

SAFEGUARDS AND SOCIAL DIMENSIONS SUMMARY

A. Introduction

1. The Telecommunication Towers Infrastructure Project in Myanmar is classified category B for the environment and category C for involuntary resettlement and indigenous peoples impacts, pursuant to the Safeguard Policy Statement (2009) of the Asian Development Bank (ADB). ADB funds will support the borrower to rollout up to 5,000 towers nationwide. In compliance with the Safeguard Policy Statement's requirements for the general corporate finance financing modality, an environmental and social compliance audit has been conducted, including an on-site assessment, to identify past or present concerns related to impacts on environment, health, safety; involuntary resettlement; and indigenous peoples. The borrower, Irrawaddy Green Towers (IGT), has established an integrated quality, health, safety, and environment (QHSE) management system, organized to comply with ISO 9001 and 14001 and OHSAS 18001. The objectives of the compliance audit is to determine whether the IGT's procedures and systems for environment and social actions were in accordance with ADB's safeguard principles and requirements for borrowers or clients, and to identify and plan appropriate measures to address outstanding compliance issues.

B. Environment

2. The impacts during construction and operation of telecommunication towers and associated power supply units are expected to be localized and specific to the footprint of the tower locations, each of about 250 square meters.¹ IGT applies environmental and social site selection criteria to avoid ecologically sensitive habitats, legally protected areas, and cultural heritage sites.² The potential construction impacts from noise, soil erosion, wastes, and air and water pollution are short-term and temporary, and can be readily mitigated. Potential residual impacts during operations (visual, pollution of land and water from hazardous materials and wastes and occupational and community health and safety risks such as noise and electromagnetic exposure) can also be mitigated through engineering measures.

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3. IGT has designated an experienced QHSE manager supported by a QHSE officer and auditors trained to assist in the monitoring and reporting of QHSE on construction sites and operations of the facilities. IGT provides related health, safety, and environment (HSE) training to all supervisors, subcontractors, site engineers, new employees, and temporary workers. Regular HSE meetings are held with regional field staff to ensure compliance, as well as random HSE site inspections in all regions, and all staff are provided regular updates on the need to comply with HSE requirements. Office safety measures include fire prevention and emergency procedures, good housekeeping, electrical awareness and rules, and procedures and instructions for access and exit at working place. Accidents are reported by the immediate supervisor to his or her manager within 24 hours and recorded in the incident report form. A pocket card is given to each landlord with a phone number for lodging grievances.

¹ A ground-based tower typically consists of a fenced compound occupying between 140–250 square meters of land, a steel lattice tower (32–70 meters high), a radio frequency panel antenna and microwave antenna dishes mounted on the tower, and switch gear and a diesel generator with a fuel tank set on concrete pads at the base of the tower.

² For each candidate tower site IGT applied the following setbacks and clearances: (i) site setback of 50 meters to religious structures and hospitals; (ii) environmental setback of 14 meters to lakes and rivers; and (iii) municipal setback to residences equivalent to 10% of the tower height from the infrastructure's outer edge to the property boundary.

C. Involuntary Resettlement and Indigenous Peoples

4. Involuntary resettlement and land acquisition impacts are not triggered as all sites for IGT's facilities will be on leased lands, and all negotiations for the leasing of private land are done on commercially acceptable terms. The consultations carried out during due diligence confirmed that landowners receive higher benefits by leasing their lands for a tower, as the rental returns were considerably higher than the returns from alternative land uses. IGT normally enters into a memorandum of understanding with the private landowner when the site has been selected as a candidate. Before the land is used, IGT and the land owners sign a lease agreement. Although Myanmar has various ethnic groups across the country, the construction and operation of the telecommunication towers are not expected to result in the transformation, encroachment, or degradation of indigenous community lands. Further, IGT's site selection criteria avoid lands with traditional or customary rights.

D. Other Social Dimensions

5. IGT's human resources policy and procedures contain nondiscrimination and equal opportunity conditions to avoid bias based on gender, health, disability, race or religion. They also include compensation, disciplinary, and grievance procedures for its employees. IGT requires its contractors to comply with national labor laws and prevent the use of underage labor by construction contractors and their subcontractors. The environmental and social compliance audit recommends the development of procedures to monitor the work practices of IGT and its contractors, which is consistent with requirements of ADB's Social Protection Strategy³ and the provisions of International Finance Corporation Performance Standards 2 on Labor and Working Conditions.

³ ADB. 2011. *Social Protection Strategy*. Manila