will be stored in the staircase landing area of the selected building.
- 79. **Solid Waste Management**. Waste is collected by a registered private waste collector from 4,360 of 6,000 individual households. Within the city, waste collection is carried out twice a day. On an average, 8 9 tons of solid waste is collected from the Thromde per day.²⁹

²⁹ MOWHS 2019, Annual information bulletin -material source -Phuentsholing Thromde



80. All waste is transported to the landfill site, which is located at Toribari (marked W on the map below) which is about 7km away. This landfill site will also be used to dispose construction waste (after segregation of recyclable, reusable and hazardous waste), unless otherwise instructed by the Thromde.

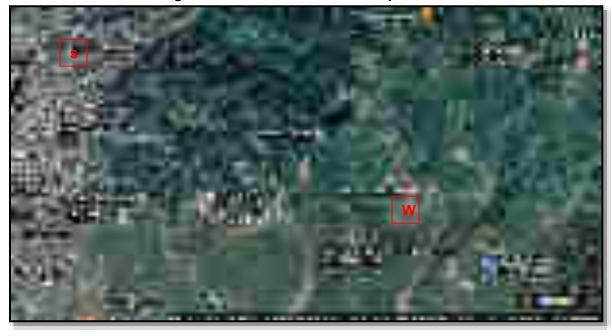


Figure 12: Location of Waste Disposal Site

81. **Green area and landscaping**.11.48% of the land will be left as green area. The green area is well located and easily accessible to all buildings through pedestrian footpaths. Once the construction is over, the green area as well as periphery of the site will be planted with local species. Although the plan for the green area is still under process, much of this area will be left as open space with a few benches and tables.

82. **Aesthetics**. The architectural drawings will comply with the Bhutanese Architecture Guidelines 2014 and the external façade of the buildings will be compatible with existing buildings and structures in the local area. Wherever possible, local building materials will be used.

E. Subproject Implementation Schedule

83. The preliminary design works have already begun and once the final approvals have been obtained, the contract works will be advertised. Site works are expected to begin as soon as contractors are selected. The construction work will be complete in 18 months as per the schedule given below.

Table 15: Work Schedule

	Activity	Months Period				
		1-2	3-4	4-6	6-32	33-39
1	Approval of architectural drawings					
2	Preparation of BOQ					
3	Advertisement, selection and contract award					
4	Establishment of PIU and supervision team					
5	Site development works (3 months)					
6	Construction (24 months)					
7	Post development works (6 months)	_	·			

F. Resource Utilization

- 84. The construction of the buildings will require a significant amount of resources. With the design process still ongoing, the total required amount of each resource is yet to be quantified. In general, however, the major construction materials required include stones, aggregates, sand, cement, autoclaved aerated concrete blocks, Glass-fiber reinforced concrete (GRC), glass, steel and timber. Most of the materials will be sourced from local authorized suppliers within Phuentsholing and Thimphu.
- 85. Approved construction materials approved will be sourced from local Bhutanese manufacturers (TMT rods, bricks, cement) but others such as tiles, paints, lights, plumbing and interior fixtures will most probably be imported from India (or otherwise as determined by NHDCL) as Bhutan does not manufacture these items.

IV. DESCRIPTION OF THE ENVIRONMENT

A. Baseline information

- 86. The Thromde lies within Phuentsholing Dungkhag (Sub divisional district), which is administratively part of the 1882.38 km² ChukhaDzongkhag.³⁰ Phuentsholing Thromde is located on the southwestern border of the country. It is the western point of entry by road and the primary gateway from India to Bhutan and because of this, it has easy access to cheap labor and raw material. It is the western commercial and economic capital as well as an industrial hub due to the Pasakha Industrial area where much of the production and manufacturing industries are located.
- 87. Phuentsholing was established as a Class A Thromde by the Parliament in 2010 with an area of 15.6 sq km³¹ and development in the municipality was guided by the Phuentsholing Urban Development Plan (PUDP) 2002-2017 wherein Phuentsholing was demarcated into various zones (residential, commercial, mixed use). Changes made in the PUDP 2002-2017 and harmonized in the Phuentsholing Structure Plan (PSP) 2013-2028.³² Under the PSP, the thromde area was defined by precincts and 11 Local Area Plans (LAPs).

Map of Bhutan

Map of Phuentsholing Thromde

Source: MOWHS, 2019 and 2010.

³⁰http://www.chhukha.gov.bt/index.php/about-district

³¹ MOWHS, 2010. Approved Thromdes and Boundaries

³² Department of Human Settlement, 2016. Compliance and development review Phuentsholing Throm. MOWHS

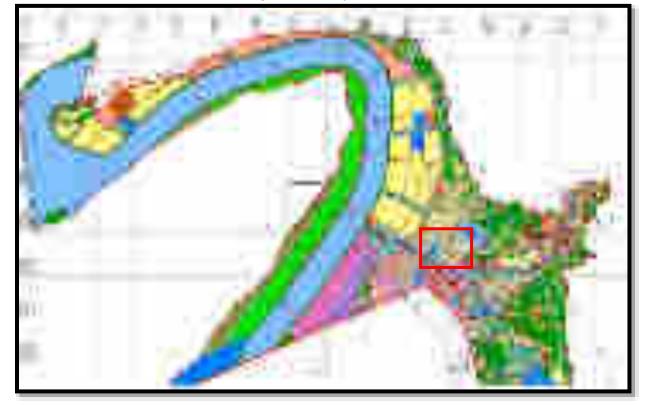


Figure 14: Project Site

Source. Phuentsholing Thromde

88. Phuentsholing Thromde extends from Amochhu to Pasakha along the southwestern foothills. It comprises of six constituencies (Demkhongs), each represented by an elected people's representative (Tshogpa). It has 11 Local Area Plans, all of which are under implementation except for Pasakha and Allay.



Figure 15: Delineation of Clusters and Zones of Phuentsholing Thromde

89. The site is currently the Drungpa's residence and lies in Cluster No.17, Core Zone III. The area falls under urban village within the town core and the permissible land use is mixed (all types of residential dwellings including apartments and group housing, professional services, commercial, institutions, etc.). The land user certificate has been issued for 0.85 acres (approximately 0.34 hectare) (Plot # PGT-4027) for construction of affordable housing. The site is accessible from the main road and the site is surrounded by private buildings and parking area on all four sides.



Figure 16: Proposed Subproject Site

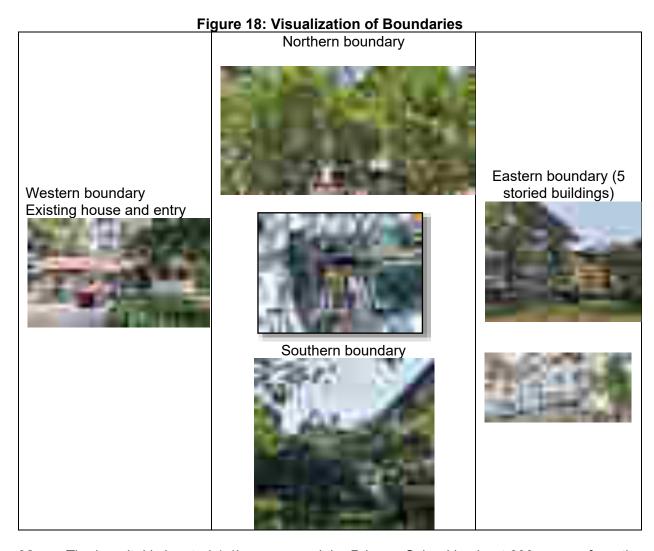
Source: NHDCL

B. Subproject Influence Area

90. The major environmental impacts during both construction and operational phases (e.g., drainage congestion, noise/air pollution, water/environmental pollution, traffic congestion) are unlikely to affect areas beyond 200m from the subproject site. Thus, the 200m from the subproject boundaries are considered as the subproject influence area.



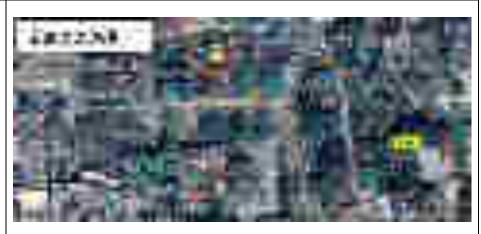
91. Figure above and below show immediate receptors on the four boundaries (North, South, East and West). There are tall buildings housing apartments and offices towards the eastern boundaries. Towards the front of the site, along Pelkhil Lam, there are shops and restaurants on the ground floor with apartments and offices above. The Thromde Office is across this road, less than 5 minutes walk from the site.



92. The hospital is located 1.4km away and the Primary School is about 600m away from the site. The closest religious structure is the Zangtopelri Lhakhang that is located in the center of the town, about 300m west of the site. The closest river is the Omchhu that is located 300m away but separated by roads and buildings.

Table 16: Distances of Receptors Around the Subproject Site

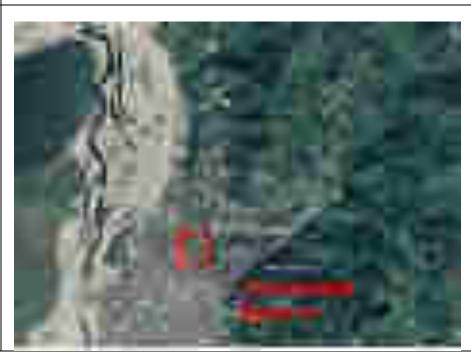
Physical Cultural Resource, 200 meters away



Closest river-Omchhu- separated by roads and buildings (at a lower elevation from the site), 300 meters away



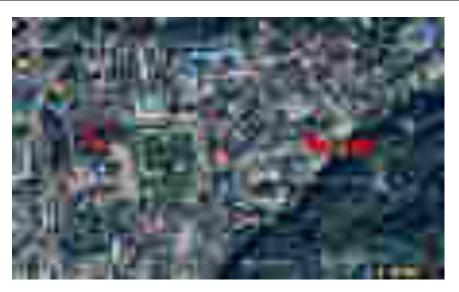
Closest forested area is more than 5km away



Location of Phuentsholing Hospital from the site, 1.4 km away



Location of the school from the site, 600m away



C. Land Environment

- 93. **Land Use, Topography, and Geology**. Bhutan has very rugged terrain with elevations ranging from 160 meters to more than 7,000 meters above sea level.³³ Phuentsholing Thromde occupies an area of 15.6 km² or 1,560 hectares, which is mostly at elevations of less than 160-600m within the wet sub-tropical agroecological zone.
- 94. Bhutan has three geological zones and Phuentsholing lies in the Frontal Belt that makes up the foothills and parts of the Lesser or Lower Himalaya. This Frontal Belt consists of recent

³³ NSB. 2020. Statistical yearbook of Bhutan 2020. National Statistical Bureau

deposits of sand, gravel, and boulders in the foothill terraces. The geology in Phuentsholing area, called the Phuentsholing Formation of Baxa Group of rocks, consists of variegated phyllite (which is highly weathered, fractured and at places decomposed to residual soil. It also comprises of talcose phyllite with thin bands of grayish white quartzite, limonitic quartzite, dolomite bands and basic rocks. Major tectonic and neo-tectonic activities have resulted in landslides at different structural levels along the slopes in Phuentsholing.³⁴

95. The soil map of the world prepared by Food and Agriculture Organization (FAO) of the United Nations and International Soil Reference and Information Centre (ISRIC) is used to extract the soil information for Bhutan. The scale of the latest available soil map is of 250 meters grid; therefore, it is the best available data to extract the soil information for the project areas.

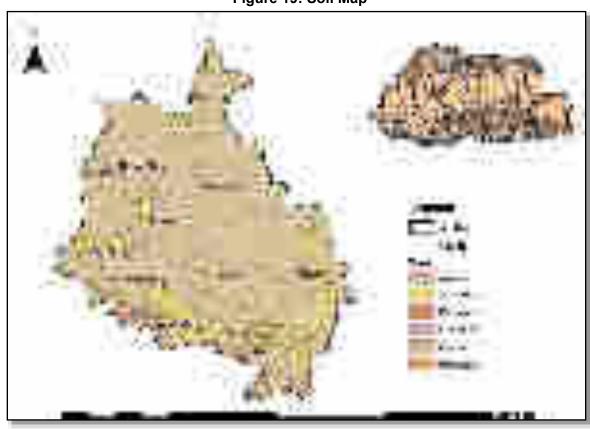


Figure 19: Soil Map

Source: FAO and ISRIC (International Soil Reference and Information Centre)

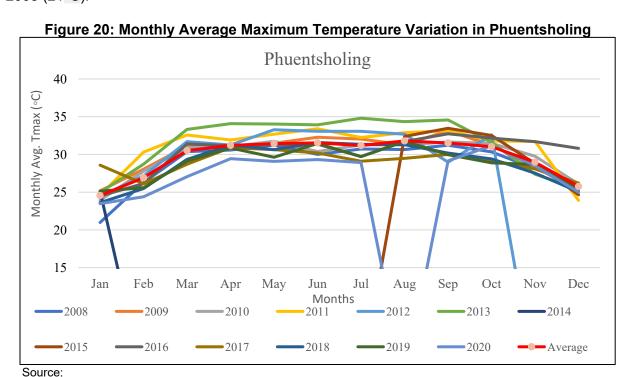
96. Chukha Dzongkhag has 5 types of soil excluding the glacier/ice. Luvisols soil type 35 is found covering about 80.36% of the total area of the district. Cambisols soil type covers an area of 326.88 km 2 (17.44%) while leptosols covers only about 13.43 km 2 (0.72%).

³⁴ UNDP/GEF. 2014. Addressing the risk of climate induced disasters through enhanced National and Local capacity for effective actions.

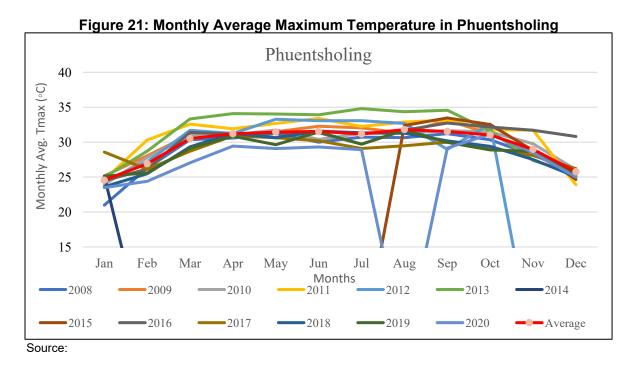
³⁵ Luvisols are technically characterized by a surface accumulation of humus overlying an extensively leached layer that is almost devoid of clay and iron-bearing minerals. Cambisols are soils at an early stage of soil formation and are categorized by the absence of a layer of accumulated clay, humus, soluble salts, or iron and aluminum oxides. The texture of the subsurface horizons is sandy loam or finer, with at least 8 percent clay by mass and a thickness of 15 cm (6 inches) or more. Leptosols are soils with a very shallow profile depth and they often contain large amounts

D. Air Environment

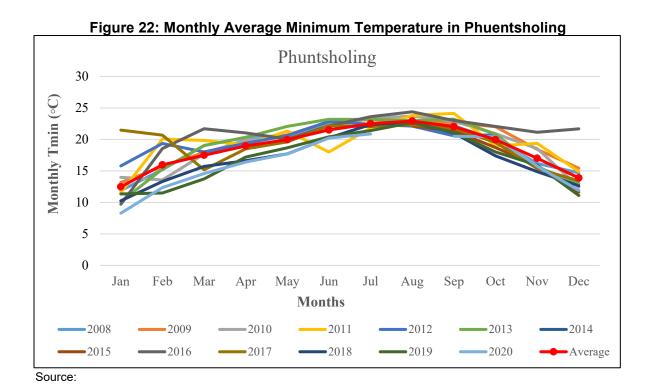
- 97. **Temperature**. The month of May, June, July and August experiences the maximum monthly average temperature and the monthly average temperature slightly declines from September.
- 98. The highest monthly average temperature from the year 2008 to 2020 was noted in July 2013 (34.8°C) while the lowest monthly average maximum temperature was noted in January 2008 (21°C).



of gravel. They typically remain under natural vegetation, being especially susceptible to erosion, desiccation, or waterlogging, depending on climate and topography



99. The monthly average minimum temperature from the year 2008 to 2020 in Phuentsholing is shown in figure below. The monthly average minimum temperature was in January 2020 (8.29 °C) while the highest average minimum temperature was in September, 2015 (10.1°C).



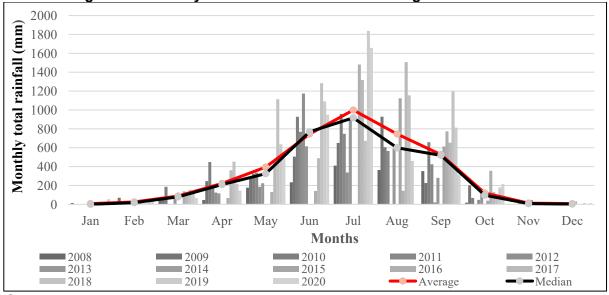
100. The table below shows the monthly long term average maximum and minimum temperature of Phuentsholing. The highest monthly average maximum temperature in Phuentsholing was recorded in August (31.8 °C) while the lowest was recorded in January (12.5°C).

Table 17: Long Term Monthly Average Temperature of Phuentsholing (2008 - 2020)

Tomporatura		Months										
Temperature	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Avg. Tmax (∘C)	24.5	26.9	30.5	31.2	31.4	31.5	31.2	31.8	31.5	31.0	29.0	25.8
Avg. Tmin (∘C)	12.5	16.0	17.5	19.0	20.0	21.5	22.5	22.9	22.0	20.0	17.0	13.9

101. **Rainfall**. The monthly total rainfall along with the long term monthly average total rainfall from the year 2008 to 2020 is shown in Figure 23. The month of July received the highest monthly average rainfall (998.78 mm) while the month of January received the least rainfall (7.42 mm) in Phuentsholing.

Figure 23: Monthly Total Rainfall in Phuentsholing from 2008 - 2020



Source:

102. **Ambient Air Quality**. To assess the ambient air quality, the National Environment Commission has a station at Rinchending to measure PM₁₀data each year. Although this station is about 5km from the city core, as there is no other station in Phuentsholing, this is considered indicative of the general air quality of the city center. The Kharbandi area is definitely less developed or crowded compared to the city center.



Table 18: Annual Average of the State of Air Quality in Phuentsholing, 2018 - 2019

Air quality parameters	2018	2019	Ambient air quality standard (mixed area)						
Station: Rinchending, Unit: μg/m³									
Total suspended particulate matter (PM ₁₀)	40.48	46.30	60.00						
Total suspended particulate matter (PM _{2.5})	24.15	30.08	40.00						

Source: Statistical Yearbook of Bhutan, 2020, NSB

103. Data for 2018, 2019 indicate that PM_{10} and $PM_{2.5}$ levels were lower than the national standard permissible levels. Data for PM_{10} levels in 2020 averaged 34.7 $\mu g/m^3$. Although this is lower than the required national standard, between November –March, the levels are much higher but when comparing individual months; the PM_{10} levels are high on individual day, but very high in general for February.

Table 19: PM10 Data for CST, Rinchending for 2020

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
29.35	0	36.17	73.20	18.65	18.96	26.43	14.70	40.07	17.80	21.71	23.02
34.09		35.60	52.19	18.32	25.72		17.95		21.49	20.39	28.76
46.97		25.55	66.41	13.84	31.71	16.39	15.54		37.43	46.16	19.05
22.46		35.79	70.66	15.27	21.70	16.42	10.36	22.32	19.19	99.28	
22.22	87.44	43.26	69.48	16.09	25.72	8.70	15.75	19.44	19.22	113.83	13.18
62.79	113.02	32.12	62.90		24.79	6.72	4.83	19.33	14.96	86.40	23.14
43.54	100.40	29.43	69.24	10.61		9.32	9.15	16.66	30.36	55.24	33.03
34.89	72.95	37.26	64.87	14.54		8.08	12.25	14.88	30.38	33.24	36.70
31.38	7.19	48.67		21.42		14.30	9.40	23.81	22.99	17.95	
59.17	68.08	58.48		21.95		9.91		23.05	-99.20	27.37	57.69
61.04	62.50	72.76		28.65		5.34	8.12		-4.54	15.21	60.29
52.18	76.84	81.06	38.88	23.31		15.83	13.69	9.45	29.71	22.93	45.79

48.32	92.81	75.67	43.54	26.57		14.79	3.49	29.36	23.92	29.22	97.18
55.81	124.37	47.11	46.18	25.25		14.70	0.40	23.03	-35.00	29.73	152.00
57.7	163.35	26.86	33.72	27.46		7.55		15.41	26.77	21.76	34.22
							0.04				
58.59	134.16	49.47	19.32	22.73		10.39	3.84	15.68	31.65	29.75	71.55
47.09	135.32	56.53		22.84		10.20	1.41	20.60	28.56	38.05	100.52
60.93	152.35	77.81	27.54	35.46			8.28	16.78	21.50	46.40	70.52
82.615	136.69	74.49	19.52	33.69	25.61	16.30	5.67	13.02	31.98		116.89
109.23	109.15	49.32		27.58	19.05		9.37	12.46	28.44	61.50	58.14
117.17	76.24	28.75	8.88	16.60	18.36	14.13	8.52		21.17	50.32	45.39
135.13	61.21	33.46	16.08		15.58	7.76	12.88	16.26	20.40	69.47	34.09
	43.29	20.73	23.64		17.97	13.75	10.00		12.56	68.84	47.22
	38.11	20.91		35.36	22.06	11.86	8.20		11.70	41.28	33.20
	30.59	-8.45	21.32				18.90	12.67	11.86	30.98	
	12.24	39.78	10.05	22.95		36.56	10.43	11.08	-19.69		
	10.99	66.45		14.13		15.06	10.61	15.89	17.00		
	-15.23	77.66	17.89	14.42		14.28	8.08	16.51	0.61	25.54	
	-12.76	74.88	13.60	13.05	13.57	22.54	18.49	24.56	13.34	24.69	
		87.29	15.18	14.66	13.37	20.89	16.96	21.80	17.26	23.78	
		64.66		13.24		17.54	21.31		14.45		

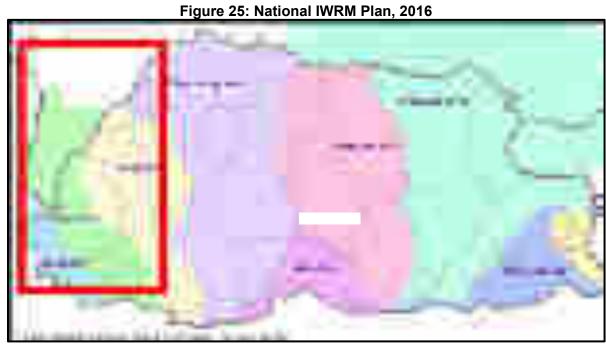
- 104. Due to its location along the border, the ambient air quality is also affected due to transboundary air pollution from the Indo-Gangetic plains, especially during winter months. 36 This could be one of the reasons for the high PM₁₀ data from November to February.
- 105. Site-specific ambient air quality will be obtained by the contractor prior to construction phase to provide a baseline data for reference during the monitoring activities.

E. Water Environment

106. Bhutan has an extensive river system that is generally distinguished by main rivers flowing north to south, with tributaries flowing in an east-westerly direction. The main rivers are Amochhu, Wangchhu, Punatsangchhu and Manas. The Amochhu river system has its origin in the People's Republic of China (PRC) and flows through the western Bhutan districts of Ha and Samtse before finally draining via Chhukha district onto the plains of India. The upper catchment is at a high elevation with steep slopes. Its source is Mount Pauhunri (7,128 meters (m) above mean sea level on the border with India and PRC. The catchment area down to Phuentsholing is approximately 3,785 square kilometers (km²).³⁷

³⁶NEC, 2016. Bhutan State of the Environment

³⁷ Phuentsholing Township Development Project



Source: NEC, 2016. Bhutan State of the Environment

107. The project site is located more than 500m of the Amochhu River and about 300m from the Omchhu/Dhoti Khola that flows through Phuentsholing town. See Figure below.

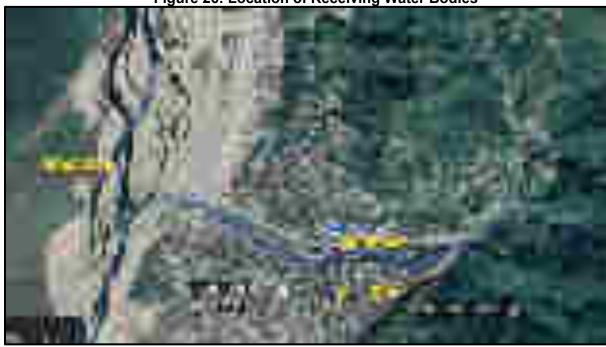


Figure 26: Location of Receiving Water Bodies

Source: Google Maps.

F. Acoustic Environment

108. Secondary information on noise levels was considered under this study. Information on noise levels is taken from noise level sampling that was carried out using the SL-1352 SOUND LEVEL METER at Toorsa tar village. The average noise level recorded was 51.6 dB(A) during the day.³⁸

109. The site is in a busy part of the city with many corporate offices, residences, shops and other businesses. Actual baseline noise level at the site will be measured prior to construction activities.

G. Ecological Environment

1. Forest cover and biodiversity

110. Broadly speaking, the country can be divided into three distinct Eco floristic zones (alpine zone, temperate zone and subtropical zone). According to the Department of Forest and Park Services, 81%³⁹ of Chhukha district is covered with forest. The primary forest types are broadleaf forest, mixed conifer with blue pine and fir at higher altitudes. Much of the Phuentsholing falls under the subtropical zone that comprise broadleaf forest. Species types vary with the level of rainfall and soil type- from deciduous on exposed dry slopes to almost evergreen in the moist valleys. In general, the forests are multi- storied and have high species diversity. Floristic

³⁸ DOR.2020. Initial Environmental Examination Report, 2020. BHU: South Asia Subregional Economic Cooperation Transport, Trade Facilitation and Logistics Project. Prepared by Department of Roads

³⁹ DOFPS, 2019. Forest Facts and Figures 2019.

composition consists of tropical species like *Shorea robusta, Terminalia myriocarpa, Bombax ceiba, Daubanga grandifolia, Sterculia villosa, Acacia catechu, and Terminalia nudiflora.*⁴⁰

111. Within the 15.6 km² area only 28% is classified as green areas. This includes forest, parks and open areas. The project site is an area with residential land use located at the center of the town. Within the boundaries of the site, there are several fruit trees (Mango (9), Litchi (2), Papaya (3) Banana (2), Guava (2), Betel nut (22) and other trees Asoka (12), Albizia (5) and Yushinia/Bamboo (small patch) with and climbers. All the trees belong to the government.

2. Protected Areas and Critical Habitats

112. There are no legally protected areas, buffer zones or critical habitat areas in the vicinity of the any of the sites. The closest protected area is Phibsoo wildlife sanctuary which is more than 80km away and separated by the Sunkosh River. There are also no wetlands within the project area of influence.

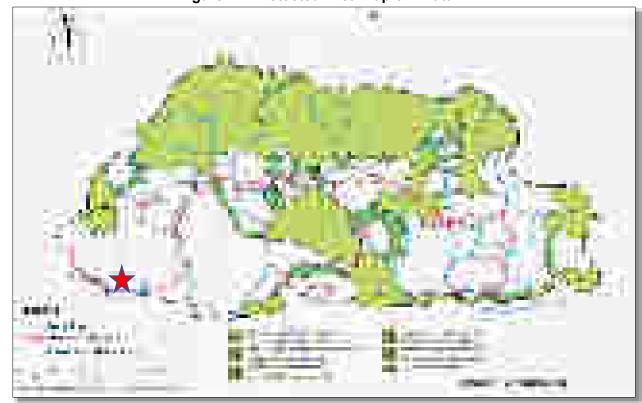


Figure 27: Protected Area Map of Bhutan

Source: Report-on-Nganglam-Regional-Hub-Development-Plan-1. MOWHS, 2018

113. **Critical Habitats**. In order to ensure that the assessment of impact is robust, a biodiversity assessment has been undertaken relative to the subproject location. The Integrated Biodiversity Assessment Tool (IBAT) was used to screen and assess potential risks on the protected areas or critical habitat that may exist around the project site (default area of analysis of 50 km radius). Screening results show that there is no key biodiversity area (KBA) within 1 km from the subproject site, and that 34 IUCN Red List species of concern are identified within the default

4

⁴⁰ NBC. 2014. National Biodiversity Strategies and Action Plan of Bhutan, 2014. National Biodiversity Centre, Ministry of Agriculture and Forests, Royal Government of Bhutan

area of analysis. See Appendix 5 for the complete results. The IUCN Red List species of concern were assessed to determine the likelihood of them being found at the subproject site. Since the subproject site is already within the center of the city, the likelihood of these species being found at the site is very low. Nevertheless, the assessment included necessary written confirmation from the Department of Forest, which confirmed that none of these species are found or sighted at the subproject site. Accordingly, these species are found or dwell in the denser forest further and farther upslope of the district.

H. Socio-economic Environment

- 114. **Demography**. The total population in Chhukha Dzongkha as of 2017 was 68,966 persons (36,041male and 32,925 female). The total population of Phuentsholing Thromde was 27,658 of which 15,052 were male and 12,606 were female (NSB, 2017) but the MoWHS estimates the population to be closer to 30,000 including floating population.⁴¹ In total there are 6817 households within 15.6 km².⁴²
- 115. **Educational and health facilities**. Within the Thromde, there are 4 private ECCD centers, 1 Lower Secondary School, 1 Middle Secondary School, 3 Higher Secondary Schools (2 are privately owned) and 3 autonomous schools (Primary, middle and secondary schools). Within these there are 4749 students (2359M, 2390F). The closest school (Primary school) is 600 m from the site.
- 116. There is only one general hospital serviced by 12 doctors, 39 nurses and 7 health assistants. This is 1.4km from the site.
- 117. **Municipal Services and Amenities**. In total 1410 buildings/houses have access to safe and 24/7 drinking water. There are 3 functional water supply schemes with three treatment plants (South treatment plan- 2000 m³; North treatment plant- 2000 m³ and Kharbandi treatment plan 500 m³). 1190 households have PF toilet.
- 118. Water supply and electricity is available at all sites through the municipal water supply and Local electrical system of the Bhutan Power Corporation. Although half of the households (3311 of 6817 households)⁴³ are not connected to the sewerage network, the selected site is part of the central sewerage network.
- 119. The total length of road (including all types of roads) is 57.15km.⁴⁴ There are two bus stops, 1 is the bus terminal and the other for the city bus. A new multilevel car parking has been recently constructed in the city center, which is closer to the Omchhu River (about 300m away).
- 120. For recreational purposes, the Thromde has one archery ground, 5 open gyms, one multipurpose hall, 4 football grounds and 7 basketball courts.
- 121. Waste is collected by a registered private waste collector from 4360 of 6000 individual households and transported to the landfill site, which is located at Toribari. The landfill site was commissioned in 2015. From an area of 3025acres (including access road) less than 2 acres is under use. Within the city, water collection is carried out twice a day, but the frequency decreases

⁴¹ MOWHS, 2019. Annual information bulletin

⁴² GNHC, 2017. 12th-FYP_Vol-III_Phuentsholing-Thromde

⁴³GNHC, 2017. 12th-FYP_Vol-III_Phuentsholing-Thromde

⁴⁴ Phuentsholing Thromde, 2017. Annual performance reporting for the year 2017.

towards the periphery to once a week, due to inadequate waste collection vehicles. On an average 8-9tonnes of waste is collected from the Thromde per day.⁴⁵

- 122. Phuentsholing is not a tourist destination for international travelers. However, it is both a transit route and for weekend visits for Indian tourists, especially during vacation time in India. In 2018 and 2019 there were 202,290 and 243,400 regional arrivals of which 95% were from India. More than half (55%) of all travelled by road entering Bhutan through Phuentsholing. In terms of tourist accommodation, Chhukha (including Phuentsholing) has only 12 three-star hotels and many other smaller ones but no four or five star hotels as compared to other tourist destinations in Thimphu, Paro or Punakha.⁴⁶
- 123. The subproject will be connected to the municipal sewerage system. Waste collection, transportation and disposal is contracted to a private waste provider.

G. Physical and Cultural Resources

124. There are only three Government owned Temples/Lhakhangs in Phuentsholing. These are the Palden Tashicholing Shedra (monastic school) is more than 500m away from the Site, the Zangtopelri about 300m away (in the heart of Phuentsholing town) and Kharbandi Goenpa (3km from the town center).

Figure 28: Physical Cultural Resource near the Subproject Site

Source: Google earth on web (delineation of site and PCR boundaries as shown on the map are only approximate).

H. Natural hazards

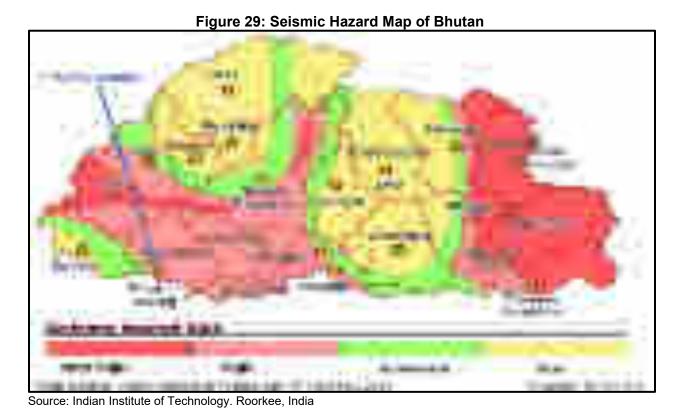
125. **Seismic hazard**. Geo-physically, Bhutan is located in the young Himalayan Mountains and considered to be one of most seismically active zones in the world, along the boundary between the Indian and the Eurasian tectonic plates. there is no detailed and comprehensive

⁴⁵ MOWHS 2019, Annual information bulletin -material source -Phuentsholing Thromde

⁴⁶ Tourism Council of Bhutan, 2018, 2019. Bhutan Tourism Monitor, 2018, 2019

seismic microzonation of Bhutan, it is assumed that the continent-to-continent collision resulting in a stress build-up in the Himalayan region places the country either in Zone IV or V due to its contiguity and proximity to the north-eastern part of India, which falls under the same seismic zonation according to the Bureau of Indian Standards. Based on the seismic hazard map of Bhutan, Phunetsholing lies in the boundary of high hazard zone (rated in a 4-point scale of low to very high). See **Figure 29** below.

126. Since 1980, a number of earthquakes have occurred in Bhutan (1980,1988, 2003,2006,2009,2011, 2012, 2014,2015). The limited information available on impacts of earthquakes is compiled in Annex 1. Of these the two recent and major earthquakes that occurred in 2009 and 2011 had devastating effects on Bhutan by earthquakes in neighboring India.



- 127. **Flood risks**. The flood depends on the distance of the site from the nearest river. Amochhu (Toorsa) and Om Chu are the two main rivers passing through the settlements in Phuentsholing Municipality. The flood hazard assessment for Chhukha Dzongkhag reported that these rivers deposit lots of sediment during monsoon within the city leading to change in the flow path of the river. The primary flood risk is due to the reduction in elevational difference between the riverbed level and the settlements along Amochhu river. On the other hand, the Omchu (Doti khola) is critical because it poses threat to lower part of the Phuentsholing town. In 2000-2001, 2km of retaining walls and embankment walls along the Omchhu were constructed along the length of the Phuentsholing town through ADB funding.
- 128. In terms of location, the project site is located more than 500m from the Amochhu with the entire zone I and II in between. The Omchhu is about 300m away from the site but is again buffered by multiples buildings and roads. There is no flood risk to the site.

129. In Phuentsholing the major causes of landslide is a) monsoon rainfall, b) geology and c) anthropogenic activities. There is no landslide risk for the center of the Thromde, as the site is on flat land and is not on a hillside.

V. ANTICIPATED ENVIRONMENTAL IMPACT AND MITIGATION MEASURES

A. Introduction

130. ADB SPS requires that all project activities need to be carefully assessed and considered to avoid and/or minimize negative social, religious, and cultural, and environmental impacts.

B. Impact assessment

- 131. The approach for the environmental assessment of this subproject involved the following steps:
 - (i) Review of baseline information on the project area and site location;
 - (ii) Initial environmental screening using ADB's Rapid Environmental Assessment (REA) checklist (Appendix 1) and No Mitigation scenario scoping checklist (Appendix 2):
 - (iii) Consultation with the design team on the proposed infrastructure design and plan;
 - (iv) Site visit and consultation with project staff; and
 - (v) Discussions between NHDCL, Thromde and current residents.
- 132. Several criteria were used for assessment. These include:
 - (i) Type/nature of activities proposed;
 - (ii) Project footprint/spatial scale of the proposed infrastructure work/magnitude of impact;
 - (iii) Likelihood of the impacts from occurrence;
 - (iv) Existing baseline conditions at the project site and within the project zone of influence, which in this case is up to 200m;
 - (v) Duration of the proposed activities and period of impact (short, medium, or long term); and
 - (vi) Requirements for compliance with national acts, rules and regulations and compliance with ADB policies.

Table 20: Likelihood of Impacts from Occurrence

Likelihood	Definition
Certain	Occurs under typical operating or construction conditions.
Likely	Occurs under worst case (negative impact) or best case (positive impact) operating conditions.
Occasional	Occurs under abnormal, exceptional or emergency conditions.
Unlikely	Unlikely to occur.

Table 21: Parameters for Determining Magnitude

Parameter	Major	Medium/ Moderate	Minor	Negligible
Duration of	Long term (more than	Medium Term	Limited to	Temporary
potential impact	35 years)	Lifespan of the	construction	with no
		project (5 to 15	period	detectable
		years		

Parameter	Major	Medium/ Moderate	Minor	Negligible
				potential impact
Spatial extent of potential impact	Widespread far beyond project boundaries	Beyond immediate Project components, site boundaries or local area	Within project boundary	Specific location within project component or site boundaries with no detectable potential impact
Reversibility of potential impact	Potential impact is effectively permanent, requiring considerable intervention to return to baseline	Baseline requires a year or so with some interventions to return to baseline	Baseline returns naturally or with limited intervention within a few months	Baseline remains constant
Legal requirements	Breaches national standards and or international guidelines/obligations	Complies with limits given in national standards but breaches international lender guidelines in one or more parameters	Meets minimum national standard limits or international guidelines	Not applicable
Likelihood of potential impacts occurring	Certain	Likely	Occasional	Unlikely

133. **Sensitivity of Receptor**. The sensitivity of a receptor has been determined based on review of the population (including proximity/numbers/vulnerability) and presence of features on the site or the surrounding area. Each detailed assessment has defined sensitivity in relation to the topic. Criteria for determining receptor sensitivity of the project's potential impacts are outlined in the following table.

Table 22: Parameters for Determining Significance

Sensitivity Determination	Definition
Very severe	Vulnerable receptor with little or no capacity to absorb proposed changes
Severe	Vulnerable receptor with little or no capacity to absorb proposed changes or limited opportunities for mitigation
Mild	Vulnerable receptor with some capacity to absorb proposed changes or moderate opportunities for mitigation
Low	Vulnerable receptor with good capacity to absorb proposed changes or/and good opportunities for mitigation

134. **Assigning Significance**. Following the determination of impact magnitude and sensitivity of the receiving environment or potential receptors, the significance of each potential impact has been established using the impact significance matrix shown in the table below.

Table 23: Significance of Impact Criteria

Magnitude of	Sensitivity of Receptors							
Potential Impact	Very severe	Severe	Mild	Low				
Major	Critical	High	Moderate	Negligible				
Medium	High	High	Moderate	Negligible				
Minor	Moderate	Moderate	Low	Negligible				
Negligible	Negligible	Negligible	Negligible	Negligible				

C. Summary of Impacts Rating for the Subproject

135. The subproject's potential impacts on the key environmental parameters have been assessed and their significance determined using the methodology described above. A summary of the potential impacts of the subproject on the key environmental parameters and significance of these impacts are presented in the following table.

Table 24: Summary of Rating of Potential Impacts

	Table 24.	Spatia	y or Kaung		Impacts		Significanc	Significance
	Duration of	I	Reversibl	Likelihoo		Sensitivit	e Prior to	after
Activity/ Impact	Impact	Extent	e or not	d	Magnitude	V	Mitigation	Mitigation
Design and Pre-Construction phase				-	3	,	3	
Land Acquisition – Change in land	Long term	Local	No	Unlikely	Minor	Mild	Low	Negligible
use				,				
Disruption of utilities and services	Short term	Local	Yes	Occasion al	Minor	Mild	Low	Negligible
Tree Removal	Long term	Local	No	Certain	Minor	Mild	Low	Negligible
Consents, Permits and Clearances	Short term	Local	Yes	Certain	Minor	Mild	Low	Negligible
Natural Hazards and Disasters	Long term	Local	Yes	Likely ^a	Medium	Mild	Moderate	Negligible
Community Awareness	Short term	Local	Yes	Certain	Minor	Mild	Low	Negligible
Construction Phase								
Worker recruitment -Occupational Health and Safety	Short term	Local	Yes	Certain	Minor	Mild	Low	Negligible
Construction of site office, worker	Short term	Local	Yes	Certain	Minor	Mild	Low	Negligible
camps and storage sheds, stockpile								
areas								
Demolition of existing house and	Short term	Local	Yes	Certain	Minor	Mild	Low	Negligible
shed								
Excavation	Short term	Local	Yes	Certain	Medium	Mild	Moderate	Negligible
Water supply	Will be provide			ater supply				
Electrical connections	Substation will	be installe					1	_
Mobilization of construction	Short term	Local	Yes	Certain	Medium	Mild	Moderate	Negligible
equipment and material								
transportation-traffic and congestion								
Air pollution	Short term	Local	Yes	Certain	Medium	Mild	Moderate	Negligible
Dust generation	Short term	Local	Yes	Certain	Medium	Mild	Moderate	Negligible
Noise Pollution	Short term	Local	Yes	Certain	Medium	Mild	Moderate	Negligible
Soil erosion and Sediment	Short term	Local	Yes	Certain	Medium	Mild	Moderate	Negligible
mobilization								
Ground water quality	Short term	Local	Yes	Certain	Minor	Mild	Low	Negligible
Drainage congestion	Short term	Local	Yes	Certain	Medium	Mild	Moderate	Negligible
Impact on critical habitat	Short term	Local	No	Unlikely	Minor	Mild	Low	Negligible
Impact on endangered species	Short term	Local	No	Unlikely	Minor	Mild	Low	Negligible
Impact on Physical Cultural	Short term	Local	No	Unlikely	Minor	Mild	Low	Negligible
Resources								
Socio-economic status/livelihood	Short term	Local	Yes	Certain	Minor	Mild	Positive	Positive

		Spatia					Significanc	Significance
	Duration of	I	Reversibl	Likelihoo		Sensitivit	e Prior to	after
Activity/ Impact	Impact	Extent	e or not	d	Magnitude	у	Mitigation	Mitigation
Community Health and Safety	Short term	Local	Yes	Certain	Minor	Mild	Low	Negligible
Aesthetic impacts	Short term	Local	Yes	Unlikely	Minor	Mild	Low	Negligible
Operation Phase								
Maintenance and operation of the housing complex	Long term	Local	Yes	Certain	Minor	Mild	Low	Negligible
Disaster and natural hazards	Long term	Local	Yes	Likely ^a	Minor	Mild	Low	Negligible
Resident health and safety	Long term	Local	Yes	Certain	Minor	Mild	Low	Negligible
Socio-economic status/livelihood	Short term	Local	Yes	Certain	Moderate	Mild	Positive	Low

^a Natural hazards/extreme events are likely to occur, but not predictable as to when these will occur.

136. The potential environmental impacts expected during the pre-construction phase are mostly due to the nature of the activity (Construction of buildings) and project location.

D. Anticipated Impacts and Mitigation Measures during Pre-construction Phase

137. Potential environmental impacts expected during the pre-construction phase are mostly due to the design and location and are discussed as follows:

1. Impacts Due to Project Location

(i) Protected areas, critical habitats and endangered species

- 138. **Impact**. The site is located within the city center of Phuentsholing Thromde and is surrounded on all sides by buildings, settlement and roads. There are no legally protected areas or environmentally sensitive areas in the vicinity of the site. The closest protected area is Phibsoo wildlife sanctuary which is more than 80km away. There are also no wetlands within the project area of influence.
- 139. As presented in Chapter IV of this IEE, the Integrated Biodiversity Assessment Tool (IBAT) was used to screen and assess potential risks on the protected areas or critical habitat that may exist around the project site (default area of analysis of 50 km radius). Screening results show that there is no key biodiversity area (KBA) within 1 km from the subproject site, and that 34 IUCN Red List species of concern are identified within the default area of analysis. The IUCN Red List species of concern were assessed to determine the likelihood of them being found at the subproject site. Since the subproject site is already within the center of the city, the likelihood of these species being found at the site is very low. Nevertheless, the assessment included necessary written confirmation from the Department of Forest, which confirmed that none of these species are found or sighted at the subproject site. Accordingly, these species are found or dwell in the denser forest further and farther upslope of the district.
- 140. **Mitigation.** No mitigation is required.

(ii) Physical Cultural Resources

- 141. **Impact.** The closest physical cultural resource (PCR) is the Zangtopelri which is in the center of the town, about 300m away from the subproject site and separated by buildings, roads, and other establishments. Field assessment confirmed that there is no way that the subproject activities will impact the PCR.
- 142. **Mitigation**. No mitigation required. The upfront site selection criteria used under the project also ensured that planned development for the site will not result in destruction of or encroachment onto physical cultural resources such as archaeological monuments; heritage sites; and movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance.

(iii) Risk of natural hazards such as earthquakes and climate change considerations

143. **Impact.** The project site was assessed in terms of earthquake, flooding and landslide risks. Due to its location (proximity to the north- eastern parts of India, which are in the 'most

active' seismic Zone V), the projects site is at High risk of earthquakes. Apart from seismic risks, the risk for flooding and landslides is 'Low" as the site is away from rivers and streams and is on flat terrain.

- 144. The main associated risks and impacts in the design phase are insufficient building design and non-compliance to the plans, regulations and building codes which could result in limitations and inappropriate design without adequate consideration for seismicity and other natural hazards including climate change.
- 145. **Mitigation for earthquakes and climate change events.** The design process has taken into consideration the requirements of Bhutan Building Regulations 2018 and other relevant rules or regulation as discussed in Chapter II of this IEE. The proposed project will also be guided by the Phuentsholing Urban Development Plan 2002-2017 and Phuentsholing Structure Plan 2013-2028. Compliance with these rules, regulations and plans implies that the structural design will have considered and incorporated measures to minimize the risks of earthquakes.
- 146. Climate considerations will also be taken care of through choice of building materials, which must be suitable for monsoon rains. The approval process ensures that natural hazards, climatic conditions, and local areas plans are duly considered. Any changes to approved plans will be resubmitted to the Development Control Division, Thromde Office.
- 147. The NHDCL has accumulated much experience in planning, designing and executing the construction of affordable housing projects around the country. In 2017, 41 buildings were contracted out to 7 large contractors, of which 21 buildings were completely built in December 2018, and 20 buildings were completely built in early 2019. From these, 506 housing units were completed and allotted to the tenants in Phuentsholing.⁴⁷

(iv) Disruption of existing utilities and services

- 148. **Impact.** There are no existing utilities and supply lines passing through the site.
- 149. **Mitigation.** No mitigation required.

2. Consents, Permits and Clearances

- 150. All developments within the city is controlled by the Municipality, which is responsible for ensuring that development activities are aligned with the local area plan for Phuentsholing. Without approval of the subproject plan by the Phuentsholing municipality, subproject implementation may not be able to proceed.
- 151. **Mitigation**. Site surveys and preliminary designs have been completed and the detailed design is under process. The construction approval process is standard. The land ownership certificate, official site plan along with the structural, electrical, sewerage, water supply and plumbing drawings certified by the design team will be submitted to the Development Control Division (DCD) of the Thromde. If the designs and drawings meet all the requisite requirements as per the rules, standards and guidelines, construction approval will be granted. If there are any reservations from the DCD, Thromde, this will be communicated back to the design team for rectification and revision of drawings.

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⁴⁷ NHDCL, 2019. Annual Report, 8th Issue.

3. Tree removal

- 152. **Impact.** There are 18 fruit trees, 22 Betelnut and 17 other trees species as well as the Bamboo patch that will be removed at the site.
- 153. **Mitigation**. The permit for tree felling will be sought from the Environment Division, Thromde Office prior to initiating the work. Once this is done, the trees can be cut. The cost of compensatory plantation will be incorporated into the budget. For every tree cut, double the number will be planted. However, since the site is already so small, and there is no room to plant double the number of trees, this compensatory measure will be offset in other housing sites such as Rinchending, where tree planting will be beneficial for slope stabilizations works.

4. Construction schedule, cost estimation and bidding process

- 154. **Impact.** There is a general lack of awareness by most contractors on ADB SPS and EMP requirements, and this is the reason why mitigation measures are not normally budgeted in the contract cost. Due to COVID 19 restrictions, there is also a huge shortage of skilled national workers.
- 155. **Mitigation**. The procurement unit will incorporate the cost of OHS and the EMP as well as specific provisions requiring contractors to comply with all other conditions required by ADB into the bidding and contract document. Once the contractor is selected, the PIU will arrange to conduct awareness for contractors on their responsibilities in EMP implementation, in compliance with ADB and RGOB requirements, self -monitoring and reporting procedures.
- 156. The construction schedule must consider the current shortage of skilled manpower and constraints in importing foreign workers due to the COVID 19 pandemic so that the construction is completed on time.
- 157. The Bhutan Schedule of Rates 2020 includes a Guideline for Occupational Health and Safety Cost to be used by procuring agencies for estimating the Bill of Quantities for each contract.⁴⁸ Inclusion of the Cost of OHS is the minimal mandatory requirements for a construction site. In addition to this, the Contract must specify that the minimum age of employment shall be 18 years and the contractor is liable for the cost of providing accident compensation for all the employees in case of work-related injury or accidents.
- 158. Due to the high demand for waste disposal in Phuentsholing and the uncertainty in terms of the waste disposal location for excavated soil, the cost of transportation of waste from the construction sites must be incorporated into BOQ to avoid additional claims or improper disposal of waste.

5. Compliance to ADB Loan Agreements and Safeguard Policies

159. **Impact.** There is a general lack of awareness by most contractors on ADB SPS and EMP requirements, and this is the reason why mitigation measures are not normally budgeted in the contract cost. Due to COVID 19 restrictions, there is also a huge shortage of skilled national workers.

⁴⁸Department of Engineering Services, MoWHS, 2020. The Bhutan Schedule of Rates - 2020 includes a Guideline for Occupational Health and Safety Costs.

- 160. **Mitigation**. The procurement unit will incorporate the cost of OHS and the EMP as well as specific provisions requiring contractors to comply with all other conditions required by ADB into the bidding and contract document. Once the Contractor is selected, the PIU will arrange to conduct awareness for contractors on their responsibilities in EMP implementation, in compliance with ADB and RGOB requirements, self -monitoring and reporting procedures.
- 161. The construction schedule must consider the current shortage of skilled manpower and constraints in importing foreign workers due to the COVID 19 pandemic so that the construction is completed on time.
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6. Project Disclosure and Community Awareness

163. **Community awareness and project disclosure**. The neighboring community must be informed of the project activities and schedule so that they are well informed and aware of the project activities in advance. The first round of consultation with project affected families and current residents has already been carried out. The project must disseminate information on the objectives of the proposed project, the preliminary design of proposed project components; potential environmental and social impacts (positive and negative) of the project, and proposed mitigation measures for the perceived negative impacts; and the Grievance Redress Mechanism and contact details of the project. Project signboards must be designed and constructed according to the design standards and specifications of the Thromde. The signboards must disclose project contact information for easy contact for any issues or clarification.

E. Anticipated Impacts and Mitigation Measures during Construction Phase

1. Socio-economic impacts

164. **Impact.** The project will generate employment and business opportunities for local suppliers of construction materials as well as material transporters and machine operators. The socio-economic benefits of obtaining temporary employment in construction workforces, can be significant for low-income people within and outside Phuentsholing.

2. Site preparation and Construction of site office, worker camps and material storage sheds

165. **Impact.** Once the contract is awarded, the site will be handed over to the contractor by the PIU. There is however limited space in the city center at the Drungpa's Residence so the contractor might need to arrange off-site accommodation for his workers, especially as the available space on site could be more effectively used for material storage.

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⁴⁹ Department of Engineering Services, MoWHS, 2020. The Bhutan Schedule of Rates - 2020 includes a Guideline for Occupational Health and Safety Costs

166. **Mitigation**. If additional space is required to park machinery, build storage sheds or for other purposes, the PIU will assist the contractor (if required) to lease land, but the responsibility of finalization of land agreement and payments to the landowner or to the Thromde will lie with the Contractor. The contractor must set aside a secure enclosure/shed for the storage of cement, lubricants, solvents, paint, electrical and other breakable material. Fuel and other petroleum products must be stored at storage areas away from water drainage and protected by impermeable lining and bunded.

3. Recruitment and management of workers

- 167. **Impact.** The COVID 19 safeguard restrictions on recruitment of foreign workers will require the contractor to hire national workers. This will significantly and positively benefit the current economic and unemployment scenario by providing local employment and benefit sharing. However, it is generally still necessary to import foreign skilled workers because it is very difficult to find skilled national workers.
- 168. The presence of workers will increase the demand for services like temporary housing, drinking water and sanitation. There is also the risk of gender discrimination and potential health and safety impacts for female employees due to unclean sanitary facilities. A mix of local and foreign construction workers may cause social conflict and the sudden influx and large number of workers living together in one location may also cause disturbance to the neighborhood. The operation of construction camps will generate sewage and other waste from workers.
- 169. **Mitigation**. The contractor will be required to follow the rules and regulations for foreign and local worker recruitment and avoid recruiting workers below the age of 18. The contractor will strive to be gender sensitive by ensuring equal pay for equal work for female worker, brief workers on gender discrimination and sexual harassment. All foreign workers will be screened at their point of entry for the more virulent and contagious diseases, including HIV/AIDS, TB, Malaria, Dengue and COVID 19. The prevailing requirements of the Ministry of Health and the COVID Taskforce, which include mandatory quarantine requirement, and payments for quarantine, isolation and testing.
- 170. The Contractor will be required to provide workers with good quality temporary accommodation, with ample and safe drinking water, electricity and sanitation facilities with separate toilets for females. Worker camps will be self-contained, regularly cleaned and properly organized to handle waste issues according to the succeeding section on waste management. For good reference, the contractor will follow the standards for workers accommodation per guidance note by the International Finance Corporation and European Bank for Reconstruction and Development entitled "Workers' accommodation: processes and standards: A guidance note by IFC and the EBRD".
- 171. The contractor will be responsible for briefing all workers on required social behavior and imposing sanctions for inappropriate conduct. The number of complaints received from neighboring residents will be recorded with action taken.
- 172. The contractor with more than 12 workers must submit a Notification of Construction Work (in writing and as per the information required) within 7 days after the commencement of the work, to the Chief Labor Administrator, and also repeat the same within 7 days of completion of the work.

4. Occupational Health and Safety

- 173. **Impact.** The construction industry entails working at height, excavation, use of machinery and constant exposure to noise, dust, and equipment. Construction noise such as welding, use of excavators will cause more disruption to the machine operators or workers in close proximity to the machine. There is also the risk of workplace injury due to (i) lack of personal protective equipment (PPE), (ii) unsafe acts/carelessness or ignorance by workers, (iii) use of unskilled workers, (iv) working long hours with inadequate facilities, and (v) lack of dedicated personnel to ensure worker health and safety and lack of general safety awareness.
- **Mitigation.** To ensure the health and safety of worker, the contractor will be required to abide by the international best practices on occupational health and safety such as those in Section 4.2 of World Bank EHS Guidelines on Construction and Decommissioning Activities;50 and by Regulation on Occupational Health, Safety and Welfare, 2012, and nominate a Health and Safety Focal Person (or equivalent) who will have the overall responsibility to ensure safe working conditions and environment for all workers. The contractor will provide required and appropriate PPE (e.g. safety boots, helmets, gloves, protective clothes, dust mask, goggles, and ear plugs), at no cost to the workers, maintain a PPE issue register, and enforce its use with sanctions for non-compliance. Contractor will institute protocols to deal with accidents (including evacuation of injured person to the nearest hospital), emergencies and grievances at the worksite and communicate this to all workers. Briefings and awareness on health and safety and required social behavior will carry out during toolbox talks. To prevent accidents during electrical installation, only trained and competent electrical workers must be hired. The site will be provisioned with first aid kits and safety signage at critical and risky/precarious areas. Records of all accidents will be maintained including measures taken and workers will be compensated for work injuries and fatalities. The subproject site is located about 2-3km from the hospital, so easy access to health facilities is not a concern but the contractor must provide transportation during emergencies for workers.
- 175. The contractor will be required to institute minimum COVID 19 measures such as hand washing facilities, installation of the Druk Scan App for movement of visitors and workers, mandatory use of masks, social distancing norms and any other protocols as per the prevailing requirements of the Ministry of Health and the COVID 19 Taskforce.

5. Demolition of existing structures

176. **Impact.** The Drungpa's current residence which is a single storied structure will need to be demolished, cleared and in its place the new buildings will be constructed. This will cause dust, noise and result in demolition waste that needs to be properly disposed. It will also pose occupational risks to the workers.

⁵⁰IFC World Bank Group. 2007. Environmental, Health, and Safety (EHS) Guidelines – General EHS Guidelines: Construction and Decommissioning.



177. **Mitigation**. The PMU/PIU will seek the necessary permit for demolition from the Thromde and prepare a demolition plan that will address impacts on air and dust, noise, disturbance to the community, and workers' safety while ensuring that the entire process is completed within the planned period. Reusable construction materials will be segregated and reused wherever possible. Other demolition waste will be segregated into recyclable, non-recyclable parts and hazardous waste and accordingly dispatched to registered waste collectors. Unusable waste will be transported without spillage to the designated disposal site. The Occupational Health and Safety requirements such as briefing on safety, supervision of workers, safety during use of heavy machinery will be complied with.

6. Excavation work

- 178. **Impact.** Excavation work will be carried out for the footing of all the buildings. This will result in loose soil requiring space for storage and creating dust piles during windy days.
- 179. **Mitigation**. Most of the excavated material will be reused for filling in the building foundations and for levelling the parking and recreational areas. The remaining soil if any will be disposed in manner similar to the demolition waste at the Thromde-approved site. Also, dry sediment areas will be sprinkled with water to minimize dust.

7. Raw Materials Sourcing and Storage

- 180. **Impact.** The buildings will require a number of construction materials such as steel for footing, columns, beams and slab; random rubble masonry wall for foundation, hard stones for stone filling; cement, sand, graded crushed rock for concrete works, aerated autoclaved concrete blocks for walls, fiber-reinforced plastic for window frames and cornices, wood plastic composite for door frames, tiles for flooring, unplasticized polyvinyl chloride for windows, mild steel for railings, steel tubular truss, and pre-painted galvanized iron sheet roofing. For toilets and drainage, construction materials include chlorinated polyvinyl chloride pipes, high density polyethylene pipe, water closet squatting pan and water closet pedestal. All these materials will come from difference suppliers and locations. Storage of all these materials will also be an issue at the subproject site. Without proper planning on sourcing and materials may lead to implementation delays and loss of materials.
- 181. **Mitigation**. The quantity of material required will be estimated based on the final detail design and preparation of Bill of Quantities. Most raw materials will be imported but wherever possible, locally available building materials will be used.

- 182. Aggregate, sand and stone will be sourced from local authorized suppliers from Phuentsholing and Thimphu. Other materials such as plywood, tiles and fixtures will be purchased from local suppliers or directly from India as per the decision of the Contractor. To minimize wastage and to avoid storage issues, the Contractor will prepare and plan material requirement and delivery as required during each phase of the construction. The NHDCL will use preengineered material for the construction of the buildings structure. Pre-engineered material will be imported from India.
- 183. In terms of storage, the Contractor will schedule material procurement to prevent both shortage and storage issues, construct material storage shed, maintain inventory, and keep valuable items locked. He could appoint security guard to minimize the risk of losing construction material.

8. Water requirements

- 184. **Impact.** Much of the water for Phuentsholing is pumped from the ground and treated and stored in water reservoirs. There are three water treatment plants in Phuentsholing located in the South, North and Kharbandi with capacities of 2,000 m³, 2,000 m³, and 500 m³; respectively. Three additional water treatment plants will be newly completed, of which one is the Omchhu treatment plant with a capacity of 8 MLD. The construction work and the influx of a large number of workers is expected to create an additional demand for water for drinking, cooking, washing as well as construction and its associated activities (sprinkling/spraying and cleaning).
- 185. **Mitigation**. The Contractor will be required to ensure adequate water for domestic (drinking, cooking, washing and sanitation) and construction purpose. The existing water supply line will be utilized for this the project so there is no need to install new water pipelines. To reduce the risk of water shortages and to conserve water, the contractor will Install adequate water tanks or mobilize water tankers during periods of shortage. To conserve water, all water supply pipes will be checked, repaired and maintained to prevent leakages or blockages.

9. Electrical requirements

- 186. **Impact.** Electricity for the construction will be required for lighting and cooking in the worker camps, site office and use of construction tools, equipment and machinery. Without electrical power supply will delay project implementation at the site.
- 187. **Mitigation.** Within the municipality, the Thromde is responsible for provision such services. Currently, all the existing buildings are already connected to the electrical supply network provided by the Bhutan Power Corporation. During the construction period, the required electrical supply will be utilized from the existing power line to the NHDCL colony, with the approval of the BPC.
- 188. The construction of a substation with adequate electrical supply to cater to the additional residential units at the site will be outsourced to BPC, thereby ensuring reliable electrical supply to all the buildings once they operate or occupied in the future.

10. Sewerage Requirement

189. **Impact**. Without any adequate sewerage system at the site, discharge of greywater and blackwater from the site and workers' camp could pollute the receiving bodies of water in the area.

190. **Mitigation**. Any workers' camp and sanitation facilities to be temporarily built at the site will be connected to septic tanks which will be used until the end of the construction period, after which these will be decommissioned, cleared out and filled in with soil. If there is any available authorized provider in the city, movable portable toilets with septic tanks can be rented by the Contractor as an option, which can be desludged or emptied on a regular basis by the service provider.

11. Mobilization of Construction Equipment

- 191. **Impact.** The operation of vehicles and mobile construction equipment at the construction site are risky if adequate precautions are not followed. These hazards include risk of being struck or crushed by moving equipment or its load when being lifted or moved or due to mechanical failure or when machines tip over.
- 192. **Mitigation.** To minimize the risk to workers working nearby, the machine operators must be trained and competent and use the horn when backing, be assigned a signal person to guide him when reversing and workers must be restricted from working in close proximity during these periods, unless it is essential for assisting the use of the machine or for the intended work. In such cases, a supervisor should alert the worker of potential risks.

12. Erosion and Sedimentation

- 193. **Impact.** The monsoon months are the periods of heavy rainfall between June and September. From 2008 to 2020,⁵¹ the average annual rainfall was 5,700 mm. Of this, 52% occurred from June- September. If excavation work is carried out during the summer months, the heavy downpour will wash away the exposed parts of the site that could lead to heavy erosion and sedimentation in the area.
- 194. **Mitigation.** All excavation work should be mostly completed before the onset of the incessant rain to reduce the runoff. If this plan is not completely possible, any excavation work during rainy or monsoon season should be minimized. The site drainage will be planned to ensure that rainwater from excavated areas, worker camps and material storage areas do not cause erosion and sedimentation. The Contractor must construct temporary drains with silt traps to divert clean stormwater away from areas where loose excavated soil is exposed.

13. Ambient Air Quality

- 195. **Impact.** The air quality in Phuentsholing is worse in winter compared to summer months as shown in Chapter IV. The infrastructure works will further diminish the air quality due to the cumulative increase in air emissions from operation of machinery and vehicles that will contribute to the air pollutant load (primarily particulate matter (PM), NO_x, SO_x, CO etc.). However, much of the impacts on air quality will occur during the construction period.
- 196. **Mitigation.** The Contractor will ensure that construction equipment and vehicles are maintained in good condition and have passed the RSTA emission test. Vehicles transporting soil, sand and other construction materials and waste will be covered with tarpaulin sheets to reduce the release of dust along transport routes. Stockpiles of soil, sand and other construction materials will be covered to prevent it from being carried off on windy days.

⁵¹There was no data for 2014-2015.

197. **Workers' Camp**. The Contractor will provide alternative fuel (electricity or LPG) at workers' camp and restrict use of firewood for cooking. Burning of waste will be restricted and enforced strictly.

14. Dust Generation

- 198. **Impact**. Dust will be generated during demolition, excavation, transportation and unloading of sand and other construction materials as well as during material storage. Dust generated will potentially elevate the level of air pollution in the area in terms of particulate matter.
- 199. **Mitigation.** To prevent too much dust during demolition and excavation works, the area will be enclosed/cordoned with construction fabric. Water will be sprayed over bare or newly excavated areas especially on windy days. The excess excavated soil will be removed from the site within 2 weeks of excavation at disposed at the approved disposal site. Material transporters will be instructed to cover dust generating materials to prevent dust and spillage along transport routes.

15. Noise and Disturbance to the Neighboring Community

- 200. **Impact.** The construction site is surrounded by residential buildings and offices in the city center. During the construction period, the main sources of noise will be from construction activities such as use of welding machines, sawing of wood, concrete mixing, batching plant operation, excavators and movement of vehicles and trucks. The impacts from construction work will be most disturbing during early morning hours or late into the night.
- 201. Another source of disturbance especially in the evenings is from the workers camps when workers play loud music, engage in brawls or drunken behavior. All these impacts are centered on work sites and camps, and last until the end of the construction period.
- 202. **Mitigation**. Measures to minimize disturbance to the community include restricting construction work between 9PM -8AM,⁵² briefing workers on their obligations regarding proper management of work and behavior with sanctions for inappropriate behavior or repeated complaints from the residents. The vehicle owners will be encouraged to develop and implement a preventive maintenance schedule for all heavy construction equipment and machinery to minimize noise and vibration. The use of prefabricated materials and AAC blocks will also reduce the duration of the construction period.

16. Solid Waste Generation and Management

- 203. **Impact.** The major source of the waste will be from the site offices, worker camps and construction sites. The wastes will include mostly polyethylene terephthalate (PET) bottles, paper, plastics, glass, organic food and construction waste. Improper disposal of waste will lead to land contamination, proliferation of vectors of diseases, foul odor and other nuisance impacting local communities.
- 204. **Mitigation.** According to the Waste Prevention and Management Act 2009, any person polluting the environment or causing ecological harm shall be responsible for the costs of mitigation and restoration. Every business entity is required to provide appropriate bins for waste storage and safe collection, segregate hazardous wastes within the premises, maintain cleanliness of the respective premises or surroundings.

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⁵²As per Development Control Regulations 2016.

- 205. The contractor will ensure that workers are briefed on proper waste management and good housekeeping at worker camps is enforced. Separate bins for "biodegradable" and "non-biodegradable" for staff quarters and worker camps, and a separate bin for hazardous waste. Waste storage areas will be identified until these are collected by the municipal trucks. Hazardous waste will be stored separately and disposed with the guidance of Thromde. Demolition waste will be removed from the site daily and disposed at designated disposal sites.
- 206. If required by the Thromde, the demolition and construction waste will be transported along the designated route, and during specific times if specified in waste disposal permit without any spillage along the route (and the route will be cleaned if spillage occurs). Again, if required by Thromde, the waste dumped will be levelled and compacted, and the Thromde Officer will be updated on quantities disposed.

17. Community Health and Safety

- 207. **Impact.** The main risks to public health is if the construction workers (both foreign and nationals) are sick and transmit these by mingling with the public and local community. The public may also be at risk or if they walk into the site when work is ongoing or from materials falling from the building site.
- 208. **Mitigation**. Measures to minimize risks to community health and safety include cordoning the construction site to exclude public from the site, controlling access to the site, installing signboards to notify passers-by of ongoing work, installing warning signs near access road and entry points, restrict spilling or storing of construction material along access road, on top of drains and footpaths.

18. Congestion and Traffic Management

- 209. **Impact.** The risks to human safety is the risk of accidents during material transportation especially along Pelkhil Lam during peak traffic hours if drivers are not careful and if construction material is stored along the access road.
- 210. **Mitigation**. The material transporters will be briefed to adhere to speed limit to reduce the risk of accidents. To reduce congestion, the contractor will coordinate with material transporters to schedule materials drop times and avoid peak traffic hours (e.g., 8.30-9.30AM and 4-6PM).

19. Aesthetic Impacts

- 211. **Impact.** The housing project will be located within 0.85 acres of property allocated to NHDCL, specifically for housing. If not properly designed, the buildings can have negative aesthetic impacts.
- 212. **Mitigation**. The design team will consider requisite development controls (such as building height, ground coverage and minimum setbacks from roads and adjacent plots), as per the allowable local area plan. A major part of the land will be retained as parking with the building coverage at 28.8%. 11.5% of the area will be allocated as green space. The building designs will also utilize the Bhutanese Architecture Guidelines⁵³ as a reference to ensure that the buildings

⁵³ MOWHS, 2014. The Bhutanese Architecture Guidelines.

blend in with the surrounding while maintaining certain elements of traditional Bhutanese architectural designs.

20. Chance Finds

- 213. **Impact.** Given that the locations and areas, where earthmoving works will be required are known, chance finds may be remote as the existing buildings on the site have been there for many years now. Nevertheless, there is still a possibility that underground assets or archaeological artifacts may be discovered at the site, requiring precautionary measures and procedures to be followed.
- 214. **Mitigation**. Contractor(s) need to be made aware of a chance finds procedure. In case underground assets or archaeological artifacts are encountered during excavation, construction activities including within a 30-meter radius in the area will be stopped immediately by the Contractor and the discovery will be reported by the site engineer or representative of Contractor to PIU. In particular, the following chance finds procedure should be strictly observed:
 - (i) In case of suspected chance finds, the Contractor shall immediately stop all works;
 - (ii) Contractor to report immediately within the same day to the PMU or PIU regarding the suspected chance finds;
 - (iii) PMU or PIU to advise Contractor to strictly follow the full stoppage of works;
 - (iv) PMU to report the potential chance finds to the Department of Culture, Ministry of Home and Cultural Affairs, and the latter to investigate; and
 - (v) No works shall resume until clearance is provided by the Department of Culture, Ministry of Home and Cultural Affairs.

21. Natural Hazards and Accidents

- 215. **Impact.** The risk of earthquakes is high for all of Phuentsholing in general. Also, there is always the risk of structural fires requiring emergency mitigation measures. The site is not at risk of floods as it is not close to any river (>200m) and it is also at a much higher elevation and buffered from the Omchu/Dhoti khola (the nearest river) by settlement and roads.
- 216. **Mitigation.** Mitigation measures during earthquakes will require following the guidance of the Phuentsholing Thromde Disaster Management Committee (DMC) and ensuring the measures outlined under Occupational health and safety are followed. This includes provision of transportation to the hospital for injured workers, ensuring fire extinguishers or water storage tanks with hoses are readily available and posting emergency numbers (Fire, Police and Hospital) at a visible location. All workers should also have a common meeting point and be aware of procedures to follow.

22. Completion of construction work

- 217. **Impact.** The housing complex cannot be complete and ready for its tenants until the infrastructure works are inspected for completion; the site is cleared of construction debris and damages repaired. However, there is a risk that site could be abandoned and left with unmanaged wastes, debris and other temporary structures used during the construction phase.
- 218. **Mitigation**. Once the construction is over, the contractor will be responsible for ensuring decommissioning of all temporary worker camps. All temporary structures will be dismantled/demolished, temporary septic tanks (if not connected to the central sewer) will be

emptied out and covered with an adequate amount of soil. All construction materials and debris will be removed before handing the site to the PIU. Any damaged property (government or private) will be repaired and/compensated before final leaving the site. The site will then be replanted with appropriate species during landscaping and creation of green spaces.

219. For more specific actions on the decommissioning activities, the Contractor shall follow international best practices such as those in World Bank Environmental Health and Safety (EHS) Guidelines on Construction and Decommissioning Activities.⁵⁴

F. Anticipated Impacts and Mitigation Measures During Operation Phase

1. Impacts

- 220. At this stage, potential impacts are mostly beneficial as the new tenants will get to live in the newly constructed housing complex, which is affordable, suited to the climatic conditions and more resilient to disasters. The only concerns during the operation phase are the wear and tear on the building, breakdown of electrical and plumbing fixtures/systems, and risk of natural hazards and fire.
- 221. Over the long term, generation of liquid and solid wastes will also generate impacts to the environment if not managed well.

2. Mitigation Measures

- 222. **Maintenance and delivery of services**. The NHDCL has a Real Estate Management Services Division/Unit (REMSD) that is responsible for managing and carrying out maintenance work on its buildings. It also has a pool of trained and certified electricians, plumbers and masons in case repairs are urgently required. Other maintenance requirements are regular cleaning of the complex either by the residents or hired sweepers.
- 223. **Fire and Natural Hazards**. NHDCL must ensure that the focal resident person or caretaker is trained in using fire extinguishers and that these are regularly checked and maintained. The emergency numbers of Fire, Police must be posted near the fire extinguisher or at a visible location. NHDCL must also ensure for the conduct of periodic fire drills, posting of emergency exit plans, designating evacuation areas, dissemination of other emergency plan information, and all other activities that will raise awareness among residents on how to behave and respond in times of fire or natural disasters.
- 224. REMSD must immediately intimate the Thromde Disaster Management Committee and follow their instructions in case of a disaster.
- 225. **Water shortage.** The infrastructural design has incorporated rainwater harvesting, which will significantly reduce the demand for water during the operation phase and adequate water tanks will be installed onsite.
- 226. **Liquid and solid waste generation.** This is not a significant concern as the site is serviced by the municipal waste disposal service providers. NHDCL will promote waste segregation, storage and disposal as per Thromde collection requirements and procedures and

⁵⁴ IFC World Bank Group. 2007. <u>Environmental, Health, and Safety (EHS) Guidelines – General EHS Guidelines:</u> <u>Construction and Decommissioning.</u>

ensure that garbage is not allowed to accumulate on the premises. The new buildings will be connected to the centralized sewer network of the municipality.

G. **Cumulative Impacts and Mitigation**

- 227. Due to its strategic location as a border town between Bhutan and India, Phuentsholing has over the last few decades evolved from a small town to a bustling commercial center, encompassing a mini dry port and industrial estate. Apart from being the southwesternmost gateway to India, Phuentsoling provides a vital link to Samtse Dzongkhag, a mining center. As the gateway to Bhutan, Phuentsholing experiences daily traffic of 10,000 vehicles between Phuentsholing and Jaigaon and 47,000 vehicle passengers and pedestrians.⁵⁵ The traffic between Phuentsholing to Samtse has increased substantially due to the current border lockdown and with all vehicles to Samtse driving through Amochhu.
- Due to geographical limitations, the municipal area stretches over 15.6 km², with little room to expand due to the steep slopes and fragile geology. Within this limited Thromde area, there are 6,817 households with a population of 27,658.56 Almost half of these is not connected to the sewerage network.
- Ongoing development projects in the project area. In Amochhu, with the assistance of the ADB, Phuentsholing is aggressively pursuing the Amochhu Land Development and Township Project, covering 462 hectares of land. There is also an ADB-financed 4-lane Phuentsholing-Chamkuna Road Project from Phuentsholing to Samtse under the South Asia Sub regional Economic Cooperation Transport, Trade Facilitation and Logistics Project.
- 230. Within the core area the Thromde has completed the construction of a multi-level car parking (MLCP) to fit 200 vehicles. The Thromde has initiated the implementation of 3 new LAPs, in addition to its 8 existing ones - creating alternative routes, widening existing ones, parking spaces, expanding the sewerage network, sanitation and drinking water supply facilities.
- 231. In terms of private and government building constructions, the Thromde approved 60 new building constructions in 2019.⁵⁷ Apart from these, there is not much development (due to lack of available land) in the city center because it is already developed compared to other parts of the city, where the Thromde is focusing its resources.
- 232. The housing project will add to the ongoing infrastructure development and Local Area Plan that are already ongoing in the Thromde. The housing subproject will add to the cumulative air pollution and impact the ambient air quality. If there is no mitigation, the health of the resident and workers will be negatively impacted, with health and economic consequences. Also, it will require resources such as water, timber, construction material and extension of existing municipal services such as waste management.
- 233. The construction impacts will be visible and have social and environmental impacts during the construction period of 24 months. By this time, the other infrastructure development works of ADB will also be mostly completed. Most of the construction activities are limited to the project sites. It is unlikely that any of the project impacts will go beyond 200m around each site.

⁵⁷ MOWHS 2019.

⁵⁵ IEE 47284-002-iee-en

⁵⁶ GNH, 201

H. Environmental Benefits and Enhancement Measures

- 234. Despite the transient negative environmental and social impacts, the project will generate substantial environmental benefits and enhancements measures. After Thimphu, Phuentsholing is the most populous urban center, yet with the highest unemployment rates—6.3% for females and 3.1% for males in Phuentsholing. Most of the urban contract workers (cleaners, waste collectors, and semi-skilled workers) reside in informal settlements in Phuentsholing as they are unable to afford decent housing elsewhere.
- 235. Overall, the subproject will provide about 96 decent affordable accommodation for low-income Bhutanese people living in Jaigaon, the Indian town across the border from Phuentsholing, who were evacuated recently due to the COVID 19 pandemic, as well as low-income wage earners working in various government agencies.
- 236. The housing complex will include internal access with ample parking, pedestrian footpath, recreational area/green space. Rainwater harvesting and water storage tanks will be provided that will ensure that residents do not have to face water shortage constraints.
- 237. Given the city's vulnerability to natural hazards due to its location, terrain and climatic conditions, the overall project will promote the development of disaster and climate resilient infrastructure.
- 238. The overall project will enhance the capacity of NHDCL to design and build disaster resilient infrastructure, adapted to disasters and natural hazards such as earthquakes, windstorms and floods and to select construction materials, taking into consideration the potential increase in temperatures, rainfall and extreme weather conditions in the future. It will create awareness of both NHDCL and the private contractors/sector on safe construction practices.
- 239. The overall project will also enhance the capacity of local contractors through constant supervision and guidance on safe construction practices.

I. Summary of Impacts and Mitigation

240. This subproject involves the construction on four (G+5 floors) with 96 units will be constructed within 0.85 acres of land, with a total land coverage of 28.8%. The parking will fit 36 light vehicles and 36 2-wheelers.

1. Design and Pre-construction

- 241. Given that all the site is located within the core area and within a designated Local Area Plans, the project activities will have no impact on any protected area, critical habitats or endangered, rare or vulnerable species.
- 242. Approximately 55 trees will be removed prior to construction. For every tree that is cut, double the number of trees will be replanted within the housing complex during landscaping works, or for slope stabilization in Rinchending.
- 243. There are no Physical Cultural Resources that will be impacted by the project so no mitigation is required.
- 244. The receptors that lie within the zone of influence (within 200m of the proposed infrastructure development work) are the residential buildings, shops, offices, and businesses (including ongoing construction work). Measures to minimize impacts from air, dust, noise and

health and safety risks to the public and the resident communities have been incorporated during the construction phase.

- 245. The only disaster risk with the site is the High risk of earthquakes which has been taken into consideration during building design and through choice of construction material.
- 246. The project has no impacts on private land so there is no need for land acquisition. There are some structures that need to be removed and compensated according to the resettlement plan that has been prepared. Once this is done, demolition works can commence.
- 247. The site is easily accessible from Pelkhil Lam so there is no need to construct an approach road. Also, drinking water supply schemes and electricity is already available at the existing house, which will be utilized during construction.

2. Construction phase

- 248. In general, the implementation of construction work is not expected to cause major negative impacts spatially or temporarily because the site is within the designated urban areas and has been specifically allocated by the Thromde for construction of housing units.
- 249. Construction impacts will be limited to the immediate area and its surrounding and therefore the zone of impact (mostly for noise and air and dust pollution) is less than 200m. Both demolition and excavation work will be confined to the existing structure and building footprint and will not last more than two months.
- 250. Excavation works will be planned so that it can be carried out and all excess soil removed from the site before the onset of the monsoons.
- 251. The choice of prefabricated construction materials means less assemblage time, waste and disturbance to the neighboring community.
- 252. NHDCL will ensure that contractor (s) selected have adequate experience in such infrastructure works. The construction work will be contracted out as per prevailing government procedures wherein the contractor will be accountable for managing the construction sites responsibly and delivering quality structures within the stipulated period.
- 253. As part of their responsibility to prevent unwanted/unsafe development, the Thromde will monitor all building construction through regular site visits during various stages of the construction process (foundation, completion of each floor, and roofing). Upon completion of the project, the issuance of an occupancy certificate is based on compliance to the approved construction approval and site inspections. This check and balance system ensures that appropriate design and structural considerations are adhered to.
- 254. The construction team will comprise of small teams 30-40 workers in one building at any given time. Also, work will be staged so that, as one team completes a task, the next team can be brought to the site, (e.g., stoneworkers, masons, tilers, woodwork, painters, electrician, plumbers etc.).
- 255. Potential environmental and social impacts before, during and post construction have been identified along with appropriate mitigation measures that are included in the Environmental Management Plan which be included in the bid document

- 256. The PIU will conduct an orientation for both its staff as well as selected contractor(s) on ADB safeguard policies, national regulations and EMP requirements, and COVID 19 safeguard requirements and procedures
- 257. The construction will be monitored by the supervision staff and the PIU, and accordingly corrective actions will be undertaken and reported to the PMU and to ADB.

3. Post construction

- 258. The necessary areas of concern during the operation phase are natural hazards, building wear and tear, water shortage and waste management. Again, mitigation measures for these are incorporated in the EMP to be implemented by the NHDCL, who will ensure regular repair and maintenance of its newly constructed structure so that its residents can enjoy the benefits of the new housing colony.
- 259. All in all, the key areas of concern with this site is congestion due to the heavy traffic in the city core, the impacts due to dust, noise and waste generation during demolition and disturbance to the community during construction.
- 260. On the social front, the Grievance Redress Mechanism will be instituted and required processes followed to ensure that there are no outstanding grievances due to the project. Any public or private property that is damaged during construction will be promptly repaired and reported. Regular Environmental and Social Monitoring Reports will be submitted to the PMU and ADB on the status of the work and compliance to ADB safeguards, National Regulations and the EMP.

VI. ANALYSIS OF ALTERNATIVES

A. Alternatives relating to Site Location

- 261. There is an acute shortage of government land within Phuentsholing Thromde, and yet there is an urgent need to meet the immediate housing demand. This leaves very little room for alternatives. For the Phuentsholing area, initially four sites had been selected, but due to concerns of long-term exposure at Pasakha, only three sites have been chosen for implementation.
- 262. Since the project is geared for urban low-income staff and wage workers, the site location is idea as it reduces transportation cost as most of the government offices, schools and businesses are located within a radius of 1km from the site.

B. Alternatives relating to Design and Technology

263. The project has departed from the convention housing design by incorporating universal designs features, disaster resilience, fire safety and rainwater harvesting considerations. It is a vast improvement from previous residential housing buildings that NHDCL has designed and built before.

C. Environmental Implications of Alternatives

264. There are many positive implications of the selected alternative. Firstly, the building footprint utilizes only 29% of the 0.85 acres. 11.5% will be maintained as green space while the majority of the area will be retained as parking.

D. Implication of No-Project Alternative

265. Both the "no project" and "with project" options have been studied and a comparison of 'No Project' and 'with Project' options are presented in the Table below.

Table 25: Comparison of "With Project" and "No Project" Options

Description	No Project	With Project
Social impacts	Maintain status quo	The Project will assist the Royal Government of Bhutan (RGoB) establish housing infrastructures for 96 families including those living in the temporary Kidu colony in Amochhu
Physical impacts	None	The planned housing complex will be designed based on what is allowable within the local area plan. Four (G+5) buildings will be constructed on 0.85 acres of land.
Potential impacts due to seismic risks, environmentally friendly and climate resilience	There is an existing single storey structure which is over four decades old at the site.	Design of buildings are as per Bhutan Building Regulations 2018, Bhutan Building Code of Bhutan 2018, Bhutanese Architectural Guidelines, 2014 and the Bhutan Green Building Guidelines, 2013; Development Control Regulation 2016; Bhutan building color code- 2014; Design guidelines for differently abled friendly construction-2011. The project will integrate innovative approaches to enhance resilience to geophysical events with suitable materials. The design includes parking, rainwater harvesting and installation of storage tanks. 11.5% will be left as green space.
Environmental impacts Potential impacts to ecologically sensitive areas, critical habitats, biodiversity and physical cultural structures	No impact as the site is located within city boundaries	Same as 'no project' scenario
Social impacts Potential impacts to indigenous people	There are no indigenous communities at or near the project site	Same as 'no project' scenario
Disruption to local residents during construction	None	There will be some disturbance to local residents living in close proximity to the construction site during the construction period especially due to construction noise. There is a potential for traffic congestion to occur with increase in material transporting vehicles
Employment opportunities for locals	None	The project will provide employment opportunities for able, skilled and non- skilled workers (both foreign and local)

266. "No Project" option: The no project option means that the existing housing crunch, a chronic issue being faced at the Kidu Colony and by low-income government and corporate

employees in Phuentsholing will continue. Given the lack of land availability in Phuentsholing, the space utilization at the 0.85 acre site is very poor and only houses one family.

- 267. The lack of affordable housing further aggravates already existing urbanization woes such as increasing illegal settlements and temporary huts, overcrowding, waste generation, and inadequate sanitation resulting in unhealthy living conditions. The unaffordable housing also undermines a wage earner's ability to save money further widening the gap between the rich and the poor. This situation particularly impacts the low income and vulnerable population the most, as they continue to reside in housing complexes ill-suited to withstand the seismic risks and natural hazards.
- 268. "With Project" option: The new project will provide affordable housing and relief for 96 families. The new housing complex will be designed to suit the topography and surrounding land use. It will incorporate universal design features (ramps, sufficient parking, pedestrian footpaths and efficient drainage systems). It will be designed for disaster resilience and fitted with fire extinguishers. Environmentally friendly/green features such as use of locally produced materials, improved window designs, waste management units, provision of adequate water storage tanks, open green spaces and parking. Above all, it will provide opportunities for low income families to save money while live in a healthy, spacious environment, in close proximity to all amenities. The project will also generate employment opportunities for both skilled and non-skilled workers during the construction phase.

VII. INFORMATION, DISCLOSURE, CONSULTATION AND PARTICIPATION

A. Consultation and Participation

269. Consultation, participation, and disclosure constitute an integrated process in the project design preparation and implementation. As required by ADB SPS, NHDCL will disseminate information to affected persons and consult with them in a manner that is commensurate with the anticipated project impacts on the affected communities. NHDCL will inform and consult with the affected persons on resettlement and compensation options and provide them with project-related information during resettlement planning and implementation. Disclosing information will precede consultation.

B. Approach and Methodology

- 270. Key stakeholders were identified and consulted during the project planning process. Copies of minutes of consultation meetings are in Appendix 6. The key stakeholders consulted are as follows.
 - (i) Executive Secretary, Phuentsholing Thromde and Solid waste section head, Thromde office- 12 March 2021
 - (ii) Affected people Dasho Drungpa, restaurant owners 10-13 March 2021
 - (iii) Future potential residents- residents of the Kidu Colony including Tsogpas/representatives and women's groups; 10 March 2021
 - (iv) Waste collectors/technicians working with the Thromde- 12 March 2021
- 271. **Consultations during COVID-19 Pandemic.** Meaningful consultations will continue even as the COVID-19 pandemic prevails. Consultations will be undertaken through a combination of online, virtual and in-face consultations. Field consultations will be undertaken only when necessary, but following safety guidelines to ensure project team members and participants are

not put at high risk of contracting COVID-19. A set of guidelines has been developed for the project to ensure that the conduct of consultations will be a safe activity for the organizers and participants (see Appendix 7). This set of guidelines may be adopted wholly or adjusted depending on the prevailing local and national guidelines on COVID-19.

C. Preliminary and Follow up Consultations

1. Consultation and project disclosure with relevant stakeholders

- 272. NHDCL has informed and sought clarification from the Forest Range Office on the proposed activities to confirm that the IBAT species list.
- 273. Consultation were carried out with Executive Secretary, Phuentsholing Thromde to discuss the proposed sites and related social (affected persons, compensation requirements) and environmental concerns (water supply, waste and disaster risks) for each site.

Table 26: Public Consultations for the Phuentsholing Subproject

Date	Target audience	Number of Participants
March 9, 2021	NHDCL and Government staff (those currently living in NHDCL housing and those who are not but have applied)	16 (10M, 6F)
March 10, 2021	Employed and Unemployed (Kidu Colony)	18 (7M, 11F)
March 12, 2021	Waste workers	7
March 10, 2021	Women's group	9F +, 3M (organizers)

2. Summary of key queries and clarifications regarding the Phuentsholing subproject

- 274. The Objective of the consultation was to inform project affected people about the plan for development of the affordable housing in Phuentsholing through ADB support; to make participants aware of the safeguard requirements, to agree on a plan to vacate the identified sites ahead of the project approval and implementation phase; and discuss any forms of assistance that NHDCL could provide to ease the process of vacating and relocation of affected people.
- 275. During each meeting, the NHDCL Liaison Officer presented the floor plans and designs of the housing units planned in Phuentsholing as well as the location identified. He also informed that the lowest rent would be Nu. 4,400 for a two-bedroom apartment and Nu, 3,000 for a one-room apartment.
- 276. All apartments are handed over with inventories to new tenants which is the basis for verification when the apartment is vacated. Tenants are responsible for paying their bills directly to the service provider and rent can be deposited by electronic transfer or cheque or cash to NHDCL's account. Each NHDCL colony and buildings has a Representative for maintenance and to coordinate waste management. From experience in existing NHDCL housing facilities, the challenges faced by the Representative is the lack of incentive and the low compliance by the tenants to notices and requests to participate or collaborate in events such as cleaning campaigns. It is with trust that this issue will be remedied by the recent Zero Waste Hour Policy of the Government, which requires all offices/residential complexes to carry out cleaning on the

second day of every month. NHDCL will provide cleaning implements and accessories such as gloves and plastic bags to efficiently collect wastes. If found necessary, NHDCL will hire cleaners to clean the premises.

277. For maintenance purposes, all tenants are required to fill and submit a form to the NHDCL through their representative. Based on this a technician is deputed to assess and carry out routine maintenance. Minor repairs are also carried out by the tenants themselves

3. Meeting with the residents of the Kidu Colony/Resettlers

- 278. Much of the discussion with the members from the Kidu Colony, at Amochhu was on the differences between living in Bhutan and Jaigaon, India. The key advantages of living in Jaigaon are cheap rent, easy availability of goods. The disadvantages outweigh the advantages and include high electricity charges, common toilets, safety risks, easy access to drugs, difficulty in seeking timely and quality health treatment during emergencies. Moreover, tenants are at the mercy of landlords.
- 279. The residents are currently residing in the Kidu housing colony and apart from problems with cockroach infestations and unfiltered tap water, there are no major issues. They are anxious about whether they can find affordable housing once they are required to vacate the colony. They feel that the two-bedroom apartments proposed by NHDCL are suitable and affordable.
- 280. Regarding the location, some participants prefer living closer to core city area due to higher bus fares and easier access to educational, health facilities and proximity to Jaigaon.

4. Women's group meeting

281. Most of the women attending the meeting were working or doing home-based income generating activities like weaving and hawking edible snacks. Only one woman was unemployed as she had to stay at home to look after the children. In general, divorced or single mothers having to care for children struggled more than other married women. The women found the kidu colony safe with the only constraint being limited space for larger families. Apart from ration/food supplies from the Office of the GyalpoiZimpon they have not received any assistance from any other agency.

5. Focus Group Discussions with NHDCL and Government staff (those currently living in NHDCL housing and those who are not but have applied)

- 282. Most participants prefer the two-bedroom apartment and found the rent for this affordable. Currently, some residents are living in small, congested spaces in need of repair (which they carry out themselves) and face water shortage.
- 283. Some of the preferences for the new housing colonies are a) sliding windows reinforced with grills especially on the ground floor; grills in the open space along the stairway for security reasons; net screens on doors and windows. It was recommended that NHDCL fix the rent based on location and distance from the city center. The participants found the idea of ownership schemes for housing units very good in principle but realize it might be difficult practically due to frequent transfer of civil servants.

284. Other recommendations were to provide individual water meters; install good quality electrical and plumbing fixtures and fittings that are locally available so that tenants can easily purchase these if damaged.

D. Future Consultations during detailed design stage

285. Once the detailed design of the housing complex is finalized, NHDCL through PMU, will prepare a brief and disclose the same through the conduct of meaningful consultations with the stakeholders, including those identified during the reconnaissance visits but were not included in previous consultations. Follow up consultations will also be undertaken prior to construction activities, and will continue throughout the subproject implementation. Formal disclosure of completed project reports will also be made by making copies available at the NHDCL site and head office, informing the public of their availability, and providing a mechanism through which comments can be made.

E. Information Disclosure

- 286. NHDCL will disclose relevant information regarding the project on the website, and in print form, which will be available to interested parties at the PIU. The project contact details will also be posted on the signboard installed at the construction site, so that any person can call the PIU for project related information.
- 287. This IEE, which includes the EMP and all other safeguard documents, will also be disclosed on the ADB website for information. If any changes are made to the project design or location, this IEE will be updated, and likewise disclosed accordingly.

VIII. GRIEVANCE REDRESS MECHANISM

- 288. The project will adopt a three-tier Grievance Redress Mechanism (GRM) in implementing the project. The GRM will receive, evaluate, and facilitate the resolution of social, environmental or any other project related grievances. The GRM will aim to provide a time-bound and transparent mechanism to voice and resolve social and environmental concerns linked to the project. The GRM described below has been developed in consultation with stakeholders. Public awareness campaign will be conducted to ensure that awareness on the project and its grievance redress procedures is generated and shared with affected persons and other stakeholders. The campaign will ensure that the poor, vulnerable and others are made aware of the need for and process in availing the GRM.
- 289. The GRM provides an accessible, inclusive, gender-sensitive and culturally appropriate platform for receiving and facilitating resolution of affected persons' grievances related to the project. A sample grievance redress form is in Appendix 8. The three-tier GRM for the project is outlined below, each tier having time-bound schedules and with responsible persons identified to facilitate and address grievances at each stage, as required. Public awareness campaigns will ensure that awareness on grievance redress procedures is generated through the campaign. The Environmental and Social Safeguard Officer of PMU will have the overall responsibility for timely grievance redress on environmental and social safeguards issues.
- 290. **Who can file a complaint:** A complaint may be registered by stakeholders who may be, directly or indirectly affected by the project. A representative can register a complaint on behalf of the affected person or group, provided that the representative is identified by the affected person or group and submits evidence of the authority to act on their behalf.
- 291. What type of grievance/complaint: Any comments, complaints, queries and suggestions pertaining to safeguard compliance environment, involuntary resettlement, and indigenous people, design related issues, compensation, service delivery or any other issues or concerns related to the project can be registered. The complaint must indicate the name, date, address/contact details of the complainant, location of the problem area, along with the problem.
- 292. Where and how to file a complaint: The contractor's site office will be the primary point for receiving and lodging any complaint. Apart from that, grievances/suggestions/queries from affected persons can be dropped into suggestion boxes or conveyed through phone or e-mails. Affected persons or any complainant will also be able to register grievances on social, environmental or other related issues, personally to the Complaint Cell at PIU level.
- 293. **Process and Timeframe:** The grievance redress process and timeframe involved in the GRM is described below:
 - (i) **1st Level Grievance (Field Level)**: In case of grievances that are immediate and urgent in the perception of the complainant, concerned officer of PIU will direct the contractor to resolve the complaint and ensure that it is resolved. If the grievance is not under the contractor's scope, the Project Implementation Assistance Consultant (PIAC) will resolve this issue with the support of respective PIU. Efforts will be made to resolve all grievances within two days from the date of receipt of a complaint / grievance. Relevant government representatives from the respective districts and sub-districts, where the subproject will be implemented, can be consulted as and when required.

- (ii) 2nd Level Grievance (PIU): Grievances that cannot be redressed at first level within two days will be brought to the notice of the Complaint Cell at PIU level. The Project Engineer will try to resolve the grievance/ complaint within a timeframe of 14 days of receiving the complaint from the first level. The PIU may consult/seek the assistance of the Environment and Social Safeguard Officers at the PMU level. Government representatives from the respective districts and sub-districts where the subproject will be implemented can be consulted as and when required. Any unresolved complaint at the second level will be taken up to the third level.
- (iii) 3rd Level Grievance (PMU): All the grievances that are not addressed at 2nd level by PIU will be brought to the third level. The third level will meet once a month and determine the merit of each grievance/s brought to the committee. The third level grievance redress committee will resolve the grievance within 14 days of receiving the complaint from the second level. The Environmental Safeguards Officer or Social Safeguards Officer, PMU will provide feedback to the complainant. Any critical or unresolved matted may be taken to the Project Steering Committee (PSC) for solution.
- 294. MOF will chair the PSC which will comprise government officials from the Ministry of Works and Human Settlement (MOWHS), National Land Commission (NLC), the Gross Happiness Commission (GHNC), the National Commission for Women and Children (NCWC), the NHDCL, and representatives of selected subproject districts. The PSC will be established to oversee the project implementation and provide strategic and policy guidance and will meet at least biannually and as required.
- 295. The GRM notwithstanding, an aggrieved person shall have access to the country's legal system at any stage, such as Thromde or court of law in the respective district. This can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM.
- 296. The process of the project GRM is given in **Figure 31**.

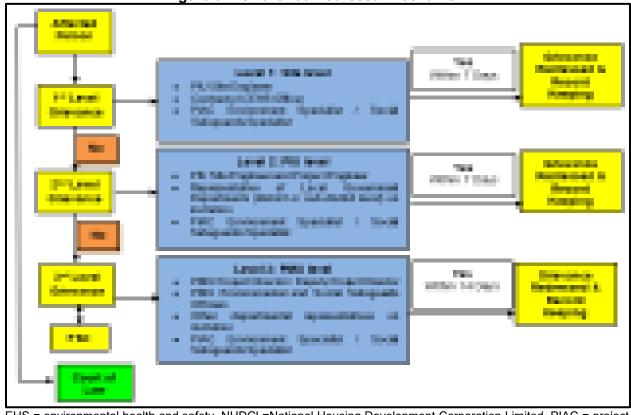


Figure 31: Grievance Redressal Mechanism

- EHS = environmental health and safety, NHDCL=National Housing Development Corporation Limited, PIAC = project implementation assistance consultant, PIU= project implementation unit, PMU = project management unit, PSC= project steering committee
- 297. The timeframes within which to resolve the issues may be adjusted accordingly during extraordinary circumstances, such as lockdowns or travel restrictions imposed by local or national governments due to the ongoing COVID-19 pandemic. The adjustment will depend on the period of interruption during these events and will be decided upon by the PMU.
- 298. Information Dissemination Methods about GRM. Periodic community meetings will be held by PIUs, and PIAC with affected communities to understand their concerns and help them through the process of grievance redress (including translation from local dialect/language, recording and registering grievances of non-literate affected persons and explaining the process of grievance redress) if required. The above Grievance Redress Process will be discussed with the different stakeholders during stakeholder consultation meetings. These meetings will be held with affected persons and community members (beneficiaries) and the concerned local government representatives where civil works are proposed. The process and timelines for grievance redress and contact details of the persons responsible for grievance redress will be shared in the stakeholder meetings. Action taken in respect of all complaints will be communicated to the complainant by letter, over phone or e-mail or text messaging.
- 299. **Consultation Arrangements for GRM.** This will include group meetings and discussions with affected persons, to be announced in advance and conducted at the time of day agreed on with affected persons and conducted to address general/common grievances; and if required with the Environment/Social Specialist of PMU/PIU for one-on-one consultations. Non-literate affected persons/vulnerable affected persons will be assisted to understand the grievance redress

process, at the site office of the contractor and at PIU level, the official appointed to receive grievances will assist the non-literate affected persons to register complaints and follow-up with actions at different stages in the process.

- Record Keeping. Records of all grievances received, including contact details of complainant, date of receiving complaint/grievance, nature of grievance, agreed actions and measures, the date these were affected, and outcome will be kept by PIU. The number of grievances recorded and resolved, and the outcomes will be displayed/disclosed in the PIU office, and on the website of PMU, as well as reported in the semiannual social and environmental monitoring reports to be submitted to ADB. The Environmental Officer and the Social Safeguard Officer will be responsible for maintaining the grievance record. Suggested template for recordkeeping of grievances is in Appendix 9.
- 301. Periodic Review and Documentation of Lessons Learned. The PMU. and PIUs. supported by the PIAC specialist will periodically review the functioning of the GRM and record information on the effectiveness of the mechanism, especially on the PIU's ability to prevent and address grievances.
- 302. Costs. All costs involved in resolving the complaints (meetings, consultations, communication, and reporting/information dissemination) will be borne by the PMU.
- ADB Accountability Mechanism. If the established GRM is not able to resolve the issue, 303. the affected person can use the ADB Accountability Mechanism through directly contacting (in writing) the Complaint Receiving Officer (CRO) at ADB headquarters. Before submitting a complaint to the Accountability Mechanism, it is recommended that affected people make effort in good faith effort to resolve their problems by working with the concerned ADB operations department (in this case, the Bhutan Resident Mission (BHRM)). Only after doing that, and if they are still dissatisfied, they could approach the Accountability Mechanism. The ADB Accountability Mechanism information will be included in the project-relevant information to be distributed to the affected communities, as part of the project GRM.

IX. **ENVIRONMENTAL MANAGEMENT PLAN**

Α. Institutional Arrangement

304. Overall Project Institutional Arrangement. The Ministry of Finance (MOF) is the executing agency and the National Housing Development Corporation Limited (NHDCL) is the implementing agency of all outputs of the proposed Bhutan Green and Resilient Affordable Housing Sector Project. MOF and NHDCL will engage relevant government agencies⁵⁸ and NGOs in designing and operationalizing the project. International and national consultants will be recruited to provide expert assistance. A central project steering committee (PSC) set up under the project will facilitate and ensure adequate coordination among relevant stakeholders and provide guidance for PMU and PIUs for this proposed project. In particular, the PSC will: (i) meet at least semi-annually or more frequently if required; (ii) provide guidance for and ensure the implementation of government and ADB policies for the proposed Project; (iii) assist in resolving any interagency implementation problems; (iv) review relevant reports and audit statements from

⁵⁸Department of Disaster Management (Ministry of Home and Cultural Affairs); Department of Engineering Services; Department of Geology and Mines; etc.

PMU and PIUs, as and when required; and (v) ensure that conditions of the Loan Agreement with ADB are met.

305. NHDCL being the implementing agency for the project, will be responsible for management, coordination and execution of all activities funded under the loan. A PMU at NHDCL will be created, which will be responsible for implementing the project. The PMU will be headed by a Project Director and supported by PIUs at the district and/or sub-district levels.

306. The PMU and PIUs will be further supported by a Project Implementation Assistance Consultant (PIAC) in project management and implementation. Figure below details the responsibilities for the project preparation, construction and operation.

Figure 32: Overall Project Implementation Arrangement

307. **Specific Institutional Arrangement for Environmental Safeguards**. Figure below depicts the implementation arrangement for environmental safeguards.



Figure 33: Implementation Arrangement for Environmental Safeguards

ADB = Asian Development Bank, EHS = environmental, health and safety, PIAC = project implementation assistance consultant, PIU = project implementation unit, PMU = project management unit.

- 308. **Project Management Unit.** The PMU will work closely with the PIUs in implementing the environmental safeguards requirements of the project. The PMU will be staffed with at least one (1) environmental safeguards officer who will lead the efficient overall implementation of environmental safeguards. With support from the PIUs and PIAC, the PMU will have the following responsibilities:
 - (i) Ensure subprojects comply with the national and local statutory and legal environmental requirements, ADB SPS 2009, EARF and environmental safeguards provisions of the ADB loan covenant;
 - (ii) Ensure subprojects conform to exclusion criteria and subproject selection guidelines as stipulated in the EARF;
 - (iii) Review and approve the environmental categorization of future subprojects;
 - (iv) Review and approve subproject IEE reports, including EMPs, and ensure that subproject IEEs and EMPs are updated based on final detailed designs and submit to ADB for clearance;
 - (v) Ensure that no civil works commence until updated IEE based on final detailed design is cleared by ADB;
 - (vi) Ensure that the IEEs including EMPs are updated in case of changes in detailed design that may occur during implementation phase;
 - (vii) Ensure that IEEs with EMPs are included in bidding documents and civil works contracts;
 - (viii) Ensure that the requirement for contractors to prepare their respective Health and Safety (H&S) Plans including COVID-19 H&S Plans is included in bidding documents and civil works contracts;
 - (ix) Review and approve site-specific EMPs (SEMPs) of contractors;

- (x) Provide oversight on environmental management aspects of the project, and ensure EMPs and SEMPs are implemented by contractors;
- (xi) Establish a system to monitor environmental safeguards of the project including monitoring the indicators set out in the monitoring plan of the IEE;
- (xii) Facilitate timely and ensure overall compliance with all national and local government rules and regulations regarding site and environmental permits/clearances/approvals as well as any other environmental requirements as relevant:
- (xiii) Review, monitor and evaluate effectiveness with which the EMPS, SEMPs, and Health and Safety Plans are implemented, and recommend necessary corrective actions to be taken;
- (xiv) With support from PAIC, consolidate quarterly monitoring reports from the PIU and submit semi-annual environmental monitoring reports (SEMRs) to ADB;
- (xv) Ensure availability of budget for safeguards activities;
- (xvi) Ensure adequate awareness campaigns, information disclosure among affected communities and timely disclosure of final IEEs/EMPs and SEMRs, including corrective action plans, if any, in project website and in a form accessible to the public;
- (xvii) Address any grievances brought through the grievance redress mechanism (GRM) described in this IEE report in a timely manner;
- (xviii) Undertake regular review of safeguards-related loan covenants, and the compliance during project implementation; and
- (xix) Organize periodic capacity building and training programs on safeguards for stakeholders, PMU, PIUs and contractors.
- 309. **Project Implementation Unit (PIU)**. The PIU will be responsible for the day-to-day activities of project implementation in the field and will have direct supervision to the contractors at subproject sites. The PIU will be headed by a Project Engineer who will oversee the overall implementation of the project including safeguards. The PIU will also appoint a Site Engineer who will oversee and monitor the day-to-day progress and implementation of the environmental provisions in the EMP. With support from PIAC, the Site Engineer will:
 - (i) Ensure compliance with government and ADB requirements on environmental safeguards;
 - (ii) Conduct regular site visits, including spot checks, to ensure the EMPs and/or SEMPs are properly implemented;
 - (iii) Review monthly reports from contractors;
 - (iv) Prepare quarterly reports on all aspects concerning environmental assessment, management, and monitoring;
 - (v) Obtain approval of the quarterly reports from the Project Engineer, and submit approved reports to PMU;
 - (vi) Address any grievances brought about through the GRM described in the EARF in a timely manner; and
 - (vii) Support all other environmental safeguards-related activities and tasks of the PMU as may be needed.
- 310. **Environment Specialist Consultant**. The PIAC shall have an Environment Specialist Consultant who will assist and train PMU and PIUs in implementing the EMPs of subprojects, including the review and updating of all necessary environmental safeguard documentation as required by ADB SPS and national laws, regulations, policies and guidelines applicable to each subproject. The Environment Specialist Consultant will also train PMU and PIU on how to monitor

safeguards compliance during O&M phase. Other specific tasks of the consultant are to assist PMU and PIUs to:

- (i) Conduct consultations/discussions with environmental regulatory agencies and other stakeholders:
- (ii) Identify all applicable and relevant national laws, regulations, policies and guidelines and preparing environmental assessment;
- (iii) Undertake environmental categorization for the proposed future subprojects;
- (iv) Carry out IEE for the proposed future subprojects and formulating environmental management plans (EMPs) for the different components of the civil works in line with ADB and national requirements;
- (v) Undertake assessment of existing safeguards system under the project, identifying areas for improvement, and development of appropriate safeguards implementation arrangement. This assessment will form part of the IEE, and results will be included in the IEE report;
- (vi) Carry out (a) environmental baseline data collection, (b) assessment of project hazards and risks that may be posed to the environment and people, (c) EMP development or formulation, (d) meaningful consultations with project-affected people; and (e) other preparatory activities necessary for finalizing the subprojects' environment safeguard documents;
- (vii) Prepare IEE report, environmental management plans (EMPs) as required by country's environmental legal frameworks and ADB SPS;
- (viii) Ensure that the relevant provisions of EMPs, including costs of implementing the EMPs, are fully included in bid and contract documents, particularly in the bill of quantities (BOQ) and cost line items;
- (ix) Review designs, bidding documents, BOQ, and safeguard documents to ensure health and safety considerations including issues related to COVID 19 pandemic, are adequately covered and costed;
- (x) Calculate and provide the indicative cost estimate to implement EMPs, environmental monitoring programs, awareness programs, etc.;
- (xi) Assist with any capacity building activities for stakeholders:
- (xii) Ensure quality and format of IEE reports, and other environmental safeguard documents following ADB Handbook of Styles and Usage;
- (xiii) Comply with disclosure requirements per ADB SPS;
- (xiv) Implement proposed environmental mitigation measures and ensure the implementation of EMPs during construction phase;
- (xv) Monitor implementation of SEMPs;
- (xvi) Monitor required environmental parameters and preparing semi-annual environmental monitoring report (SEMR) per the requirement of ADB; and
- (xvii) Prepare all necessary environmental reports per requirement during implementation of the civil works contracts.
- 311. Civil Works Contract and Contractor. The IEE with EMP will form part of bidding and contract documents and verified by PMU. The Contractor will be required to designate an environment, health and safety officer (or equivalent) to ensure implementation of EMP during civil works. Contractor is to carry out all environmental mitigation and monitoring measures outlined in their contract. The Contractor will be required to submit to PMU, for review and approval, a SEMP including (i) proposed sites/locations for construction work camps, storage areas, hauling roads, lay down areas, disposal areas for solid and hazardous wastes; (ii) specific mitigation measures following the approved EMP; (iii) monitoring program per EMP; and (iv)

budget for SEMP and EMP implementation. No works can commence until SEMP is approved by PMU.

- 312. Specifically, the Contractor will have the following responsibilities, among others that will be included in the bid and contract documents:
 - (i) Ensure that the infrastructure development works are carried out in an environmentally friendly manner, minimizing environmental impacts while ensuring the health and safety of all its workers and the minimizing disturbance to the surrounding environment and communities;
 - (ii) Consideration of ADB SPS, national regulations and the EMP during bid preparation and cost estimation;
 - (iii) Hire or designate a full time Environment, Health and Safety Officer (or equivalent) responsible for compliance to ADB SPS requirements, national regulations and the EMP. The officer/staff must have a clear terms of reference and responsibilities to ensure that all environmental and social concerns are properly managed;
 - (iv) Ensure regular reporting to the PIU on work progress and alert management on any potential issues or delays;
 - (v) Strictly follow National COVID 19 protocols and instructions issued by the Ministry of Health and the COVID Task Force, and immediately report to the PIU upon detection of COVID positive cases at the project site;
 - (vi) Obtain the necessary permits and clearances as required to implement the project;
 - (vii) Ensure that all worker recruitment and OHS requirements are complied;
 - (viii) Take necessary corrective action to rectify any non-conformance, including actions related to grievances;
 - (ix) Institute an emergency plan for natural calamities/disasters and accidents at the site; and
 - (x) Follow chance finds procedures to discovery of any physical cultural artifact.
- 313. A copy of the EMP/approved SEMP will be kept on-site during the construction period at all times. Non-compliance with, or any deviation from, the conditions set out in the EMP/SEMP constitutes a failure in compliance and will require corrective actions.
- 314. PMU will ensure that bidding and contract documents include specific provisions requiring contractors to comply with: (i) all applicable labor laws and core labor standards on (a) prohibition of child labor as defined in national legislation for construction and maintenance activities; (b) equal pay for equal work of equal value regardless of gender, ethnicity, or caste; and (c) elimination of forced labor; and with (ii) the requirement to disseminate information on sexually transmitted diseases, including HIV/AIDS, to employees and local communities surrounding the proposed project infrastructure sites.

Table 27: Environmental Safeguards Roles and Responsibilities

	Environment Specialist	
Project Management Unit	Consultant	ADB
Pre-construction stage		
Environmental officer of the PMU, with	Environment Specialist Consultant	ADB to review the
assistance from the environment specialist	will assist PMU and conduct IEE	REA checklists and
consultant, to conduct Rapid Environmental	(or update existing IEE) for all	reconfirm the
Assessment (REA) for each site of	subprojects, which will include an	categorization.
proposed subprojects using checklist	EMP. The environmental expert	
available from ADB. Based on the REA,	and other consultants will work	

Project Management Unit	Environment Specialist Consultant	ADB
categorize the project based on ADB SPS. Submit all categorization forms to ADB.	with the design team to ensure all relevant environmental considerations are included in the design. The PMU consultants (environment and social) will assist PMU in the conduct of public consultations during IEE process and incorporate consultation findings into project designs and IEE.	
Based on its review, PMU will approve the IEE and send to ADB for review and clearance before contract award. The IEE also made available on request. Ensure IEE with the corresponding EMP is part of contract documents for category B subprojects. If the proposed infrastructure is classified as category C, the PMU to provide generic mitigation measures, if any, to be implemented. For Category C, no IEE/EIA is required, and only a review of the environmental implications is necessary.	After the approval of IEE by PMU and clearance by ADB, the Environment Specialist Consultant will assist PMU in disseminating the IEE to public for information as required by ADB SPS.	ADB will review and provide clearance of IEE/EMPs before award of contracts. ADB will disclose cleared and government-endorsed IEEs on its website.
Environmental officer of PMU to provide guidance to the PMU consultant team to ensure compliance of all undertakings with regulatory requirements with regard to environment. This shall include guidance in preparation of the documents as required for the issuance of environmental clearance and other necessary clearances such as for example forest clearances if required, submission of application forms, and liaising with agencies towards obtaining these clearances from relevant government agencies. Environmental officer of PMU shall notify the ADB on obtaining of these clearances, including the conditions specified if any in the clearances, and integration of these into the contracts/EMP.	The Environment Specialist Consultant shall support the PMU environmental safeguards officer in compiling the necessary information required for submission of application forms for clearances, obtaining NOC from local authorities, etc., including coordinating with the NEC/MOWHS on a regular basis and provide necessary documentation and clarifications as required until the environmental clearance is issued.	ADB to ensure that the clearance requirements are included in the contract provisions/EMP.
Environmental officer of PMU to ensure that the IEE containing the EMP of each subproject is included in the bid and contract documents. At the same time, the Environmental officer of PMU to ensure that the total budget for implementing the EMP is included in the bid and contract documents.	The Environment Specialist Consultant will support the PMU environmental safeguards officer in ensuring that each Contractor: (i) prepares its SEMP based on the EMP in the IEE, and (ii) has budget allocated for the implementation of the SEMP.	
PMU to review the monthly monitoring reports from the environment specialist consultant to ensure that all mitigation measures are implemented. PMU to consolidate the monthly reports and submit semi-annual reports to ADB for review.	Contractor to conduct environmental monitoring and implement SEMPs/EMPs. The Environment Specialist Consultant will assist the PMU environmental officer in (i) review and approval of	ADB to review the reports and provide necessary advice/guidance needed to the PMU.

	Environment Specialist				
Project Management Unit	Consultant	ADB			
Corrective actions to be undertaken if needed.	contractor's implementation plans such as EMPs/SEMPs, and (ii) monitor the implementation of mitigation measures in the EMPs/SEMPs by contractors. The Environment Specialist Consultant will also prepare monthly progress reports including a section on implementation of the mitigation measures and submit to PMU for review.				
Operation Stage					
PMU to conduct monitoring, as specified in the environmental monitoring plan of EMP. NHDCL to monitor the performance, if required and as specified in monitoring plan of EMP.					
PMU to continue submission of semi-annual environmental monitoring report to ADB until ADB issues a Project Completion Report. monitoring report and disclose on its website.					
		ADB to prepare Project Completion Report			

ADB = Asian Development Bank, EIA = environmental impact assessment, EMP = environmental management plan, IEE = initial environmental examination, NHDCL = National Housing Development Corporation Limited, NOC = no objection certificate, PMU = project management unit, REA = rapid environmental assessment, SEMP = site-specific environmental management plan, SPS = safeguards policy statement.

B. Environmental Management Plan Matrices

- 315. The table below summarizes the potential impacts and mitigation and management measures to be taken during pre-construction, construction and operation phases to avoid, reduce, mitigate, or compensate for adverse environmental impacts.
- 316. It is a commitment by NHDCL to implement the proposed management measure and therefore must be incorporated into the bidding documents, project construction contracts and also monitored during operation and maintenance

Table 28: Environmental Management Plan

Subproject	Potential Environmental	Table 28: Environmental Management Plan		Implementatio	Supervisio
Activities / Field	Impacts	Mitigation Measures	Cost	n	n
Design / Pre- cons	struction phase		-		
Subproject Ir Location a e	Impact on protected area, and other environmentally sensitive areas.	The subproject site is located within the city limit, at a distance of more than 80km from the nearest protected area (Phibsoo wildlife sanctuary). No mitigation measure is required with regard to impact on protected area or other environmentally sensitive areas. The designated land use is for housing and there is already one residential house at the site	NA	PIU	PMU
	Impact on Physical cultural Resources (PCR)	No mitigation required as the project site is not located at a distance that could impact a PCR. The nearest PCR is the Zangtopelri at the center of the town, which is more than 200m away.			
	Risk of natural hazards such as earthquakes and climate change considerations	 Design of buildings in line with Bhutan Building Regulations 2018, Bhutan Building Code of Bhutan 2018, Bhutanese Architectural Guidelines, 2014 and the Bhutan Green Building Guidelines, 2013. Choice of construction materials must be based on climatic conditions and suitable for monsoon rains and winter snow conditions. 	Included in Subproject design cost	PIU	PMU
Consents, permits and clearances	Failure to comply with national regulation and procedures can delay project progress	 Seek approval for building design and construction approval from the Development Control Division of the Phuentsholing Thromde. Consult with the Thromde to confirm the level of the highway as planned in the LAP, to keep the ground level of the site in line with the designed level of the new township. 	PMU Operating cost	PIU	PMU

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
		 Seek approval for environmental clearance from NEC. 			
Removal of trees	55 trees need to be cut	 Seek approval removal of trees from the Environment Division, Phuentsholing Thromde. Replant the area with at least double the number of trees cut during landscaping as compensatory measure. But as space is limited for tree planting, compensatory plantation will be carried out at other housing sites such as Rinchending. 	PMU Operating cost (permit) Contractor's cost (removal and replanting)	PIU (permit) Contractor (tree removal and replanting)	PMU
Aesthetics	Change in aesthetics at the site due to new infrastructures that could obstruct views.	 Consider requisite development controls (such as building height, ground coverage and minimum setbacks from roads and adjacent plots), as per the allowable local area plan. Comply with the Bhutanese Architecture Guidelines⁵⁹ as a reference to ensure that the buildings blend in with the surrounding while maintaining certain elements of traditional Bhutanese architectural designs. Undertake landscaping and revegetation will further improve site conditions once activities are completed. 	PMU Operating cost	PIU	PMU
Compliance with ADB Loan Agreement and SPS	Lack of technical capacity on environmental safeguards	Conduct briefing/orientation for designated staff to be aware of ADB safeguard policies and RGOB regulations relevant for the project, including EMP, and compliance monitoring and reporting requirements.	PMU Operating cost	PIU / PMU	PMU
	Lack of awareness by the Contractor on ADB environmental safeguard policies and EMP requirements and	 Incorporate the cost of OHS and the EMP as well as any specific provisions into the bidding documents requiring contractors to comply with all other conditions required by ADB into the bidding and contract documents 	PMU Operating cost	PIU / PMU	PMU

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⁵⁹ MOWHS, 2014. The Bhutanese Architecture Guidelines.

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
	therefore mitigation measures not budgeted	 Conduct pre-bid meeting to inform contractors of the need to strictly incorporate OHS and EMP into the contract cost Once contract is selected, conduct awareness for contractors on their responsibilities in EMP implementation, compliance with ADB and RGOB requirements, self -monitoring and reporting procedures. 			
Project disclosure and Community awareness	Lack of awareness by the Public and Community on project activities or GRM	 Disclose project information/brief on NHDCL website, along with GRM mechanism and contact numbers, and one available at the site office Design and install project signboards as per design standards and specifications of the District and include relevant contact numbers for GRM 	PMU Operating cost	PIU / PMU	PMU
Construction phas	e				
Award of Construction work	Positive multiplier effect for goods and services	 The project will generate employment and business opportunities for local suppliers of construction materials as well as material transporters and machine operators. 	PMU Operating cost	PIU / PMU	PMU
Site preparation and Construction of site office, worker camps and material storage sheds	Encroachment on government or private land due to lack of space for accommodating worker camps and storage	 If required, land will be leased from government or private landowners to set up worker camps, material storage and to park machinery. Set aside a secure enclosure/shed for the storage of cement, lubricants, solvents, paint, electrical and other breakable material. Fuel and other petroleum products must be stored at storage areas away from water drainage and protected by impermeable lining and bunded 110%. 	Contractor's cost	Contractor	PIU
Recruitment and management of workers	Non-compliance with National recruitment regulations and risk of	Strictly follow the "Handbook on Recruitment and Employment of Foreign	Contractor's cost	Contractor	PIU

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
	employing underage children.	 Workers in Bhutan"⁶⁰ with respect to screening recruitment, worker permits, road passes, management, and repatriation Process for worker permits and entry as per prevailing health restrictions and screening requirements. Follow restriction on employment of children below 18 years. Employ trained and skilled national workers wherever possible. If Contractor has more than 12 workers, it must submit a Notification of Construction Work (in writing and as per the information required) within 7 days after the commencement of the work, to the Chief Labour Administrator, and also repeat the same within 7 days of completion of the work. 			
	Risk of conflict and disturbance with neighboring community	 Brief all workers on required social behavior and impose sanctions for inappropriate conduct. Record number of complaints received from neighboring residents 	Contractor's cost	Contractor	PIU
	Requirement for housing and resources (drinking water and electricity and sanitation facilities	 Provide workers with temporary accommodation, drinking water and sanitation facilities, with separate toilets for males and females. Maintain cleanliness of the residential areas. Ensure adequate water is available for sanitation and require workers to maintain toilets. Follow the standards for workers accommodation per guidance note by the 	Contractor's cost	Contractor	PIU

 $^{^{60}\}mbox{RGOB}.$ Regulations on Working Conditions, 2012

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
		International Finance Corporation and European Bank for Reconstruction and Development entitled "Workers' accommodation: processes and standards: A guidance note by IFC and the EBRD".			
Occupational health and safety	Health and safety risks for construction workers	 Prepare site-specific health and safety management plan including COVID 19 H&S measures. Nominate a Health and Safety Officer with specific responsibilities to ensure the OHS of all workers, report on accidents and to follow national health protocols. Abide by the international best practices on occupational health and safety such as those in Section 4.2 of World Bank EHS Guidelines on Construction and Decommissioning Activities;⁶¹ Screen workers at their point of origin for both virulent and contagious diseases, including COVID-19. Follow COVID 19 protocols as per the prevailing requirements of the Ministry of Health and the COVID Taskforce. Identification of workplace and process hazards (with machines, vehicles, excavation, and construction activities including electrical work) and outline procedures and responsibilities for preventing, eliminating, and minimizing the effects of identified work hazards and risk. Install adequate support structures for temporary structures. Prepare emergency management procedures. 	Contractor's cost	Contractor	PIU

⁶¹ IFC World Bank Group. 2007. Environmental, Health, and Safety (EHS) Guidelines - General EHS Guidelines: Construction and Decommissioning.

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
Activities / Field	Impacts	 Mitigation Measures Determine types of trainings/ orientations/ briefings required for each group of workers and who will give the required briefings. Institute protocols to deal with accidents and emergencies including compensation for treatment and recovery, loss of ability to work, and loss of life Provide medical assistance for cases of workplace related injury. Provide adequate payment and facilities (lighting) for overtime work. Post/Display emergency contact numbers of the staff as well as Police/Hospital/Fire at a visible location. Provide workers with Personal Protective Equipment (PPE) such as safety helmets, gloves, glasses, and boots (as required) and enforce their use at the workplace. Brief workers on work risks during toolbox talks. Restrict drinking or consumption of intoxicants at the work site. Post warning signs at risky/hazardous areas in the Dzongkha and English languages. Maintain accident register with incidents and actions taken. Maintain First aid box at site for minor injuries. Install fire extinguishers, with instruction and training of staff on how to use these. If fire extinguishers are not available, ensure alternative means of firefighting are available (adequate water, sand buckets, hose and pipes) 	Cost	n	n

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
		 Provide a safe means of access and egress to and from every workplace If gas cylinders are used, then store these in an upright position, protected against heat and cover the control valves with protective caps screwed to proper positions. 			
Demolition and excavation work	Mismanaged spoils and debris from loose excavated soils and demolished structures.	 Reuse excavated soil for filling in the building foundations and for levelling the parking and recreational areas Remove excess excavated soil within 2 weeks of excavation and dispose at designated site. Seek approval/permit for disposal of demolition debris and soil/spoil from District Regulatory Officer/Municipal, and remove unwanted soil / debris from the site within 2 weeks of demolition / excavation and dispose at pre-approved disposal site. (At least 50% of the soil will be reused for building foundation, road works or levelling works) 	Contractor's cost	Contractor	PIU
	Dust generation on windy days	 Enclose excavated areas to contain dust. Spray water over loose soil piles and debris especially on windy days. 	Contractor's cost	Contractor	PIU
Raw materials sourcing and storage	Haphazard and inefficient material purchase and sourcing	 Prepare and plan material requirement and delivery as required during each phase of construction depending on what is available locally Outsource manufacture of doors and windows 	Contractor's cost	Contractor	PIU
	Lack of storage space and Loss of materials	 Schedule material procurement to prevent both shortage and storage issues. Construct material storage shed, maintain inventory, and keep valuable items locked. Appoint security guard if necessary 	Contractor's cost	Contractor	PIU

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
		 Stacked material in a safe and orderly manner 			
Water Requirements	Water supply shortage due to additional demand for drinking, cooking, washing as well as construction and its associated activities (sprinkling/spraying and cleaning).	 Ensure adequate water for domestic (drinking, cooking, washing and sanitation) and construction purpose. Install adequate water tanks or mobilize water tankers during periods of shortage. To conserve water, all water supply pipes will be checked, repaired and maintained regularly to prevent leakages or blockages. 	Contractor's cost	Contractor	PIU
Electrical requirements	Delay in project implementation at the site due to lack of electrical power supply.	 Request from Bhutan Power Corporation for service on the handling of electricity connection before, during and after the construction works. 	Contractor's cost	Contractor	PIU
Sewerage requirement	Without any adequate sewerage system at the site, discharge of greywater and blackwater from the site and workers' camp could pollute the receiving bodies of water in the area.	 The workers' camp temporary toilets will be connected to septic tank which will be used until the end of the construction period, after which the septic tank will be decommissioned and cleared out Coordinate with Thromde for desludging / vacuum cleaning of tanks annually, if required Repair and maintain sanitation facilities. 	Contractor's cost	Contractor	PIU
Mobilization and operation of construction equipment	Risk of accidents and injuries to workers	 Train machine operators Ensure machine operators to use the horn when backing, be assigned a signal person to guide him when reversing Workers must be restricted from working in close proximity of equipment in operation, unless it is essential for assisting the use of the machine or for the intended work. In such cases, a supervisor should alert the worker of potential risks. 	Contractor's cost	Contractor	PIU
Erosion and sedimentation	Siltation of receiving body of water and canals in the area, resulting to clogging of these canals.	Complete all excavation works before the onset of the monsoon season to reduce the runoff.	Contractor's cost	Contractor	PIU

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
		 Construct drains to divert clean stormwater away from areas where soil is exposed by constructing drains with silt traps that is connected to this main stormwater drain. 			
Ambient Air Quality	The use of fuelwood for heating in winter will result in air pollution from fires. Exhaust emission from operation of machinery and vehicles will contribute to the air pollutant load (primarily particulate matter (PM), NOx, SOx, CO etc.) in the ambient air Dust from excavation, demolition and other construction activities.	 Provide alternative fuel (electricity or LPG) at workers' camp and restrict use of firewood for cooking (but may be allowed for heating as this is permitted in the city). Restrict open burning of wastes. Ensure that construction equipment and vehicles are maintained in good condition and have passed the RSTA emission test. Provide tarpaulin covers to vehicles transporting soil, sand and other construction materials and waste. Provide cover to stockpiles of soil, sand and other construction materials, especially during windy days. Spray water over bare or newly excavated areas especially on windy days and wherever possible excavated soil will be reused for leveling the site and for green belt development. Remove excess excavated soil from the site within 2 weeks of excavation and dispose at the designated disposal site. Spray demolition debris with water to keep it moist Seek approval/permit for disposal of demolition waste from Thromde and remove demolition debris as soon as possible 	Contractor's cost	Contractor	PIU
Noise and disturbance to the neighboring community	Construction activities will result to high level of noise that could impact the workers and	 Restrict construction work between 9PM - 8AM. Brief workers on their obligations regarding proper management of work and behavior 	Contractor's cost	Contractor	PIU

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
	communities around the site.	 with sanctions for inappropriate behavior or repeated complaints from the residents. Implement a preventive maintenance schedule for all heavy construction equipment and machinery to minimize noise and vibration. Do not allow woodworks such as the use of sawing machines at the site. Doors and windows must be fabricated offsite or outsourced. 			
Solid waste generation and management	Improper disposal of solid wastes could lead to contamination of lands, proliferation of vectors of diseases, foul odor and other nuisance to nearby communities.	 Provide appropriate bins for waste storage and safe collection, segregate hazardous wastes within the site. Maintain cleanliness of the site premises or surroundings. Ensure that workers are briefed on proper waste management and good housekeeping at worker camps. Allocate waste storage areas where wastes can be stored and then collected by the municipal trucks. Ensure to remove solid wastes and bring to designated disposal sites. 	Contractor's cost	Contractor	PIU
Community health and safety	Safety risk to public safety during transport of materials. Safety risk to pedestrians.	 Provide cordon or barricades around the construction site to restrict public from the site and controlling access to the site. Install signboards to notify passers-by of ongoing work, install warning signs near access road and entry points. Restrict unloading or storing of construction material along access road, on top of drains and footpaths. Designate personnel to warn passers-by and guide trucks during material delivery. Schedule materials delivery times to avoid peak traffic hours. 	Contractor's cost	Contractor	PIU

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
		Impose speed limits for trucks near the construction site.			
	Air pollution due to emissions and dust	 Provide alternative fuel (electricity or LPG) at workers' camp and restrict use of firewood for cooking (but may be allowed for heating as this is permitted in the city). Restrict open burning of wastes. Ensure that construction equipment and vehicles are maintained in good condition and have passed the RSTA emission test. Provide tarpaulin covers to vehicles transporting soil, sand and other construction materials and waste. Provide cover to stockpiles of soil, sand and other construction materials, especially during windy days. Spray water over bare or newly excavated areas especially on windy days and wherever possible excavated soil will be reused for leveling the site and for green belt development. Remove excess excavated soil from the site within 2 weeks of excavation and dispose at the designated disposal site. 	Contractor's cost	Contractor	PIU
	Congestion and blockages/obstructions	 Restrict material drop off by trucks during peak traffic hours (8-9.30Am and 4-6PM) Brief drivers on restriction of spillage or storing of construction material along access road, on top of drains and footpaths blocking access. 	Contractor's cost	Contractor	PIU
Chance finds	Potential chance finds	Follow chance finds procedure: In case of suspected chance finds, the Contractor shall immediately stop all works Contractor to report immediately within the same day to the PMU or PIU regarding the suspected chance finds.	Contractor's cost	Contractor	PIU

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
		 PMU or PIU to advise Contractor to strictly follow the full stoppage of works. PMU to report the potential chance finds to the Department of Culture, Ministry of Home and Cultural Affairs, and the latter to investigate. No works shall resume until clearance is provided by the Department of Culture, Ministry of Home and Cultural Affairs. 			
Emergencies such as earthquakes, Fire hazards	Risk of injury and losing lives due to natural hazards and fire	 Develop an emergency action plan to handle emergencies such as earthquakes, fires, breakdown in machinery, collapse of structures, electrical mishaps. These are as follow: Identify procedures to follow during emergencies. Display and maintain suitable warning signs at conspicuous places in Dzongkha and English. Identify a meeting point for all workers in case of earthquakes. Brief workers on protocols to follow during earthquakes. Provide transportation to the nearest hospital in case of accidents and emergencies. Install fire extinguishers or ensure adequate storage of water supply, water hoses and pipes Train staff to operate the fire extinguishing equipment. Conduct quarterly checks on fire extinguishers. Collapse of structures. Stabilize all temporary structures to prevent them from collapse. 	Contractor's cost	Contractor	PIU

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
Post construction – camp closure	Positive impact resulting to restoration of pleasant aesthetics at site.	 Electrical mishaps. Hire only certified electricians. Provide all temporary electrical installations with earth- leakage circuit breakers. Require workers to check safety of electrical wiring before commencement of work Operation of machines Restrict operation of machines to trained and competent operators, or under the supervision of one Implement camp and site closure plan that includes the following Dismantle all worker camps, fill in sanitation areas/temporary toilets with soil Remove all machines, equipment and debris from construction site and worker camps Restore any damage to government or private properties Hand over site back to PMU Carry out repair and maintenance during liability period as per contract Ensure that foreign workers exit the country (expatriation) on completion of work Plan and undertake revegetation and 	Contractor's cost	Contractor	PIU
Post- construction – greening and landscaping	Positive impact resulting to enhancement of surrounding environment.	 Iandscape development Improve aesthetic view by landscaping Development of green belt around the housing complex 	Contractor's cost	Contractor	PIU
Operation phase Building occupancy and utilization	Wear and tear of buildings	Follow NHDCL maintenance processes to address complaints by tenants	Housing Managemen t Cost	Housing Management	PIU / PMU

Subproject Activities / Field	Potential Environmental Impacts	Mitigation Measures	Cost	Implementatio n	Supervisio n
		 Undertake regular inspections to assess the risks, hazards or defects with the buildings and rectify these 			
	Fire safety	 Train the focal resident person on use of fire extinguishers and its maintenance Regularly check and maintain the fire extinguisher Post emergency numbers of Fire, Police near the fire extinguisher or at a visible location. 	Housing Managemen t Cost	PIU	PIU / PMU
	Accidents and emergencies and natural disaster	 Follow instructions from the Dzongkhag Disaster Management Committee (DMC) on procedures to follow in case of emergencies. Post emergency numbers for Police, Ambulance and Fire should be prominently posted at a visible spot. Maintain emergency lighting system in the premises. Conduct of periodic fire drills. Posting of emergency exit plans, designating evacuation areas, dissemination of other emergency plan information. Other training to raise awareness on how to properly behave and respond in times of fires or natural disasters. 	Housing Managemen t Cost	PIU	PIU / PMU
	Buildup of sewage that could impact surface water and groundwater	 Coordinate with District Regulatory Officer for desludging and vacuum cleaning of septic tank annually 	Housing Managemen t Cost	PIU	PIU / PMU
	Solid waste generation that could impact the environment	 Follow District waste management guidelines and garbage collection and disposal times and ensure that garbage is not allowed to accumulate on the premises. 	Housing Managemen t Cost	PIU	PIU / PMU

C. Environmental Performance

- 317. The Environmental Monitoring Plan is linked to the Environmental Management Plan. Therefore, the environmental performance of the project will be measured against the following criteria:
 - (i) Air emission and dust- number of fires being lit, number of electrical appliances being use and measures to contain dust during construction;
 - (ii) Water supply –The provision of facilities to ensure adequate water supply for construction as well as domestic needs of staff and workers;
 - (iii) Waste disposal- Receipt of waste disposal permit and the number of truckloads of excavated materials and waste segregated, reused, recycled and disposed;
 - (iv) Traffic congestion Number of accidents due to material transportation and drop off:
 - (v) Worker Health and Safety- The number of accidents and emergencies must be recorded with actions taken to prevent repeat of the same mistakes in the future; and
 - (vi) Community health and safety- The number of grievances and complaints received by the community during project construction and operation.

X. MONITORING AND REPORTING

- 318. Environmental monitoring is an obligatory aspect of project implementation. The ADB SPS requires that the borrower/client monitor and measure the progress of implementation of the EMP. The extent of monitoring activities will be commensurate with the project's risks and impacts. In addition to recording information to track performance, the borrower/client will undertake inspections to verify compliance with the EMP and progress toward the expected outcomes.
- 319. More specifically, environmental monitoring during project implementation is required to:
 - (i) assess project performance against agreed criteria;
 - (ii) identify any environmental harm and non-compliance issues;
 - (iii) provide data to support compliance;
 - (iv) prepare corrective action plans is required; and
 - (v) meet government approval/ permit conditions and ADB requirements.
- 320. The PMU with support from PIU, will monitor the progress of EMP implementation and compliance with ADB SPS requirements and national rules and regulations/guidelines. The PMU will coordinate and monitor project activities with PIU and contractor to ensure timely implementation of project activities.
- 321. The contractor will submit monthly reports to the PIU with jurisdiction over the subproject. The monthly reports will include compilation of copies of monitoring sheets accomplished and duly signed by the contractor's EHS supervisor (or equivalent) on a daily basis. A sample daily monitoring sheet which can be used by the contractor is in Appendix 10. This monitoring sheet is indicative which can be further enhanced depending on the actual situations at subproject construction site.
- 322. The PIU will submit quarterly environmental monitoring reports to PMU, which will include summary of daily monitoring activities of contractor and results of any independent monitoring or inspection activities of the PIU. A sample inspection checklist is in Appendix 11. This checklist is

indicative which can be further enhanced depending on the actual situations at subproject construction site.

- 323. PMU shall consolidate quarterly reports from the PIUs, which include reports from the PIU for this subproject, and results of its independent monitoring or inspection activities. PMU shall accomplish semi-annual environmental monitoring report (SEMRs), which shall be submitted to ADB for review and disclosure on ADB website. Submission of SEMR will continue until ADB issues a project completion report (PCR). The template for the SEMR is attached as Appendix 12.
- 324. Monitoring and reporting will be undertaken during project implementation to ensure that the procedures are being adequately implemented and to identify any modifications or corrective action that may be required to improve the efficiency of the EMP throughout the project implementation process. The environmental reporting will cover developments that have taken place in relation to the loan recipient project during the reporting period, report any changes in the design or procedures, management or site-specific situations.

Table 29: Environmental Monitoring Plan

		Method of		Responsi	bility
No.	Activity	Measurement/Indicators	Frequency	Implementation	Monitoring
Pre-	Construction				
1	Land use approval	 Land Use certificate received from National Land Commission 	PMU	PMU	PMU
2	Project design and approvals	Infrastructure design and construction approval,Demolition approval	One time	NHDCL	PMU
3	Roles and responsibilities and awareness of project site supervision team	 Office order TOR for Site supervision team Training materials Participant list 	One time	NHDCL	PMU
4	Awareness and training of contractor	 Pre-bid meeting to inform contractors No.of trainings and dates Contractor's attendance sheet 	One time	NHDCL	PMU
5	Incorporating of EMP into bid documents	EMP included in bid document	One time	NHDCL	PMU
6	Incorporating of OHS requirements into contract	OHS component included in Contract	One time	NHDCL	PMU
7	Project disclosure and information	 Project information/brief on NHCDL website, Project contact number on signboards Minutes of Meeting/Consultation with 	One time	NHDCL	PMU

		Method of		Responsibility		
No.	Activity	Measurement/Indicators	Frequency	Implementation	Monitoring	
		Affected people and community				
8	Removal of existing structures/dem olition	No. of structures removed. Report on removal/demolition of structures	One time	NHDCL	PMU	
	struction phase					
9	Consents and Permits	Tree removalWaste disposal	One time	Contractor	PIU	
10	Recruitment of workers	 No. of workers (nationals/foreign- by gender) No. of skilled and unskilled workers No. of workers below age 18 	During recruitment	Contractor	PIU	
11	Workers welfare (health and safety)	 No. of worker camps Availability of safe drinking water, electricity and sanitation facilities (with separate toilets for males and females) PPE distribution list/records Ocular inspection of the cleanliness of worker camps safety structure installed Overtime facilities provided Emergency Contact numbers displayed Assembly points identified Emergency protocols First aid kid Warning signs at risky/hazardous areas Records in accident register with incidents and actions taken. No of fire extinguishers installed at site Type and no. of trainings (training record) 	Monthly	Contractor	PIU	
12	Temporary land requirement for worker camps and storage	Land lease agreement between contractor and landowner/government	One time	Contractor	PIU	
13	Air pollution	 Use of electrical appliances Ocular observation of vehicles and site conditions Use of reconditioned machines and vehicles. 	Monthly	Contractor	PIU	

	Method of			Responsibility		
No.	Activity	Measurement/Indicators	Frequency	Implementation	Monitoring	
		Maintenance of machines				
14	Dust pollution/ minimization	Ocular observation of dust and dust suppression measures undertaken as per EMP	Monthly	Contractor	PIU	
15	Water supply and conservation	 No. of water storage tanks. Measures taken during periods of shortage. No. of water supply repair and maintenance works 	Monthly	Contractor	PIU	
16	Waste management of worker camps, construction sites	 No. and types of waste bins installed No. of truckloads of construction waste disposed Types of demolition waste segregated and reused Ocular inspection of camps and construction site Segregation, storage of hazardous waste 	Monthly	Contractor	PIU	
17	Generation of excavated soil	% soil reused for construction % soil disposed Ocular observation of soil pileup at site	One time	Contractor	PIU	
18	Site drainage	 Site drainage Connection to storm water drainage Repair and maintenance of drains Ocular observation of site drainage 	Monthly	Contractor	PIU	
19	Noise pollution and disturbance	No. of complaints received from neighboring residents/community	One time	Contractor	PIU	
20	Congestion and blockages/obstructions	No. of complaints on congestion caused by Construction traffic Ocular observation of road conditions (spillage of construction material along access road, blockage of drains and footpaths)	Monthly	Contractor	PIU	
21	Material storage	No. of material storage sheds Ocular observation on material storage at site Material inventory	Monthly	Contractor	PIU	

		Method of		Responsi	bility
No.	Activity	Measurement/Indicators	Frequency	Implementation	Monitoring
22	Community health and safety	 Consultation with community (minutes of meeting, participant list) No. of safety signs Installation of barricades Obstruction of access routes/paths No. of accidents occurred No. of complaints received 	Monthly	Contractor	PIU
23	Camp closure	Ocular observation of site conditions and compliance to EMP	One time	Contractor	PIU
Ope	ration phase				
24	Operation phase	Maintenance records	Every quarter	NHDCL estate management	PMU
25	Fire hazard	No. of fire extinguishers, and maintenance record	Once a year	NHDCL estate management	PMU
26	Sewage and sanitation	Maintenance record	Once a year	NHDCL estate management	PMU
27	Waste management	Maintenance record	Monthly	NHDCL estate management	PMU

- 325. ADB willcarryoutthefollowingmonitoringactionstosuperviseimplementation of the overall project:
 - (i) On a need basis, conduct site visits for subprojects with potential adverse environmental or social impact;
 - (ii) Conduct supervision missions with detailed review by ADB's environment/social safeguard specialists and/or officers and/or consultants for subprojects with adverse environmental and social impacts;
 - (iii) Review the SEMRs submitted by PMU to ensure that adverse impacts and risks are mitigated as planned in the EMP;
 - (iv) Work with NHDCL to rectify to the extent possible any failures to comply with its environmental safeguard commitments, as covenanted in the loan agreement and elaborated in all environmental safeguard documents; and formulate and implement a corrective action plan to re-establish compliance as appropriate; and
 - (v) Prepare a PCR that assesses whether the objective and desired outcomes of the safeguard plans have been achieved, taking into account the baseline conditions and the results of monitoring.
- 326. ADB's monitoring and supervision activities must be carried out on an on-going basis until the PCR is issued. ADB normally issues a PCR within 1-2 years after the project is physically completed and in operation.

A. Capacity Building

327. The implementing agency, NHDCL, does not have any prior experience of implementing any ADB-funded projects. Understandably, NHDCL needs a capacity building exercise in order to implement ADB SPS requirements for the project. Therefore, capacity building interventions are recommended for NHDCL, PMU, PIU and the Contractors.

- 328. When the PMU and PIU staff are assigned, it will be vital to train all these relevant personnel who will implement and monitor environment and social safeguards measures developed under the project. A consultant support (e.g., an Environment Specialist Consultant) will be provided to the PMU who will assist in conducting capacity building and training for the implementing stakeholders, including contractors. The capacity building and training program shall include, among others, the following:
 - (i) Training on ADB SPS requirements, EARF, IEE with EMP, and other national government laws, rules and regulations on environmental safeguards, including identification of roles and responsibilities for each stakeholder in the project;
 - (ii) Project compliance monitoring, and preparation and submission of environmental monitoring reports; and
 - (iii) Preparation of Corrective Action Plan, if required.

329. Specific to environmental safeguards, the Environment Specialist Consultant of the PMU will provide targeted basic training required for environmental awareness followed by specific aspects of infrastructure improvement projects along with environmental implications for projects. Specific modules customized for the available skill set will be devised after assessing the capabilities of the members of the Training Program and the requirements of the project. The entire training would cover basic principles of environmental assessment and management mitigation plans and programs, implementation techniques, monitoring methods and tools. The proposed indicative training program along with the frequency of sessions is presented in the following table.

Table 30: Training Modules for Environmental Management

rubio oo. maning moa	Frequency of	Target	Conducting
Module	Sessions	participants	Personnel
Introduction and Sensitization to Environmental Issues (One-day workshop): ADB Safeguards Policy Statement; Government of Bhutan applicable safeguard laws, regulations and policies including but not limited to core labor standards, OHS, etc.; Sensitization on environmental concerns, environmental impacts of urban infrastructure improvement projects.	Once during Preconstruction	NHDCL engineers / management team, officials responsible for implementing the Project, PMU staff, PIU staff, contractor/s.	Environmental Specialist Consultant
2. Project training on hazards, health, safety and environmental issues pertaining to the project (two-day workshop and site visits): • EMP mitigation and monitoring measures; • Roles and responsibilities; • Public relations, • Consultations; • Grievance redress; • Monitoring and corrective action planning;	Once before and during construction	NHDCL engineers and management professionals, to be involved in on- site execution and operation of the proposed facilities, PMU staff, PIU staff, contractor/s	Environmental Specialist Consultant

Module	Frequency of Sessions	Target participants	Conducting Personnel
 Reporting and disclosure; Construction site standard operating procedures (SOP); Chance finds (archaeological) protocol; Health and safety plan; Traffic management plan; 			
Waste management plan;Site clean-up and restoration.			
 3. EMP implementation (Two-day session and site visit): Implementation of EMP Identification of environment impacts Monitoring and reporting for EMP Public interactions and consultations Coordination for consents with various departments Monitoring formats filling and review of impacts. 	Once during construction stage	NHDCL Engineers, Officials responsible for implementing the Project, PMU staff, PIU staff, contractor/s.	Environmental Specialist Consultant

B. Cost of EMP Implementation and Monitoring

330. Implementation of the EMP and monitoring of environmental conditions at the site will entail costs that will be borne by the Contractor. Such costs shall be included in the bidding and contract documents to ensure that all environmental measures are implemented and monitored without any budget constraints or impediments. These costs have been estimated as far reasonably as possible, and therefore indicative, in. Costs associated with activities that are borne by the PMU, PIC or any other stakeholders other than the Contractor are not included in the estimates. Moreover, costs integral to the Contractor's BOQ costs (during construction phase), and operational cost of maintaining the housing complex (during the operation phase) are not included as well.

Table 31: Indicative Cost of EMP Implementation and Monitoring

	rable or: maleative oost or Lim implementation and monitoring						
	Activities or Items	Unit of Measure	No. of Units	Unit Cost (\$)	Total (\$)		
Α	EMP Implementation			(+/	(+/		
A.1	Providing hard barricade during trench excavation in the construction site. (Type of hard barricading with type of materials, specifications to be mentioned).	set	10	100.00	1,000.00		
A.2	Providing safety signage boards, caution tapes and green nets during construction works in site.(With information to submit posters sample with size and type of material on which it will be displayed).	LS			500.00		
A.3	Providing water sprinkling three times a day during construction works at site.(Daily reports with photographs to be submitted).	LS			100.00		
A.4	Regular health check-ups in two equal time interval (type of tests and checkups that should be done to be mentioned to Contractor and records to be submitted to client).	person	50 X 2	25.00	2,500.00		

	Activities or Items	Unit of Measure	No. of Units	Unit Cost (\$)	Total (\$)		
A.5	Trainings and awareness programs to Contractor's labors at least in the project period.(Induction training, types of job specific training should be mentioned clearly and training plan should be submitted by Contractor).	no.	3	200.00	600.00		
A.6	Provide personal protective equipment, first aid kits, fire extinguishers. (PPE extra stock of minimum 10% of total workers should be available with stock and issue register should be available for inspection. Mention the types of PPEs with specifications that should be provided to workers and staffs like safety helmet, goggles, nose mask, hand gloves, safety shoes, ear plug, face guard, etc.).	LS			5,000.00		
A.7	Placement of a dedicated Safety Officer throughout contract period for maintaining safety and protection against accidents including traffic control and EMP safeguard compliances with one standby emergency vehicle.	months	18	2,000.00	36,000.00		
В	EMP MONITORING (Air quality monitoring, set intervals for monitoring. Reports should be submitted along with the signature of witness from consultant).						
B.1	Monitoring of Air Quality at downwind location.	Samples	4 (1 location x 4)	250.00	1,000.00		
B.2	Monitoring of Noise Level at site	Site	4 (1 location x 4)	20.00	80.00		
C.	Enhancement Measures						
C.1	Landscaping after the construction period	Sqm Cost included in Contractor's BOQ cost.					
D.	COVID-19 HEALTH AND SAFETY PLAN	1					
D.1	Thermal scanners. All persons at the worksite should have their temperature screened with Infrared Thermometer (handheld non-contact). [Dr. Trust(USA) Non-Contact Forehead Temporal Artery Infrared Thermometer]	scanner	2	60.00	120.00		
D.2	Contactless attendance system. (This is biometric attendance system unit. Prices	unit	1	110.00	110.00		
D.3	for contactless system are not available) Liquid Soap & Hand washing arrangement at site	L.S.			100.00		
D.4	Contactless, sensor-based/ pedal operated sanitizer	unit	3	30.00	90.00		
D.5	[Metal foot sanitizer dispenser] Additional rest areas at sites and dining spaces	L.S.	Cost included	l in Contractor's	s BOO cost		
	in camp site		L.S. Cost included in Contractor's BOQ cost.				
D.6	Ensure availability (even tie-up) of Ambulance equipped with all necessary items like nose masks, first aid kits, aprons, disinfect solutions etc.	No additional cost required but should be monitored.					
D.7	First aid kits with hand sanitizers and hand wash liquids shall be mandatory available in all the vehicle without any lapses.	L.S.			200.00		

		Unit of	No. of	Unit Cost	Total	
	Activities or Items	Measure	Units	(\$)	(\$)	
D.8	Regular notification by local government, district authority should be adhered to, and all the staff should be compulsorily made aware of such notification.	No additional cost required but should be monitored.				
D.9	Job protection of workers during crisis period of COVID 19 pandemic needs to be ensured.	No additional cost required but should be monitored.				
F.	Contingency (10%)				4,830.00	
	Total				53,130.00	

XI. RECOMMENDATION AND CONCLUSION

- 331. The IEE process described in this document has assessed the environmental impacts of all elements of the infrastructure proposed under the Bhutan Affordable Housing Project. Potential negative impacts were identified in relation to design, construction and operation of the proposed infrastructure and it is anticipated that the subproject will not have any significant negative impacts due to the project design or location.
- 332. The NHDCL will construct 4 residential buildings on 0.85 acres of land in Zone III in the current Drungpas Residence site, which is located in the city core along Pelkhil lam. The land user certificate has been processed from the National Land Commission.
- 333. There is no need for land acquisition but resettlement plans for the Drungpa and two other persons utilizing government property will be taken care of through the resettlement plan.
- 334. There are no impacts on ecological habitats and wildlife species and there are no rivers or streams in the vicinity. The project design will take into consideration required building design regulations and guidelines to ensure earthquake resilience, climatic conditions and Bhutanese architectural designs.
- 335. All necessary approvals and permits required have been identified and will be processed with the relevant authorities. Most of the impacts will occur during the construction period for which mitigation measures have been developed and incorporated in the EMP. To ensure that all anticipated environmental impacts are addressed, NHDCL must ensure that all mitigation measures in the EMP proposed are implemented in full, as described in this document. Regular reporting by the contractor to the PIU and PMU must be adhered to so that the Environmental Monitoring Reports can accurately reflect work progress and site conditions as well as compliance to the conditions of the loan agreement, ADB safeguard policies, National regulations and the EMP.
- 336. Based on the findings of the IEE, most impacts identified have been found to be predictable, manageable and temporary. The overall conclusion of this process is that providing the mitigation, compensation and enhancement measures are implemented in full, there should be no significant negative environmental or social impacts as a result of location, design, construction or operation of the subproject. No further special study or detailed EIA needs to be undertaken to comply with ADB SPS (2009) or national regulations.

337. There should in fact be major benefits in terms of major improvements in quality of life for the residents of the Kidu Colony and lower income support staff and their families once the construction is completed.

Appendix 1: Rapid Environmental Assessment Checklist

Instructions:

- (i) The project team completes this checklist to support the environmental classification of a project. It is to be attached to the environmental categorization form and submitted to the Environment and Safeguards Division (SDSS) for endorsement by the Director, SDSS and for approval by the Chief Compliance Officer.
- (ii) This checklist focuses on environmental issues and concerns. To ensure that social dimensions are adequately considered, refer also to ADB's (a) checklists on involuntary resettlement and Indigenous Peoples; (b) poverty reduction handbook; (c) staff guide to consultation and participation; and (d) gender checklists.
- (iii) Answer the questions assuming the "without mitigation" case. The purpose is to identify potential impacts. Use the "remarks" section to discuss any anticipated mitigation measures.

Country/Project Title: Proposed Affordable Housing Developing Project

Sector Division: Urban Development

Screening Questions	Screening Questions Yes No				
A. Project Siting	163	NO	Remarks		
Is the project area					
Densely populated?	√		The site is located within the city core. The density of Phuentsholing is 48 persons per km ² .62 The limited Thromde area has a population 27,658 ⁶³		
■ Heavy with development activities?	√		Phuentsholing Thromde is the second largest Thromde in the country. The site is currently the Drungpa's residence and lies in Cluster No.17, Core Zone III. The area falls under urban village within the town core and the permissible land use is mixed (all types of residential dwellings including apartments and group housing, professional services, commercial, institutions, etc.)		
Adjacent to or within any environmentally sensitive areas?					
Cultural heritage site		✓	The closest religious site is the open park in the city center where the Zangtopelri is located, which is about 300mm away from the site.		

⁶² ADB, Phuentsholing Township Development Project

⁶³ NSB, Statistical Yearbook of Bhutan, 2020.

Screening Questions	Yes	No	Remarks
		✓	The closest protected area (Phibsoo
Protected Area			wildlife sanctuary) is more than 80km
			away.
Wetland		✓	There is no wetland in and around the
			area.
Mangrove		√	There are no coastal areas in Bhutan.
Estuarine		√	There are no coastal areas in Bhutan.
Buffer zone of protected area		✓	The closest protected area (Phibsoo wildlife sanctuary) is more than 80km away.
Special area for protecting biodiversity		√	There is no special area for protecting biodiversity in and around the area.
Bay		✓	There are no coastal areas in Bhutan.
B. Potential Environmental Impacts Will the Project cause			
 impacts on the sustainability of associated sanitation and solid waste disposal systems and their interactions with other urban services. 			The subproject involves construction of 4 residential buildings comprising of 96 units. Once built, the housing subproject will require additional Thromde resources to expand the coverage of the existing sanitation and sewerage infrastructures and waste disposal management systems so as to reach the subproject area.
deterioration of surrounding environmental conditions due to rapid urban population growth, commercial and industrial activity, and increased waste generation to the point that both manmade and natural systems are overloaded and the capacities to manage these systems are overwhelmed?		✓	The activity is within the permissible development activity and the local area plan.
degradation of land and ecosystems (e.g., loss of wetlands and wild lands, coastal zones, watersheds and forests)?		✓	The project site is far from these types of ecosystems.
dislocation or involuntary resettlement of people?	√		The current resident will be relocated and provided with housing 2 families will be compensated for loss of livelihood and removal of physical structure from the site (both do not legally own the land). A resettlement plan has been prepared.
disproportionate impacts on the poor, women and children, Indigenous Peoples or other vulnerable group?		•	Not anticipated as per social safeguards report. The project is a pro-poor and gender-inclusive undertaking as it aims to provide affordable housing to the less privileged (low-income) population of Phuentsholing. This project provides a positive impact.

Screening Questions	Yes	No	Remarks
 degradation of cultural property, and loss of cultural heritage and tourism revenues? occupation of low-lying lands, floodplains and steep 		\	The site was and will continue to be used for housing purposes. The project site is not within or near (at distances that could not impact or influence) any of the environmentally sensitive areas and cultural properties. The land use in the area is for residential purposes and will not conflict with tourism activities in the city. The area is currently being used for
hillsides by squatters and low-income groups, and their exposure to increased health hazards and risks due to pollutive industries?		·	housing.
water resource problems (e.g., depletion/degradation of available water supply, deterioration for surface and ground water quality, and pollution of receiving waters?		✓	The site is already connected by the municipal water supply line to the existing house. There is no receiving body of water nearby the site.
■ air pollution due to urban emissions?	✓		This is anticipated during construction phase. The sources of air pollution will be from trucks transporting materials to the site and machinery use, but these are required to undergo emission tests annually in compliance with the Road Safety Transport Authority. The environmental management plan (EMP) of the project will provide measures to mitigate this impact.
risks and vulnerabilities related to occupational health and safety due to physical, chemical and biological hazards during project construction and operation?	~		This is anticipated during construction phase. Occupational health and safety hazards from construction works will be mitigated through the OHS measures, many of which are mandatory by regulation. The environmental management plan (EMP) of the project will provide measures to mitigate this impact.
road blocking and temporary flooding due to land excavation during rainy season?		√	Excavation works are limited to foundation works with the site boundary so it is not expected to cause any roadblock. Site drainage will connect to the municipal drain.
■ noise and dust from construction activities?	√		Anticipated but will be temporary during construction phase and limited to the project site. The EMP of the project will provide measures to mitigate this impact.

Screening Questions	Yes	No	Remarks
traffic disturbances due to construction material transport and wastes?	√		The access road for the housing complex is along the city street (Pelkhil lam) which has heavy traffic due to its central location.
			The impact on traffic disturbance will be temporary during construction phase only. The EMP of the project will provide measures to mitigate this impact, such as for example, scheduling of the transport of materials and wastes during non-peak hours of the day.
■ temporary silt runoff due to construction?	~		This is anticipated if excavation works are undertaken during the rainy season. The EMP of the project will provide measures to avoid or minimize runoff, such as for example, avoiding or minimizing heavy excavation works during monsoon season, providing silt traps or canals around the site, etc.
hazards to public health due to ambient, household and occupational pollution, thermal inversion, and smog formation?		√	Not anticipated for a housing development project. The construction activities will be carried out within the site boundaries only.
 water depletion and/or degradation? 			During construction phase, there will be an increase in demand for water use for construction activities as well as for domestic purposes, but this will be temporary. Once the project is in operation (or when the housing units are already occupied and used), there should be no issue with water supply depletion as the same existing Thimphu residents will occupy the facility. Besides, the design includes rainwater harvesting that will reduce water dependence from the city's piped water services.
overpaying of ground water, leading to land subsidence, lowered ground water table, and salinization?		✓	Underground water will not be extracted at all. Water will be taken from the piped water supply facility in the area.
contamination of surface and ground waters due to improper waste disposal?	~		Although there is no surface water in the area, the groundwater may be impacted. This is anticipated during the construction and operation phases of the project. The EMP of the project will provide measures to avoid or minimize this impact, such as following the mandatory waste disposal through Phuentsholing's garbage collection services.

Screening Questions	Yes	No	Remarks
pollution of receiving waters resulting in amenity losses, fisheries and marine resource depletion, and health problems?		✓	This is not anticipated. The subproject site is not near receiving bodies of water used for livelihood activities or drinking water supply.
large population influx during project construction and operation that causes increased burden on social infrastructure and services (such as water supply and sanitation systems)?		~	The project will not require significant number of people who will move to Thimphu. Engaging local labor will be a priority under the project. Although the project may recruit foreign workers (if COVID restrictions are lifted), the number will not be as many (few experts). Therefore, this project will not cause significant burden to the infrastructure such as the water supply and sanitation during construction phase.
social conflicts if workers from other regions or countries are hired?	✓		Not anticipated as most workers will be Bhutanese as COVID 19 restrictions do not encourage large number of foreign workers
risks to community health and safety due to the transport, storage, and use and/or disposal of materials such as explosives, fuel and other chemicals during operation and construction?	√		Fuel, paints and other chemicals normally used for housing development will be used during construction phase, but not explosives. The EMP of the project will provide measures to avoid potential impact of fuel or chemical spills during construction phase.
community safety risks due to both accidental and natural hazards, especially where the structural elements or components of the project are accessible to members of the affected community or where their failure could result in injury to the community throughout project construction, operation and decommissioning?	√		Anticipated during construction phase. The EMP of the project will provide measures to avoid potential impacts to communities, such as for example, work areas to be clearly demarcated with signages and provided with safety barriers, and access by public will be restricted. Only workers and project concerned members will be allowed to visit the operational site.

A Checklist for Preliminary Climate Risk Screening

Country/ Project Title: Green and Resilient Affordable Housing Sector Project

(Site: Drungpa, Phuentsholing)

Sector : Water and Other Urban Infrastructure and Services

Subsector : Urban Housing

Division/Department: SAUW

	Screening Questions	Score	Remarks ⁶⁴
Location and Design of project	Is siting and/or routing of the project (or its components) likely to be affected by climate conditions including extreme weather related events such as floods, droughts, storms, landslides?	0	The site ⁶⁵ is not vulnerable to flood, erosion or landslide. However, it is located on earthquake vulnerable area.
	Would the project design (e.g., the clearance for bridges) need to consider any hydrometeorological parameters (e.g., sea-level, peak river flow, reliable water level, peak wind speed etc)?	0	No such effect envisaged.
Materials and Maintenance	Would weather, current and likely future climate conditions (e.g. prevailing humidity level, temperature contrast between hot summer days and cold winter days, exposure to wind and humidity hydro-meteorological parameters likely affect the selection of project inputs over the life of project outputs (e.g. construction material)?	0	No such effect envisaged.
	Would weather, current and likely future climate conditions, and related extreme events likely affect the maintenance (scheduling and cost) of project output(s)?	0	No such effect envisaged.
Performance of project outputs	Would weather/climate conditions, and related extreme events likely affect the performance (e.g. annual power production) of project output(s) (e.g. hydro-power generation facilities) throughout their design life time?	0	No such effect envisaged.
	Cumulative score	0	

Options for answers and corresponding score are provided below:

Response	Score
Not Likely	0
Likely	1
Very Likely	2

Responses when added that provide a score of 0 will be considered <u>low risk</u> project. If adding all responses will result to a score of 1-4 and that no score of 2 was given to any single response, the project will be assigned a <u>medium risk</u> category. A total score of 5 or more (which include providing a score of 1 in all responses) or a 2 in any single response, will be categorized as <u>high risk</u> project.

⁶⁴ If possible, provide details on the sensitivity of project components to climate conditions, such as how climate parameters are considered in design standards for infrastructure components, how changes in key climate parameters and sea level might affect the siting/routing of project, the selection of construction material and/or scheduling, performances and/or the maintenance cost/scheduling of project outputs.

⁶⁵https://www.google.com/maps/place/26%C2%B051'39.4%22N+89%C2%B023'04.5%22E/@26.8546181,89.378944 8,373a,35y,37.57h,67.45t/data=!3m1!1e3!4m9!1m3!11m2!2sLV4lZUe43MeUSvdEtHryOks8K9hqbw!3e3!3m4!1s0x 0:0x0!8m2!3d26.8609336!4d89.3845849

142 Appendix 1

Result of Initial Screening (Low, Medium, High): Low

Other Comments: Exposure of the site to climate change related hazard is low.

Prepared by: NHDCL

Appendix 2: No Mitigation Measures Scenario Checklist

SAUW No Mitigation Scenario (Scoping Checklist)

<u>Instructions:</u> Answer the questions based on subproject/package information. Discuss/consult design engineers, social safeguards team and other technical experts to ensure most recent information is used. The answers will be used in the preparation of EIA/IEE and EMP. If subproject/package will involve rehabilitation/expansion of existing facility, specify in the checklist (audit is required as part of the EIA/IEE).

PART 1: Project Characteristics

No.	Questions to be	Yes	Which	Is the effect likely to be						
	considered in Scoping	No	Characteristics of	significant? Why?						
		n/a	the Project	(See last page for						
		Not Sure	Environment could	Questions to Guide						
			be affected and	Assessing Significance of						
4 100			how?	Impacts)						
	1. Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?									
1.1		Yes	Land cover and	Not significant because the						
1.1	Permanent or temporary change in land use, land	res	aesthetics; due to	effect will not be unusual in						
	cover or topography including		new residential	the area which is already a						
	increases in intensity of land		structures at the site.	residential zone.						
	use?		This will increase the	residential zone.						
	use:		carrying capacity in							
			the area.							
1.2	Clearance of existing land,	Yes	Land cover and	Not significant because the						
	vegetation and buildings?		aesthetics; due to	clearance of vegetation						
	3		removal of existing	and buildings will not						
			vegetations.	cause large change in						
				environmental conditions.						
				The existing single storey						
				residence will be						
				demolished and Several						
				fruit (Mango (9), Litchi (2),						
				Papaya (3) Banana (2),						
				Guava (2), Betel nut (22)						
				and other trees Asoka						
				(12), Albizia (5) and a few						
				small patches of Yushinia/						
4.0	One of the second second	NI.		Bamboo will be cut						
1.3	Creation of new land uses?	No		The area is already for						
1.4	Pre-construction	Yes	Noise, due to	residential use. Not significant because the						
1.4		162	potential drilling.	activity is temporary and						
	investigations e.g., boreholes, soil testing?		potential diffilling.	any impacts are short term						
	boronoics, son testing:			and can be readily						
				mitigated through standard						
				measures.						
1.5	Construction works?	Yes	Ambient air quality	Not significant because the						
			and noise level due to	activity is temporary and						
			impacts of	any impacts are short term						
			construction works.	and can be readily						

No.	Questions to be considered in Scoping	Yes No n/a Not Sure	Which Characteristics of the Project Environment could be affected and how?	Is the effect likely to be significant? Why? (See last page for Questions to Guide Assessing Significance of Impacts)
				mitigated through standard
1.6	Demolition works?	Yes	Ambient air quality and noise level, and aesthetics; due to potential dust generation, elevated noise level and indiscriminate disposal around the site.	measures. Not significant because the activity is temporary and any impacts are short term and can be readily mitigated through standard measures.
1.7	Temporary sites used for construction works or housing of construction workers?	No		There is ample land within and adjacent to the project site, and if additional land is required for temporary housing, this will be leased from Thromde or a private party.
1.8	Above ground buildings, structures or earthworks including linear structures, cut and fill or excavations?	Yes	Ambient air quality and noise level due to potential dust generation and elevated noise level during demolition works.	Not significant because the activity is temporary and any impacts are short term and can be readily mitigated through standard measures. Excavation work will be carried out to construct four numbers of five storied buildings. Much of the excavated soil will be reused for filling and leveling works for internal access road and parking
1.9	Underground works including mining or tunnelling?	N/A		
1.10	Reclamation works?	N/A		
1.11	Dredging?	N/A		
1.12	Coastal structures e.g., seawalls, piers?	N/A		
1.13	Offshore structures?	N/A		
1.14	Production and manufacturing processes?	N/A		
1.15	Facilities for storage of goods or materials?	Yes	None.	Not significant. Construction materials that will be used are to be delivered to the site on programmed and scheduled basis. Materials that are needed day-to-day

No.	Questions to be considered in Scoping	Yes No n/a Not Sure	Which Characteristics of the Project Environment could be affected and how?	Is the effect likely to be significant? Why? (See last page for Questions to Guide Assessing Significance of Impacts)
				during construction period will be stored at a dedicated storage area at site. This storage will have a small footprint.
1.16	Facilities for treatment or disposal of solid wastes or liquid effluents?	Yes	Aesthetics and odor due to potential release of untreated effluents and indiscriminate disposal of solid wastes	Not significant because the impact can be mitigated through efficient functioning of the facilities as per design. For effluents, the site is connected to the municipal sewerage system.
1.17	Facilities for long term housing of operational workers?	N/A		
1.18	New road, rail or sea traffic during construction or operation?	No		The project site is already adjacent an existing main road.
1.19	New road, rail, air, waterborne or other transport infrastructure including new or altered routes and stations, ports, airports etc.?	No		The project site is already adjacent an existing main road.
1.20	Closure or diversion of existing transport routes or infrastructure leading to changes in traffic movements?	No		The construction phase of the project is not expected to cause any closure or diversion of routes on the adjacent road. The site is wide enough to accommodate all construction activities, equipment, etc. without disturbing the traffic flow on such adjacent road.
1.21	New or diverted transmission lines or pipelines?	No		
1.22	Impoundment, damming, culverting, realignment or other changes to the hydrology of watercourses or aquifers?	N/A		
1.23	Stream crossings?	No		There are no streams within 100m of the site
1.24	Abstraction or transfers of water from ground or surface waters?	No		The site is already connected to the local municipal water supply

No.	Questions to be considered in Scoping	Yes No n/a Not Sure	Which Characteristics of the Project Environment could be affected and how?	Is the effect likely to be significant? Why? (See last page for Questions to Guide Assessing Significance of Impacts)
1.25	Changes in water bodies or the land surface affecting drainage or run-off?	Yes	Drainage structures, due to siltation	Not significant because measures are readily available to mitigate the impact.
1.26	Transport of personnel or materials for construction, operation or decommissioning?	Yes	Noise, due to potential elevated noise during delivery of construction materials at the site.	Not significant because the activity is temporary and any impacts are short term and can be readily mitigated through standard measures. Construction materials will be transported from within Chhukha and Thimphu districts depending on availability The pre-engineered materials will be imported from India
1.27	Long term dismantling or decommissioning or restoration works?	N/A		
1.28	Ongoing activity during decommissioning which could have an impact on the environment?	N/A		
1.29	Influx of people to an area in either temporarily or permanently?	Yes	Noise due to workforce at the site during construction phase.	Not significant because the activity is temporary and any impacts are short term and can be readily mitigated through standard measures. Both foreign and national workers will be recruited by the contractor for the construction work temporarily (until the duration of the construction period)
1.30	Introduction of alien species?	No		Landscaping will be carried out with local species
1.31	Loss of native species or genetic diversity?	No		Several fruit (Mango (9), Litchi (2), Papaya (3) Banana (2), Guava (2), Betel nut (22) and other trees Asoka (12), Albizia (5) and a few small

No	Ougstions to be	Voc	Which	le the effect likely to be
No.	Questions to be considered in Scoping	Yes No	Which Characteristics of	Is the effect likely to be significant? Why?
	considered in Scoping	n/a	the Project	(See last page for
		Not Sure	Environment could	Questions to Guide
		Not out	be affected and	Assessing Significance of
			how?	Impacts)
				patches of Yushinia/
				Bamboo. These are
				common species that can
4.20	Amy other actions?	Na		be found all around.
1.32	Any other actions? I construction or operation of	No Project	use netural recourses	auch as land water
mate	rials or energy, especially any	resources		le or in short supply?
2.1	Land especially undeveloped	No		The subproject will be
	or agricultural land?			carried out on 0.85 acre of
				developed land considered
				as residential lot.
2.2	Water?	Yes	Water supply	Not significant because the
			availability, due to	water users for the
			additional users.	housing facility are already
				existing users in
				Phuentsholing district.
				Water will be used from
				existing water supply
2.3	Minerals?	Yes	Land cover and	Not significant. Although
2.0	Will lordio:	100	stability, due to	minerals such as fuel and
			potential quarrying or	other earth-based
			mining activities	resources (sand, stones,
			relative to the	marble) will be required
			production of raw	during construction, the
			materials to be used	amount will not be high to
			for construction.	cause significant impact to
				natural resources.
2.4	Aggregates?	Yes	Land cover and	Not significant. Will be
			stability, due to	required for construction
			potential quarrying or	purposes, but the amount
			mining activities	will not be high to cause
			relative to the	significant impact to
			production of raw	natural resources.
			materials to be used	
0.5	Fanada and Buck at 0	Vac	for construction.	Not almostic and Till 1
2.5	Forests and timber?	Yes	Forest cover, due to	Not significant. Timber will
			potential cutting of	be required for making
			trees.	doors and windows and
				other woodworks, but the
				amount will not be high to
				cause significant impact to natural resources.
2.6	Energy including electricity	Yes	Climate, due to	Not significant. The
	and fuels?		potential additional	increase in power demand
			power generation	brought about by the new
			from fossil fuel.	housing facility is
				marginal/negligible as
				compared with the
L	<u> </u>	i	i	

No.	Questions to be considered in Scoping	Yes No n/a Not Sure	Which Characteristics of the Project Environment could be affected and how?	Is the effect likely to be significant? Why? (See last page for Questions to Guide Assessing Significance of Impacts)
				demand of the entire locality. Future occupants of the housing facility are already existing electricity users in Phuentsholing district.
2.7	Any other resources?	No		
	I the Project involve use, stor			
	rials which could be harmful to		alth or the environmen	t or raise concerns about
	l or perceived risks to human		L 1 10	
3.1	Will the project involve use of substances or materials which are hazardous or toxic to human health or the environment (flora, fauna, water supplies)?	Yes	Human health, groundwater quality; ambient air quality, including odor. Releases of these substances can potentially pollute the different environmental media.	Solvents, primers, adhesives, paint will be utilized. However, not significant because the activity is temporary and any impacts are short term and can be readily mitigated through standard measures.
3.2	Will the project result in changes in occurrence of disease or affect disease vectors (e.g., insect or water borne diseases)?	Yes	Human health, groundwater quality; ambient air quality, including odor. Sanitation quality at the site (including Contractor's camp) could affect the hygiene or aesthetic of immediate vicinity due to wastewater releases, solid waste generation. These are potential sources of disease vectors.	Not significant because standard measures are available to mitigate the impacts.
3.3	Will the project affect the welfare of people e.g., by changing living conditions?	Yes	Better welfare of the housing beneficiaries, due to improved facilities.	Significant but on positive aspect. The subproject will provide affordable housing for residents of the Kidu Colony and wage workers in Phuentsholing. It will improve their living conditions as they are living in temporary shelters at the moment.
3.4	Are there especially vulnerable groups of people who could be affected by the project e.g., hospital patients, the elderly?	Yes	Affected stakeholders, due to potential displacement of existing	Existing tenants/residents at the site will be relocated. A resettlement plan has been prepared for the project.

No.	Questions to be considered in Scoping	Yes No n/a Not Sure	Which Characteristics of the Project Environment could be affected and how?	Is the effect likely to be significant? Why? (See last page for Questions to Guide Assessing Significance of Impacts)
			tenants/residents at the site.	
3.5	Any other causes?	No		
	I the Project produce solid wa			
4.1	Spoil, overburden or mine wastes?	Yes	Aesthetic, ambient air quality, due to potential indiscriminate handling or disposal of spoils that could pollute the environment.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts.
4.2	Municipal waste (household and or commercial wastes)?	Yes	Aesthetic, odor; due to potential dumping and mismanagement of solid wastes that could pollute the environment.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts.
4.3	Hazardous or toxic wastes (including radioactive wastes)?	Yes	Surface water quality; Ambient air quality, including Odor; due to potential releases (from solvents, primers, paints, adhesives, etc.) that could pollute the environment.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts.
4.4	Other industrial process wastes?	N/A		
4.5	Surplus product?	N/A		
4.6	Sewage sludge or other sludge from effluent treatment?	Yes	Groundwater quality, odor due to potential release of untreated effluents the could pollute the environment.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts.
4.7	Construction or demolition wastes?	Yes	Aesthetics, community safety, due to potential unmanaged bulky construction and demolition wastes.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts. Adequate arrangements with the approval by the Thromde will be made to segregate and dispose construction waste.
4.8	Redundant machinery or equipment?	No		

No.	Questions to be considered in Scoping	Yes No n/a Not Sure	Which Characteristics of the Project Environment could be affected and how?	Is the effect likely to be significant? Why? (See last page for Questions to Guide Assessing Significance of Impacts)
4.9	Contaminated soils or other material?	No		
4.10	Agricultural wastes?	No		
4.11	Any other solid wastes?	No		
5. Wil	<u> </u>	s or any ha		
5.1	Emissions from combustion of fossil fuels from stationary or mobile sources (vehicles and/or heavy equipment)?	Yes	Ambient air quality, due to emissions from heavy equipment, service vehicles, generator sets, and other vehicles, such as those transporting materials at construction sites.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts.
5.2	Emissions from production processes?	N/A		
5.3	Emissions from materials handling including storage or transport?	Yes	Ambient air quality, due to emissions from stored materials at site.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts.
5.4	Emissions from construction activities including plant and equipment?	Yes	Ambient air quality, due to emissions from heavy equipment, service vehicles, generator sets, and other vehicles, such as those transporting materials at construction sites.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts.
5.5	Dust or odors from handling of materials including construction materials, sewage and waste?	Yes		Dust will be generated during material transportation, loading and unloading and sewage will be generated in the worker camps. OHS requirements and maintenance of workers camps will be followed
5.6	Emissions from incineration of waste?	No		
5.7	Emissions from burning of waste in open air (e.g., slash material, construction debris)?	No		This is not permitted and will be restricted
5.8	Emissions from any other sources?	No		

No.	Questions to be considered in Scoping	Yes No n/a Not Sure	Which Characteristics of the Project Environment could be affected and how?	Is the effect likely to be significant? Why? (See last page for Questions to Guide Assessing Significance of Impacts)
6. Wil	If the Project cause noise and	vibration or	r release of light, heat e	nergy or electromagnetic
6.1	From operation of equipment e.g., engines, ventilation plant, crushers?	Yes	Noise level, due to noisy operation of heavy equipment (including drills, concrete mixers, tile cutters, chain saw during tree cutting), excavation work, and other construction activities at the site.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts.
6.2	From industrial or similar processes?	N/A		
6.3	From construction or demolition?	Yes	Noise level, due to noisy operation of heavy equipment (including drills, concrete mixers, tile cutters, chain saw during tree cutting), excavation work, and other construction activities at the site.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts.
6.4	From blasting or piling?	N/A		
6.5	From construction or operational traffic?	Yes	Noise level, due to noisy operation of heavy equipment (including drills, concrete mixers, tile cutters, chain saw during tree cutting), excavation work, and other construction activities at the site. Additional noise can also be generated due to increase in vehicular movement for material drop off to the site.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts.
6.6	From lighting or cooling systems?	N/A		
6.7	From sources of electromagnetic radiation (consider effects on nearby sensitive equipment as well as people)? From any other sources?	N/A No		

No.	Questions to be considered in Scoping	Yes No n/a Not Sure	Which Characteristics of the Project Environment could be affected and how?	Is the effect likely to be significant? Why? (See last page for Questions to Guide Assessing Significance of Impacts)
	II the Project lead to risks of c			
7.1	the ground or into sewers, sur From handling, storage, use or spillage of hazardous or toxic materials?	Yes	Land and ground water quality, due to potential unwanted release of fuels, solvents, primers, adhesives, paint.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts.
7.2	From discharge of sewage or other effluents (whether treated or untreated) to water or the land?	Yes	Land and ground water quality, due to potential unwanted release of untreated wastewater.	Not significant because the impacts are short term and localized. Standard measures are available to mitigate the impacts.
7.3	By deposition of pollutants emitted to air, onto the land or into water?	Yes.	Land quality and surface water quality, due to deposition of emissions from heavy equipment and other machines used during construction activities.	Not significant. The deposition, if any, is very negligible to affect the quality of surface water or land/soil in the area.
7.4 7.5	From any other sources?	No		
7.5	Is there a risk of long term build-up of pollutants in the environment from these sources?	No		
	II there be any risk of accident d affect human health or the er			of the Project which
8.1	From explosions, spillages, fires etc. from storage, handling, use or production of hazardous or toxic substances?	Yes	Humans/people, due to potential release of these substances that could affect the workers at site and nearby human receptors (residential areas, institutions)	Not significant because the impacts are short term and localized. Standard community and occupational health and safety measures are available to mitigate the impacts.
8.2	From events beyond the limits of normal environmental protection e.g., failure of pollution control systems?	N/A		
8.3	From any other causes?	No		
8.4	Could the project be affected by natural disasters causing environmental damage (e.g., floods, earthquakes, landslip, etc.)?	Yes	Humans/people, due to risk of natural disasters that could lead to injuries or death.	Not significant because there are designs available that could mitigate the impacts. The sites lies in High Seismic zone and could be

No.	Questions to be	Yes	Which	Is the effect likely to be
INU.	considered in Scoping	No	Characteristics of	significant? Why?
	considered in ecoping	n/a	the Project	(See last page for
		Not Sure	Environment could	Questions to Guide
		Not out	be affected and	Assessing Significance of
			how?	Impacts)
				affected earthquakes. The
				Buildings are designed for
				seismic performance (IS
				1893:2016, Zone V,
				Z=0.36, I=1.37, R=5,
				Damping=5%).
1	II the Project result in social copyment?	hanges, for	example, in demograph	ny, traditional lifestyles,
9.1	Changes in population size,	Yes	Humans/people, due	Positively significant during
	age, structure, social groups		to change in lifestyles	operation phase due to
	etc.?		of future occupants of	improved living conditions.
			the housing facility.	
				Not significant in terms of
				demography. The
				subproject will not increase
				the local population
				because residents or
				occupants of the housing
				facility will come from
				existing residents of
				Phuentsholing.
9.2	By resettlement of people or	Yes		Affected stakeholders will
	demolition of homes or			be resettled and
	communities or community			compensated as per the
	facilities e.g., schools,			Resettlement Plan.
	hospitals, social facilities?			
9.3	Through in-migration of new	Yes	Humans/people, due	Not significant. A new
	residents or creation of new		to new communities	community will be created
	communities?		that will be created at	at the site. However, no in-
			the location of	migration is expected
			housing facility	since residents of the
			resulting to new	housing units will be the
			dynamics within the	selected residents of
			community.	Phuentsholing, who will
			· · · · · · · · · · · · · · · · · ·	move out of their existing
				apartments in various
				parts of the district.
9.4	By placing increased	Yes	Humans/people, due	Not significant. This impact
•••	demands on local facilities or		to increased demand	is temporary during
	services e.g., housing,		from workers during	construction phase only.
	education, health?		the construction	During the operation
	oddodion, nodiur:		phase. These	phase, everything will be
			workers (those	back to normal since the
			coming from outside	future residents of the
			Phuentsholing) will increase the demand	housing units are already
				existing residents of
			for these services in	Phuentsholing who are
			the locality resulting	already being served by
			to stress on	the various services.
			availability to	

No.	Questions to be	Yes	Which	Is the effect likely to be
	considered in Scoping	No n/a	Characteristics of the Project	significant? Why? (See last page for
		Not Sure	Environment could	Questions to Guide
		itot Gui G	be affected and	Assessing Significance of
			how?	Impacts)
			accommodate such demand.	
9.5	By creating jobs during	Yes	Humans/people, due	Positive significant impact.
0.0	construction or operation or	. 55	to creation of	The subproject will
	causing the loss of jobs with		employment	generate employment for
	effects on unemployment		opportunities.	foreign workers and
	and the economy?			nationals (skilled and non-
				skilled) during construction phase.
9.6	Any other causes?			prideo.
	re there any other factors whi			
	lopment which could lead to e			ial for cumulative impacts
10.1	other existing or planned active Will the project lead to	No No	iocanty ?	The site already has
10.1	pressure for consequential	. 10		access and is adjacent to
	development which could			the main access road.
	have significant impact on the			Consequential
	environment e.g., more			development will only be
	housing, new roads, new			permitted as long as it is within the Local Area Plan.
	supporting industries or utilities, etc.?			within the Local Area Plan.
10.2	Will the project lead to	No		
	development of supporting			
	facilities, ancillary			
	development or development stimulated by the project			
	which could have impact on			
	the environment e.g.			
	supporting infrastructure			
	(roads, power supply, waste			
	or wastewater treatment,			
	etc.) housing development			
	extractive industries			
	supply industries			
	other?			
10.3	Will the project lead to after-	No		
	use of the site which could			
	have an impact on the environment?			
10.4	Will the project set a	Yes	Humans/people, due	Positively significant. If
	precedent for later		to potential future	carried out well, the
	developments?		developments that	housing complex could be
			could improve the	model for all future
			living conditions of more citizens.	housing complexes in the country.
10.5	Will the project have	No		····· j ·
	cumulative effects due to			
	proximity to other existing or			

No.	Questions to be considered in Scoping	Yes No n/a Not Sure	Which Characteristics of the Project Environment could be affected and how?	Is the effect likely to be significant? Why? (See last page for Questions to Guide Assessing Significance of Impacts)
	planned projects with similar effects?			

Part 2 - Characteristics of the Project Environment (Environmental Sensitivity)

Question	Remarks
Are there features of the local environment on or around the Project location which could be affected by the Project? • Areas which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project? • Other areas which are important or sensitive for reasons of their ecology e.g. • Wetlands, • Watercourses or other waterbodies, • the coastal zone, • mountains, • forests or woodlands • Areas used by protected, important or sensitive species of fauna or flora e.g., for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project? • Inland, coastal, marine or underground waters? • Areas or features of high landscape or scenic value? • Routes or facilities used by the public for access to recreation or other facilities? • Transport routes which are susceptible to congestion or which cause environmental problems? • Areas or features of historic or cultural importance?	There are no protected areas or critical habitats within 50km of the project site The closest water river is the Omchhu, at a distance of 300 away and separated from the site by numerous buildings and roads. The area is a within the city center, in zone III, and in the designated urban village, where the existing land use is residential housing.
Is the Project in a location where it is likely to be highly visible to many people?	The project will be visible to its immediate neighbors (other residents living in the adjacent buildings. But the entire area itself has numerous similar structures/buildings in the area
Is the Project located in a previously undeveloped area where there will be loss of greenfield land?	No, the site is the current residential house of the Drungpa
Are there existing land uses on or around the Project location which could be affected by the Project? For example: • homes, gardens, other private property, • industry, • commerce, • recreation,	No., the site is the current residential house of the Drungpa

Question	Remarks
public open space,	2 2 33
community facilities,	
agriculture,	
• forestry,	
tourism,	
mining or quarrying	
Are there any plans for future land uses on or	No
around the location which could be affected by	
the Project?	
Are there any areas on or around the location	The only effect on the residents in the buildings
which are densely populated or built-up, which	surrounding the site is from dust and noise during
could be affected by the Project?	construction
Are there any areas on or around the location	No. The closest religious and historic site is the
which are occupied by sensitive land uses	Zangtopelri which is again separated from the site
which could be affected by the Project?	by roads and buildings. It is about 300m from the
hospitals,	site.
schools,	
places of worship,	
community facilities	
Are there any areas on or around the location	No
which contain important, high quality or scarce	
resources which could be affected by the	
Project? For example:	
groundwater resources,	
surface waters,	
• forestry,	
agriculture, fish arise.	
• fisheries,	
tourism, minerals.	
Are there any areas on or around the location	No
of the Project which are already subject to	NO
pollution or environmental damage? For	
example:	
where existing legal environmental standards	
are exceeded, which could be affected by the	
Project	
Is the Project location susceptible to	Yes, the project and the town in general fall in High
earthquakes, subsidence, landslides, erosion,	earthquake hazard zone but this has been
flooding or extreme or adverse climatic	considered during design phase
conditions? For example:	gg
 temperature inversions, fogs, severe winds, 	
which could cause the Project to present	
environmental problems?	
Is the Project likely to affect the physical	No
condition of any environmental media?	
The atmospheric environment including	
microclimate and local and larger scale	
climatic conditions?	
Water – e.g., quantities, flows or levels of	
rivers, lakes, groundwater. Estuaries, coastal	
waters or the sea?	
 Soils – e.g., quantities, depths, humidity, 	
stability or erodibility of soils?	

Question	Remarks
Geological and ground conditions?	
 Are releases from the Project likely to have effects on the quality of any environmental media? local air quality global air quality including climate change and ozone depletion water quality – rivers, lakes, groundwater. estuaries, coastal waters or the sea nutrient status and eutrophication of waters acidification of soils or waters soils noise temperature, light or electromagnetic radiation including electrical interference 	Yes, Increase in dust levels during excavation and air emissions from use of heavy machines. Effects will be temporary and restricted to the construction period
 productivity of natural or agricultural systems Is the Project likely to affect the availability or scarcity of any resources either locally or globally? fossil fuels water minerals and aggregates timber other non-renewable resources infrastructure capacity in the locality - water, sewerage, power generation and transmission, telecommunications waste disposal roads, rail 	Water is becoming scarcer in the City due to increasing demand from construction activities. Mitigation measures include installation of water storage tanks and provision for rainwater harvesting
Is the Project likely to affect human or community health or welfare? • The quality or toxicity of air, water, foodstuffs and other products consumed by humans? • Morbidity or mortality of individuals, communities or populations by exposure to pollution? • Occurrence or distribution of disease vectors including insects? • Vulnerability of individuals, communities or populations to disease? • Individuals' sense of personal security? • Community cohesion and identity? • Cultural identity and associations? • Minority rights? • Housing conditions? • Employment and quality of employment? • Economic conditions?	No. The project will not affect human or community health. It is in fact expected to provide relief to the residents of the temporary kidu colony which was planned for two years only.

- Questions to Guide Significance of Impacts
 1. Will there be a large change in environmental conditions?
 2. Will new features be out-of-scale with the existing environment?
 3. Will the effect be unusual in the area or particularly complex?

- 4. Will the effect extend over a large area?
- 5. Will there be any potential for trans boundary impact?
- 6. Will many people be affected?
- 7. Will many receptors of other types (fauna and flora, businesses, facilities) be affected?
- 8. Will valuable or scarce features or resources be affected?
- 9. Is there a risk that environmental standards will be breached?
- 10. Is there a risk that protected sites, areas, features will be affected?
- 11. Is there a high probability of the effect occurring?
- 12. Will the effect continue for a long time?
- 13. Will the effect be permanent rather than temporary?
- 14. Will the impact be continuous rather than intermittent?
- 15. If it is intermittent will it be frequent rather than rare?
- 16. Will the impact be irreversible?
- 17. Will it be difficult to avoid, or reduce or repair or compensate for the effect?

Appendix 3: Sample COVID 19 Health and Safety Guidance for Contractors

CONTRACTOR GUIDELINES ON RESPONDING TO THREAT OF CORONA VIRUS DISEASE (COVID-19)

- 1. This set of guidelines has been formulated based on common practices in many countries worldwide on the fight against COVID-19, and in consonance with WHO guidance on COVID-19,⁶⁶ the ILO Workplace Response to the Coronavirus Disease outbreak,⁶⁷ and the IFC-WB Environmental, Health, and Safety (EHS) General Guidelines (April 2007). It aims to assist Contractors during construction works in response to the COVID-19 pandemic.
- 2. The Contractor will be required to comply with the requirements and recommendations from the national policies and guidelines on COVID-19, which may change from time to time.
- 3. The Contractor will employ an EHS Engineer/Officer who shall oversee compliance to the occupational health and safety (OHS) requirements particularly on prevention of COVID-19 transmission in the workplace. This shall include but not limited to the following:
 - (i) Orientation of workers on OHS, disaster and emergency response procedures, and COVID-19;
 - (ii) Provision and use of personal protective equipment (PPE), fire suppression system and appropriate medical emergency response logistics;
 - (iii) Placement of safety signs, posters (e.g., WHO posters on COVID-19), information and warning signs within the worksite and adjacent areas;
 - (iv) Implementation and maintenance of good housekeeping;
 - (v) Monitoring of occupational health and environmental controls (e.g., airborne contaminants, noise, illumination, ventilation, temperature and humidity); and
 - (vi) Conduct of regular safety inspection and incident reporting/ recording.
- 4. The Contractor will provide all subcontractors, if any, with compulsory site induction on COVID-19 response prior to start of any works. The EHS Officer will keep a record of the contact details of all workers and staff: mobile telephone number, alternate telephone, email, and address where they are staying.
- 5. The Contractor will maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment. Make sure workplaces are clean and hygienic. Surfaces (e.g., desks and tables) and objects (e.g., telephones, keyboards) need to be wiped with disinfectant regularly.
- 6. The Contractor will ensure that all persons reporting to work are healthy and in a fit state. Any person showing signs of cough and colds will not be allowed to enter the work sites and will be advised to stay at home, or follow the isolation procedure, if any, by the government.
- 7. The Contractor will ensure that staff, subcontractors (if any), and workers have access to places where they can wash their hands with soap and water. Wash stations at strategic locations within the work areas that are equipped with adequate soap and water will be provided for workers to

⁶⁶ WHO. Coronavirus disease (COVID-19) technical guidance: Guidance for schools, workplaces & institutions. 19 March 2020. https://www.who.int/docs/default-source/coronaviruse/advice-for-workplace-clean-19-03-2020.pdf

⁶⁷ ILO. ILO Standards and COVID-19 (coronavirus)23 March 2020 - Version 1.2 https://www.ilo.org/global/topics/safety-and-health-at-work/areasofwork/occupational-health/WCMS 738178/lang--en/index.htm.

wash their hands. Put sanitizing hand rub dispensers in prominent places around the workplace. Make sure these dispensers are regularly refilled. All workers will be required to practice basic hygiene such as hand washing before eating, drinking, and after using the toilet.

- 8. The Contractor will display posters promoting hand-washing, and social distancing ask local public health authority for these or consult www.WHO.int. Combine posters with other communication measures like offering guidance from EHS Officer, briefings at meetings, and information on intranet sites to promote handwashing.
- 9. The Contractor will not allow any person on medication for a specific medical condition that will impair their performance to work at the sites.
- 10. The Contractor and all subcontractors, if any, will provide the appropriate PPE for all its workers. All tools and PPE must be in good condition, fit for purpose, and receive all the mandatory and statutory inspections, checks and calibrations, as and when required. Proof that they are in good condition may be required, if needed. Workers will be responsible to wear PPE appropriately, take good care of equipment and report any defects. Have surgical masks and disposable gloves available to provide anyone who develops respiratory symptoms. All tools and equipment must be sanitized after every use.
- 11. The Contractor will actively monitor where COVID-19 infection is high. In the event COVID-19 is known in the community, the Contractor will brief and/or orient workers, staff and subcontractors, if any, that anyone with mild cough or low-grade fever (37.3°C or more) will stay at home. A work from home arrangement for office workers, if possible, can be arranged.
- 12. The Contractor will keep promoting the message that people need to stay at home even if they have only mild symptoms of COVID-19 by displaying posters with this message in the workplace, combined with other channels of communications commonly used in the workplace.
- 13. The Contractor will develop a preparedness and response plan to prevent COVID-19 infection in the workplace. The preparedness plan will be submitted to PMU for approval.

Appendix 4: Land User Certificate



















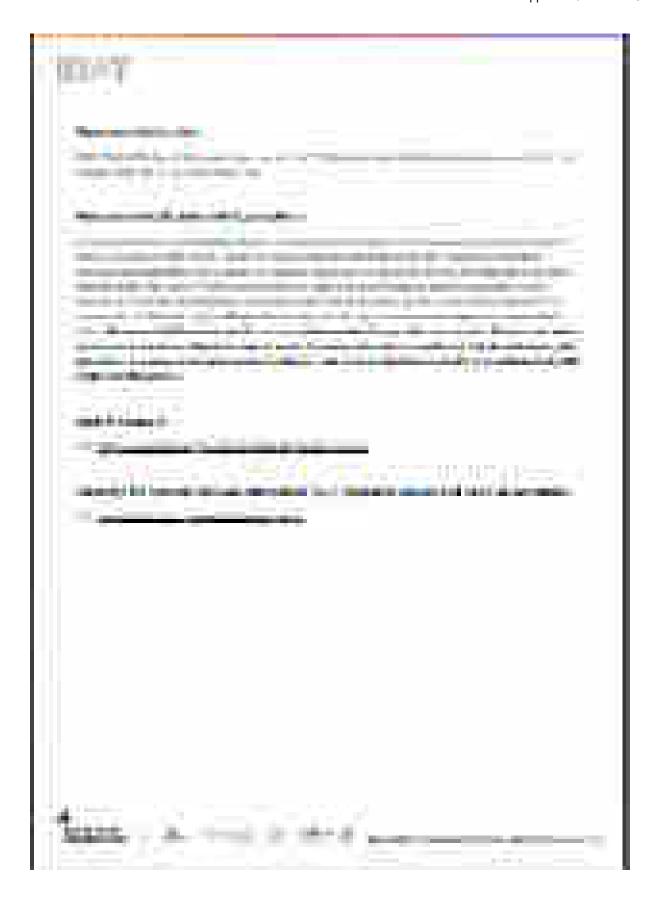












Appendix 6: Copies of Minutes of Consultation Meetings

MINUTES OF FOCUS GROUP DISCUSSIONS AT PHUENTSHOLING (PTDP / BAHP) Employed and Unemployed (Kidu Colony)

There is a difference in living in Jaigaon as compared to Phuentsholing. The advantages are that all goods are available at cheap price at the doorstep in Jaigaon. Rents are cheaper in Jaigaon. The disadvantages are that toilets are shared, and electricity charges are very high. The environment is not safe for children, especially daughters. Moreover, youth can get easily influenced to drugs and gangs. Besides, it is difficult to get timely and quality treatment during emergencies, and the tenants are at the mercy of the landlord. If they cannot pay rent, they are told to vacate.

In terms of the current housing colony at the Kidu Colony, Amochu, they are living in; there are no issues with water supply and other services. However, they do face problems with cockroach infestations and unfiltered water from the taps. They feel that after the termination of the two-year period of stay in the current Kidu Colony, they would have a difficult time to find housing in Phuentsholing because of their inability to afford high rents.

They accept that the two-bedroom apartments proposed by NHDCL are more suitable and they may just be able to afford the rental. Currently, in Jaigaon they pay Nu.2,500 for two rooms but then the toilet is outside and not integrated with the rooms. In Jaigaon, the nearer is the dwelling to the Bhutan gate, the higher is the rent.

Some suggestions that participants have is: if the government could regulate the rents in Phuentsholing in order that they can also afford to pay the rent and stay in Phuentsholing. Besides, when asked, people are more in favor of living within the Phuentsholing core city area rather than the peripheral areas such as Pasakha and Toribari. There are bus services currently provided to these areas. While the bus fare to Pasakha is Nu. 25/trip from Phuentsholing, the bus fare to Toribari is Nu. 15/trip. Another reason for preferring living accommodations in Phuentsholing is the easy access to educational, health and short distance to Jaigaon.







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MINUTES OF FOCUS GROUP DISCUSSIONS AT PHUENTSHOLING (PTDP / BAHP)

FGD with NHDCL and Government staff (those currently living in NHDCL housing and those who are not but have applied)

The NHDCL Liaison Officer presented the floor plans and designs of the housing units planned in Phuentsholing as well as the location identified. He also informed that the lowest rent would be Nu. 4,400 for a two-bedroom apartment and Nu, 3,000 for a one-room apartment.

Most participants were in favor of a two-bedroom apartment justifying that they needed more space for their goods and other belongings as well as for guests and moreover the rent seemed affordable. The present living conditions are characterized by small, congested spaces, water shortages, dilapidated conditions of the housing units entailing frequent repairs which are not undertaken regularly and even when there are urgent repairs to be done addressing the damages is dependent on budget availability and workmen to repair the damages so often tenants land up taking up the repairs themselves at their own cost.

However, in the new housing they preferred sliding windows reinforced with grills especially on the ground floor. Some stated that grills were also required in the open space along the stairway which if kept open would encourage easy entry of robbers to balconies of the people living on the first floor and above. They also felt that as Phuentsholing is a hot area and prone to dengue, if net screens could be provided in doors and windows, this would help tenants keeping internal areas cool but also prevent dengue mosquitoes.

An additional request is that if NHDC could fix the rent as per location as they felt for the same space, they should have different rents depending on distance from the city center. For example, for a two-bedroom apartment it is justified to have lower rent in Pasakha than in Phuentsholing because of the distance from the center, as with private housing, where one can find cheaper housing the further from the Centre one goes.

On the idea of ownership schemes for housing units, the participants are of the opinion that though in principle the idea is very good; but in practice, it will be difficult to implement because civil servants are usually posted to a location for 3-5 years and after that as per rules they must be transferred to another place. This will be inconvenient in terms of occupancy of the unit they have opted to own.

Each NHDCL colony and buildings have a Representative who coordinates waste management and cleanliness in the colony, coordinates maintenance when there is a need expressed by residents through an application form, parking control and ensures regular delivery of services. The challenges that Representatives face is that there are no incentives especially when they spend their own funds (for mobile vouchers) for calling up people. Further, they face the challenge of people not adhering to their notices and requests to participate or collaborate in common events for e.g., cleaning campaigns.

The process of availing maintenance services is that tenants fill out a form and submit to NHDCL through their representatives. The NHDCL deputes its technicians to make an assessment. If its routine maintenance like buying sockets and bulbs etc. tenants buy these themselves and technicians help in fixing the installations if they cannot manage. For other maintenance beyond their capacity, NHDCL technicians carry these out. All apartments are handed over with inventories to new tenants and on exit the inventory is again referred to ascertain that all that was

provided is available at the end of the tenure. Payments of bills are made by tenants themselves to the service providers. Rental can be deposited by electronic transfer or cheque or cash to NHDCL's account.

Participants feel that it is better to have individual water meters because some families use a lot more if they have more family members but pay the same as everyone else – even those with few members who consume less water than others. They also suggest that at the beginning itself if NHDCL should install good quality electrical and plumbing fixtures and fittings to deter repeated damage and repairs due to inferior quality. Also, these brands should be locally available (for example ROMA) so that people can purchase these locally and repair/replace the damaged ones immediately.







Appendix 7: COVID-19 Safety Guidelines for Field-Based Consultation Activities

A. Introduction

- 1. The Green and Resilient Affordable Housing Sector Project (GRAHSP) will assist the Royal Government of Bhutan (RGOB) establish infrastructures (i.e., shelters and recycled waste livelihood facilities) and provide services [i.e., business development, child care centers (crèches), integrated services for survivors of gender based violence (GBV)] for vulnerable women (victims/survivors of violence, poor working mothers caring for children and marginalized informal sector workers) in Thimphu and Phuentsholing municipalities (*thromde*) while also adopting climate adaptation and disaster risk reduction in housing projects. The Project is in line with ADB's Strategy 2030, the Country Partnership Strategy (2019-2023) and the 12th Five-Year Plan's national key result area (NKRA) of gender equality and sustainable human settlements. NKRA aims to remove barriers (including GBV) that limit the opportunities and potentials of women and girls by creating enabling policies and providing adequate support services. The Project is also aligned with the Disaster Management Act (2013) and supports a systematic approach to disaster risk management.
- 2. As an integral part of administering this project and to comply with ADB Safeguard Policy Statement, continuing meaningful consultations will be undertaken with stakeholders. This activity may be undertaken through a combination of online, virtual and in-face consultations. However, as COVID-19 still prevails, travel to sites for in-face consultations shall need to be undertaken with due regard to compliance with appropriate safety protocol as discussed in detail in this document.

B. About the Corona Virus Disease

3. Coronavirus disease (COVID-19) is an infectious disease caused by a newly discovered coronavirus. Most people infected with the COVID-19 virus will experience mild to moderate respiratory illness and recover without requiring special treatment. Older people and those with underlying medical problems like cardiovascular disease, diabetes, chronic respiratory disease, and cancer are more likely to develop serious illness. The COVID-19 virus spreads primarily through droplets of saliva or discharge from the nose when an infected person coughs or sneezes. Precautions can be implemented to prevent and slow down the transmission of the virus⁶⁹.

C. Common Symptoms of Corona Virus Disease⁷⁰

4. COVID-19 affects different people in different ways. Most infected people will develop mild to moderate illness and recover without hospitalization.

Most common symptoms:

- fever.
- dry cough.
- tiredness.

Less common symptoms:

aches and pains.

⁶⁸ Gross National Happiness Commission. 2019. Twelfth Five-Year plan. 2018-2023. Thimphu.

⁶⁹ World Health Organization. https://www.who.int/health-topics/coronavirus#tab=tab_1

⁷⁰ World Health Organization. https://www.who.int/health-topics/coronavirus#tab=tab_3

- sore throat.
- diarrhea
- conjunctivitis.
- headache.
- loss of taste or smell.
- a rash on the skin, or discoloration of fingers or toes.

Serious symptoms:

- difficulty breathing or shortness of breath.
- chest pain or pressure.
- loss of speech or movement.

D. Personal Protective Equipment that should be worn by field team

- 5. While in the field, all the members of the consultation team shall use or wear proper personal protective equipment (PPE) at all times. These PPEs may be removed on certain circumstances only, such as, but not limited to, eating, drinking, and any other task or activity that the PPE may inhibit the action. However, during these times, strict observance of social distancing is required.
- 6. The most common type of PPEs that should be worn by the field team are the following:
 - Reusable mask or surgical mask. Reusable masks should be maintained clean per the manufacturer's instruction. Surgical masks should not be reused.
 - <u>Face shield</u>. This PPE is especially useful for the field workers when talking to various people in a relatively confined space or indoors.
 - <u>Gloves</u>. This is especially useful in situations in the field where items are being passed around from one hand to another, and no available hand sanitizers, or water and soap for handwashing after the activity.

E. Safety Protocol for Field Work

- Field Team Composition
- 7. Strictly comply and observe with the condition that field team composition, including assistants, drivers, helpers, etc., should be pre-identified. These team members should only be the ones going to the field.
 - The field team should ensure the following:
- 8. Before undertaking the field visits, ensure that the local/district administration of a target site for consultation has been informed about the visit. Obtain necessary permits, if required.
- 9. Never carry out activities in areas under lockdown, if any, and undertake consultations in such areas after restrictions are lifted and necessary approvals are obtained for field activity.
- 10. Maintain adequate stock of face masks and hand sanitiser for field team; including single-use surgical masks for participants.
- 11. The team should have handheld contactless temperature scanner and pulse oximeter (minimum 2-sets).

- a) Test all members of the field team every morning before starting of field visit or activity to ensure no member is having a fever (above 100 F or 38 C) and ensure oxygen saturation level is normal (above 95).
- b) Once in the field or venue of consultations, the team should test the temperature of every participant.
 - i. The temperature of a participant should likewise be below 100 F or 38 C.
 - ii. If the temperature is high, advise such participant to immediately go home, take a rest and consult a doctor.
- 12. Community consultation should be held only if allowed by local or district administration and if situation permits. Otherwise, avoid consultations.
 - a) If consultations are conducted, ensure it is held in the open and that participants are seated at least 1-meter apart (or as per local rules on social distancing).
 - b) Ensure there is no handshaking or any physical contact among the team members and participants.
- 13. Check daily the latest information on areas where COVID-19 is spreading and ensure no field activity is undertaken in any area declared under lockdown.
- 14. Ensure that no member of the field team belongs to the high-risk category, or those with medical conditions such as diabetes, heart disease, lung disease, etc.
- 15. Mobile phones of the field team, laptop, etc need to be wiped with disinfectant daily on return from the field.
- 16. If a big group of participants or a wide venue is expected for a consultation activity, ensure to bring portable microphones and audio system to avoid shouting or avoid drawing participants close to the speaker or discussant.
 - Each field team member should strictly adhere to the following safety measures:
- 17. Use facemasks with reliable and known quality in every field consultation activity. At the end of each day of consultation activity and upon reaching home/place of stay, cut the mask into two pieces (to prevent recycling) and safely dispose following local or national guidelines. Wash hands with soap afterwards.
- 18. Use a shoulder bag for carrying hand sanitiser, single-use surgical masks, hand towel, identity card, water bottle, etc.
- 19. Wear mask before setting out to the field location and the mask should be worn throughout the day until return to place of stay or residence, unless in special or unavoidable circumstances as discussed in the use of PPE above.
 - a) Before putting on the mask, clean hands with alcohol-based hand sanitise or soap and water.
 - b) Cover mouth and nose with mask and make sure there are no gaps between the face and the mask.

- c) Avoid touching the mask while using it; if it is touched, clean hands with alcohol-based hand sanitise immediately after touching the mask.
- d) To handle a reusable mask: remove it from behind (do not touch the front of the mask); clean hands with alcohol-based hand rub or soap and water; and wash the mask with washing soap and dry it in sunlight.
- 20. When multiple small group consultations are undertaken, ensure to clean hands thoroughly with an alcohol-based hand sanitiser at every end of each consultation.
 - a) Avoid touching eyes, mouth, and nose after using the hand sanitiser. Spare a few minutes for the hands to dry up. The hand sanitizer can cause irritation.
 - b) Store the hand sanitizers in safe places and out of reach of children. Hand sanitizers can be poisonous when swallowed.
 - c) Recommended hand sanitizers are alcohol-based. Ensure to handle them with care as these can be flammable.
- 21. Carry a freshly washed hand towel every day to dry your hands after washing.
- 22. Maintain at least 1 meter distance (or as per local rules on social distancing) the participants and any others during the consultation activities.
 - a) If the place of consultation is deemed congested and may be difficult to maintain the minimum distance, ensure that the participants wear masks throughout the discussion.
 - b) Ensure that single-use surgical masks are available for participants who do not have their own.
 - c) Request participants to maintain distance and avoid congregating too close when the discussion is in progress.
- 23. As much as possible, avoid touching eyes, nose, and mouth until reaching home. Once at home or place of stay, take a bath immediately and observe all necessary actions to protect members of the household from possible COVID-19 infection.
 - a) Use shampoo and wash hair thoroughly.
 - b) Wash clothes and dry them in sunlight.
 - c) All gadgets and materials used during field work should be disinfected, put in one bag and keep away from any family member.
 - d) Dispose of used face masks properly as described above. Face shields should be properly washed or disinfected as well.
- 24. Avoid public transport for local travel, if possible, and use dedicated vehicle/motorcycle (owned or rented by the project) to reach project sites.
 - a) Where possible, the team shall only use dedicated vehicles to and from the sites.
 - b) If motorcycle or taxi is used, ensure to abide by the passenger limit imposed by the local or national government on the use of these transportations.
- 25. When feeling or suffering from any minor symptoms such as cough, headache, mild fever, stay at home and do not participate in the consultation activity.
 - a) At home, be isolated from others.

b) Call the nearest government COVID-19 health care contact person and give details of symptoms. Provide any other relevant information as may be needed by the health care contact person.

F. Important

26. The project will facilitate testing of the team members for COVID-19 prior to deployment. Only members with negative results will participate in consultation activities. If a team member is tested positive, then such team member should immediately contact the appropriate local authority and follow all local/national guidelines governing patients of COVID-19.

Appendix 8: Sample Grievance Redress Form

SAMPLE GRIEVANCE REGISTRATION FORM

(To be available in the local language)

Thequeries and comments regarding to provide their name and contact and feedback. Should you choose to include confidential, please inform us by very second confidential.	project implements information to enal	ation. We end ble us to get i tails but wa	n touch with yo	s with grie u for clarif ation to r	evance ication remain
Date	Place of registration	on			
Contact Information/Personal Det	ails				
Name		Gender	MaleFemale	Age	
Home Address					
Village /					
Town District					
Phone no.					
E-mail					
Complaint/Suggestion/Comment/ your grievance below: If included as attachment/note/letter How do you want us to reach you	, please tick here:		·		
FOR OFFICIAL USE ONLY Registered by: (Name of Official	I registering grieva	nce)			
1. Caracita by. (Ivallic of Official	r registering grieva	1100)			
Mode of communication: Note/Letter E-mail Verbal/Telephonic Reviewed by: (Names/Positions	of Official(s) revie	wing grievan	ce)		
Action Taken:					
Whether Action Taken Disclos	ed:				
		Yes No			

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Means of Disclosure:

Appendix 9: Suggested Template for Record-Keeping of Grievances

S. No.	Date of receipt of grievance	Name and contact details of complainant	Description of complaint	Nature of complaint	Decisions taken	Response given to complainant and date	Whether closed/ resolved

Appendix 10: Sample Environmental Site Inspection Checklist for Contractors DAILY MONITORING SHEET FOR CONTRACTORS

GREEN AND RESILIENT AFFORDABLE HOUSING SECTOR PROJECT **Contractor Monitoring Sheet**

Name of Subproject:	
Location of Subproject:	
Chainage covered (for linear works):	
Supervising PIU:	
Contractor:	
Contractor EHS Supervisor (or equivalent):	
Date of monitoring:	

Summary of Findings							
Monitoring Item	Status	Remarks					
1. Compliance with Local Permit	(Secured / Application						
Requirements	Submitted / Not Applicable)						
Location/zoning permits							
Permit to construct							
Building permit							
Transport / hauling permits							
2. Compliance with IEE Requirements	(Approved / Under Preparation / Submitted to PIU for Approval)						
Site-specific EMP (SEMP)							
Corrective Action Plan if any							
3. Compliance with SEMP							
Construction Site	(Satisfactory / Needs Improvement / Not Implemented)						
- Conduct of toolbox talk							
- Use of PPE							
- Rest areas for male and female workers							
- Toilets for male and female workers							
- Medical kits							
- Drinking water supply							
- Dust control							
- Noise control							
- Solid waste management							
- Wastewater management							
- Chemicals storage (fuel, oil, etc.)							
- Siltation or erosion control							
- Heavy equipment staging / parking area							
- Barricades around excavation sites							
- Access to residential							
houses/shops/businesses							
- Traffic routing signages							
- Lightings at night							
- Trench shoring / landslide protection							

Monitoring Item	Status	Remarks
Construction Workers' Camp Site	(Available / Needs Improvement / Not Available)	
- Quarters for male and female workers		
 Sleeping utilities (e.g., beds, pillows, blankets, mosquito nets, etc.) 		
- Power/Electricity supply		
- Drinking water supply		
- Toilets for male and female workers		
 General purpose water supply (cooking, washing, bathing) 		
- Cooking facilities and areas		
- Solid waste management		
- Wastewater management		
- Pest control		
4. Implementation of GRM	(Yes / No or None / Under Resolution)	
Complaints		
Complaints resolution		
5. Environmental Quality Measurement	(Passed / Failed / Not Applicable)	
Ambient air quality sampling		
Noise level measurement		
Receiving water quality sampling		

Other Issues:						

Attachments:

- Copies of permits obtained, if any.
 Photos taken at worksites, if any.

(photos attached in previous monitoring sheets should not be used again).

3. Laboratory results of environmental quality measurements, if any.

Prepared by:		
-	Name, Designation and Signature	

Appendix 11: Sample Environmental Site Inspection Checklist for PMU/PIU INSPECTION CHECKLIST FOR PMU AND PIUs

GREEN AND RESILIENT AFFORDABLE HOUSING SECTOR PROJECT SITE INSPECTION CHECKLIST

Subproject:	Date:
Location:	
Chainage (for linear works):	

	Monitoring/Inspection Questions		inding	10	Comments / Clarifications
1.	Supervision and Management Onsite	Yes	No	NA	Comments / Clarifications
1.	a. Is an EHS supervisor available?	165	INO	INA	
	c. Are daily toolbox talks conducted on site?				
2	The Facilities	Yes	No	NA	
2.		165	INO	INA	
	 a. Are there a medical and first aid kits on site? 				
	 b. Are emergency contact details available on-site? 				
	c. Are there PPEs available? What are they?				
	d. Are the PPEs in good condition?				
	e. Are there firefighting equipment on site?				
	f. Are there separate sanitary facilities for male and female workers?				
	g. Is drinking water supply available for workers?				
	h. Is there a rest area for workers?				
	 i. Are storage areas for chemicals available and with protection? in safe locations? 				
3.	Occupational Health and Safety	Yes	No	NA	
	a. Are the PPEs being used by workers?				
	b. Are excavation trenches provided with				
	shores or protection from landslide?				
	c. Is breaktime for workers provided?				
	d. How many for each type of collection				
	vehicle is in current use?				
4.	Community Safety	Yes	No	NA	
	a) Are excavation areas provided with barricades around them?				
	b) Are safety signages posted around the sites?				
	c) Are temporary and safe walkways for				
	pedestrians available near work sites?				
	d) Is there a record of treated wastewater quality testing/measurement?				
5.	Solid Waste Management	Yes	No	NA	
	Are excavated materials placed sufficiently away from water courses?				
	b. Is solid waste segregation and management in place?				

	Monitoring/Inspection Questions	F	inding	16	Comments / Clarifications
	c. Is there a regular collection for solid	•		, -	
	wastes from work sites?				
6		Vaa	NIa	NIA	
6.	Wastewater Management	Yes	No	NA	
	a) Are there separate sanitary facilities for				
	various types of use (septic tanks,				
	urination, washing, etc.)?				
	b) Is any wastewater discharged to storm				
	drains?				
	c) Is any wastewater being treated prior to discharge?				
	d) Are measures in place to avoid siltation of nearby drainage or receiving bodies of				
	water?				
	e) Are silt traps or sedimentation ponds				
	installed for surface runoff regularly				
	cleaned and freed of silts or sediments?				
7.	Dust Control	Yes	No	NA	
	a. Is the construction site watered to				
	minimize generation of dust?				
	b. Are roads within and around the				
	construction sites sprayed with water on				
	regular intervals?				
	c. Is there a speed control for vehicles at				
	construction sites?				
	d. Are stockpiles of sand, cement and other				
	construction materials covered to avoid				
	being airborne?				
	e. Are construction vehicles carrying soils				
	and other spoils covered?				
	f. Are generators provided with air pollution				
	control devices?				
	g. Are all vehicles regularly maintained to				
	minimize emission of black smoke? Do				
	they have valid permits?				
8.	Noise Control	Yes	No	NA	
	a) Is the work only taking place between 7				
	am and 7 pm, weekdays?				
	b) Do generators operate with doors closed				
	or provided with sound barrier around				
	them?				
	c) Is idle equipment turned off or throttled				
	down?				
	d) Are there noise mitigation measures				
	adopted at construction sites?				
	e) Are neighboring residents notified in				
	advance of any noisy activities expected				
	at construction sites?				
9.	Traffic Management	Yes	No	NA	
J.	a) Are traffic signages available around the				
	construction sites and nearby roads?				
-	b) Are re-routing signages sufficient to				
	guide motorists?				
<u> </u>	_				
	provided with barricades with reflectors?				

	Monitoring/Inspection Questions	is Fin		S	Comments / Clarifications
	d) Are the excavation sites provided with sufficient lighting at night?				
10.	Recording System	Yes	No	NA	
	 a) Do the contractors have recording system for SEMP implementation? 				
	b) Are the daily monitoring sheets accomplished by the contractor EHS supervisor (or equivalent) properly compiled?				
	 Are laboratory results of environmental sampling conducted since the commencement of construction activities properly compiled? 				
	d) Are these records readily available at the site and to the inspection team?				

Other Issues:		
Prepared by:		_
	Name, Designation and Signature	

Appendix 12: Semi-annual Environmental Monitoring Template

I. INTRODUCTION

- Overall project description and objectives
- Environmental category as per ADB Safeguard Policy Statement, 2009
- Environmental category of each subproject as per national laws and regulations
- Project Safeguards Team

Name	Designation/Office	Email Address	Contact Number	Roles
1. PMU				
2. PIUs				
3. Consultants				

- Overall project and sub-project progress and status
- Description of subprojects (package-wise) and status of implementation (preliminary, detailed design, on-going construction, completed, and/or O&M stage)

Package	Components/List		Status of Implementation	If On-going	If On-going Construction		
Number	of Works	(specify if under bidding or contract awarded)	(Preliminary Design/Detailed Design/On-going onstruction/Completed/O&M) ⁷¹	%Physical Progress	Expected Completion Date		

 $^{^{71}\ \}mbox{lf}$ on-going construction, include %physical progress and expected date of completion

II. COMPLIANCE STATUS WITH NATIONAL / STATE / LOCAL STATUTORY ENVIRONMENTAL REQUIREMENTS⁷²

Package No.	Subproject Name	Statutory Environmental	Status of Compliance ⁷⁴	Validity if	Action Required	Specific Conditions that
		Requirements ⁷³	-	obtained	-	will require
						environmental monitoring as
						per
						Environment
						Clearance,
						Consent/Permit
						to Establish ⁷⁵

III. COMPLIANCE STATUS WITH ENVIRONMENTAL LOAN COVENANTS

No. (List schedule and	Covenant	Status of Compliance	Action Required
paragraph number of			
Loan Agreement)			

IV. COMPLIANCE STATUS WITH THE ENVIRONMENTAL MANAGEMENT PLAN (REFER TO EMP TABLES IN APPROVED IEE/S)

 Confirm if IEE/s require contractors to submit site-specific EMP/construction EMPs. If not, describe the methodology of monitoring each package under implementation.

Package-wise IEE Documentation Status

Package		Final IEE based or	Site-specific	Remarks		
Number	Not yet due (detailed design not yet completed)	Submitted to ADB (Provide Date of Submission)	Disclosed on project website (Provide Link)	Final IEE provided to Contractor/s (Yes/No)	EMP (or Construction EMP) approved by Project Director? (Yes/No)	

All statutory clearance/s, no-objection certificates, permit/s, etc. should be obtained prior to award of contract/s. Attach as appendix all clearance obtained during the reporting period. If already reported, specify in the "remarks" column.

⁷³ Specify (environmental clearance? Permit/consent to establish? Forest clearance? Etc.)

⁷⁴ Specify if obtained, submitted and awaiting approval, application not yet submitted

⁷⁵ Example: Environmental Clearance requires ambient air quality monitoring, Forest Clearance/Tree-cutting Permit requires 2 trees for every tree, etc.

• For each package, provide name/s and contact details of contractor/s' nodal person/s for environmental safeguards.

Package-wise Contractor/s' Nodal Persons for Environmental Safeguards

Package Name	Contractor	Nodal Person	Email Address	Contact Number

• With reference to approved EMP/site-specific EMP/construction EMP, complete the table below

Summary of Environmental Monitoring Activities (for the Reporting Period)⁷⁶

Impacts (List from IEE)	Mitigation Measures (List from IEE)	Parameters Monitored (As a minimum those identified in the IEE should be monitored)	Method of Monitoring	Location of Monitoring	Date of Monitoring Conducted	Name of Person Who Conducted the Monitoring
Design Phas	e		1			
Pre-Constru	ction Phase					
Construction	n Phase					
						·
Operational	Phase					
			•			

-

⁷⁶ Attach Laboratory Results and Sampling Map/Locations

Overall Compliance with CEMP/EMP

No.	Sub-Project	EMP/ CEMP	CEMP/ EMP	Status of Implementation	Action Proposed
	Name	Part of Contract	Being	(Excellent/ Satisfactory/	and Additional
		Documents	Implemented	Partially Satisfactory/	Measures
		(Y/N)	(Y/N)	Below Satisfactory)	Required

V. APPROACH AND METHODOLOGY FOR ENVIRONMENTAL MONITORING OF THE PROJECT

 Briefly describe the approach and methodology used for environmental monitoring of each sub-project.

XII. MONITORING OF ENVIRONMENTAL IMPACTS ON PROJECT SURROUNDINGS (AMBIENT AIR, WATER QUALITY AND NOISE LEVELS)

- Discuss the general condition of surroundings at the project site, with consideration of the following, whichever are applicable:
 - Confirm if any dust was noted to escape the site boundaries and identify dust suppression techniques followed for site/s.
 - Identify if muddy water is escaping site boundaries or if muddy tracks are seen on adjacent roads.
 - Identify type of erosion and sediment control measures installed on site/s, condition of erosion and sediment control measures including if these are intact following heavy rain;
 - Identify designated areas for concrete works, chemical storage, construction materials, and refueling. Attach photographs of each area in the Appendix.
 - o Confirm spill kits on site and site procedure for handling emergencies.
 - Identify any chemical stored on site and provide information on storage condition.
 Attach photograph.
 - Describe management of stockpiles (construction materials, excavated soils, spoils, etc.). Provide photographs.
 - Describe management of solid and liquid wastes on-site (quantity generated, transport, storage and disposal). Provide photographs.
 - Provide information on barricades, signages, and on-site boards. Provide photographs in the Appendix.
 - o Indicate if there are any activities being under taken out of working hours and how that is being managed.
- Briefly discuss the basis for environmental parameters monitoring.
- Indicate type of environmental parameters to be monitored and identify the location.
- Indicate the method of monitoring and equipment used.
- Provide monitoring results and an analysis of results in relation to baseline data and statutory requirements.

As a minimum the results should be presented as per the tables below.

Air Quality Results

Site No.	Date of Testing	Site Location -	Parameters (Government Standards)			
			PM10 μg/m3	SO2 μg/m3	NO2 μg/m3	

	Date of Testing		Parameters (Monitoring Results)			
Site No.		Site Location	PM10	SO2	NO2	
			μg/m3	μg/m3	μg/m3	

Water Quality Results

			Parameters (Government Standards)					
Site No.	Date of Sampling	Site Location	pН	Conductivity	BOD	TSS	TN	TP
	• 0		_	μS/cm	mg/L	mg/L	mg/L	mg/L

			Parameters (Monitoring Results)					
Site No.	Date of Sampling	Site Location	pН	Conductivity	BOD	TSS	TN	TP
				μS/cm	mg/L	mg/L	mg/L	mg/L

Noise Quality Results

Site No.	Date of Testing	Site Location	LA _{eq} (dBA) (Government Standard) Day Time Night Time	
			Day Time	Night Time

Site No.	Date of Testing	Site Location	LA _{eq} (dBA) (Monitoring Results)			
Site No.			Day Time	Night Time		

VI. GRIEVANCE REDRESS MECHANISM

• Provide information on establishment of grievance redress mechanism and capacity of grievance redress committee to address project-related issues/complaints. Include as appendix Notification of the GRM (town-wise if applicable).

VII. COMPLAINTS RECEIVED DURING THE REPORTING PERIOD

 Provide information on number, nature, and resolution of complaints received during reporting period. Attach records as per GRM in the approved IEE. Identify safeguards team member/s involved in the GRM process. Attach minutes of meetings (ensure English translation is provided).

VIII. SUMMARY OF KEY ISSUES AND REMEDIAL ACTIONS

Summary of follow up time-bound actions to be taken within a set timeframe.

IX. APPENDIXES

- Photos
- Summary of consultations
- Copies of environmental clearances and permits
- Sample of environmental site inspection report
- All supporting documents including <u>signed</u> monthly environmental site inspection reports prepared by consultants and/or contractors
- Others

SAMPLE ENVIRONMENTAL SITE INSPECTION REPORT

Name Position		Name Position				
Sign off						
Signature 						
Site Restored to Original Condition	Yes	No				
Hazardous Substances		Trees and Vegetation				
Noise pollution		Dust and Litter Control				
Air Quality		Reuse and Recycling				
Emissions	Waste Mini					
	spection					
		Guarantee Period				
		Pre-Commissioning				
Resolution	Project Activity Stage	Implementation				
		Design				
		Survey				
Incident Issues						
Intervention Steps:						
INCIDENT: Nature of incident:						
Satisfactory Insatisfactory In	ncident	Resolved Unre	esolved			
CONCLUDING SITE CONDITION:						
INITIAL SITE CONDITION:						
WEATHER CONDITION:						
LOCATION:		GROUP:				
NAME: TITLE:		DMA:				
Project Name Contract Number						