Environmental Assessment and Review Framework

January 2015

PAK: Power Distribution Enhancement Investment Program II

Prepared by the project preparatory consultant, on behalf of the distribution companies of the Government of Pakistan, for the Asian Development Bank.

CURRENCY EQUIVALENTS

(as of __ March 2015)

Currency unit	–	Pakistan rupee/s (Pre/PRs)
Pre1.00	=	$
$1.00	=	Prs

ABBREVIATIONS

ADB	—	Asian Development Bank
SC	—	supervision consultants
EA	—	environmental assessment
EARF	—	environmental assessment and review framework
EIA	—	environmental impact assessment
EMP	—	environmental management plan
GFP	—	grievance focal point
IEE	—	initial environmental examination
MFF	—	multitranche financial facility
NGO	—	non-government organization
PMU	—	project management unit
SPS	—	Safeguard Policy Statement

NOTES

(i) The fiscal year (FY) of the Government of the Islamic Republic of Pakistan and its agencies ends on 30 June. “FY” before a calendar year denotes the year in which the fiscal year ends, e.g., FY2015 ends on 30 June 2015.

(ii) “$” refers to US dollars

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I. INTRODUCTION

1. **Investment program.** The Government of Pakistan has initiated major reforms to eliminate significant and long-term problems within the power sector. One important issue is the need to increase the financial viability and reliability of the power distribution system, which would lead to cost savings for distribution companies (DISCOs) and power consumers, and improve the consumers' quality of life and the overall economic activity.

2. In this context, the government is starting a large-scale program to introduce advanced metering infrastructure (AMI) to DISCOs. The investment program will be implemented in different phases through the Asian Development Bank's (ADB) multitranche financing facility, with the goal of achieving significant AMI coverage across Pakistan´s major cities and hubs of industrial activity. The investment program will be sufficient to cover the costs of purchasing and installing the smart metering technologies and the necessary supporting infrastructure. The executing agencies for each of the subprojects will be Islamabad Electric Supply Company (IESCO), Lahore Electric Supply Company (LESCO) for Tranche 1; and other DISCOs in Peshawar, Quetta, Faisalabad, Gujranwala, Multan, and Hyderabad for subsequent tranches.

3. **Purpose of the environmental assessment and review framework.** As it does not entail civil works, the investment program, including Tranche 1, is expected to have minimal environmental impacts. Following the ADB's Safeguards Policy Statement (2009) (SPS 2009), this environmental assessment and review framework (EARF) was prepared to mitigate any impacts, should they arise, for future subprojects. The EARF outlines the environmental policy, procedures and institutional requirements to prepare subsequent subprojects, and ensure that any environmental impacts are mitigated to acceptable levels. The DISCOs will be responsible for preparing and implementing all ADB and national safeguards requirements. All such requirements must be submitted to ADB for review and approval prior to finalizing contracts or commencing Advanced Metering Infrastructure (AMI) installation.

II. Assessment of Legal Framework and Institutional Capacity

4. All projects that may be undertaken as part of the Power Distribution Enhancement Investment Program 2 will be screened, classified, and assessed based on Pakistan's environmental, health and safety legislation, and ADB's **S**afeguard **P**olicy Statement (SPS) 2009.

A. Pakistan's Environmental Legislation Requirements

5. After the 18th constitutional amendment, "Environment" has become the provincial subject. Provinces have enacted their individual environmental protection laws that include environmental and health and safety legislation. Provincial and federal environmental protection agencies (EPAs) have specific powers to approve initial environmental examinations (IEEs) and environmental impact assessments (EIAs) for development projects in their respective regions, and implement IEE and EIA regulations and procedures. To facilitate the IEE/EIA preparation process, the Federal Ministry of Climate Change provides general guidelines on preparing environmental assessment reports.

6. The Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations (2000) categorize

development projects into two schedules according to their potential environmental impacts. Projects that have reasonably foreseeable impacts (Schedule I) are required to have IEEs. Projects that have more adverse environmental impact (Schedule II) are required to have EIAs. The environmental assessment reports are filed with the provincial EPA for approval prior to project construction. Expansion and alteration of facilities within existing infrastructure have to be disclosed.

B. ADB Safeguard Policy Statement (2009) Requirement

7. The SPS 2009 consists of three operational policies on environment, indigenous peoples, and involuntary resettlement. This policy provides the scope, triggers, and principles to avoid, minimize, or mitigate adverse environmental and social impacts, including protecting the rights of those likely to be affected marginalized by the development process.

8. The environmental requirements of SPS 2009 aim to ensure project environmental soundness and sustainability, integrate environmental considerations into the project decision-making process. The principal objective is to conduct an environmental assessment for each proposed project to identify potential impacts, and then mitigate the negative impacts. The proposed mitigation measures, monitoring and reporting requirements, institutional arrangements, schedules, cost estimates, and performance indicators are documented in the environmental assessment report.

9. Each subproject is first categorized through a Rapid Environmental Assessment (REA) Checklist (Appendix 1) that focuses on the most significant issues. According to the findings of the REA checklist, the project will be categorized as A, B, or C. The definitions and reporting requirements of the environmental categories are summarized below.

Table 1: ADB Environmental Categories

Category	Project Impact	Reporting Requirement
A	A proposed project is classified as category A if it is likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the sites or facilities subject to physical works.	environmental impact assessment (EIA)
B	A proposed project is classified as category B if its potential adverse environmental impacts are less adverse than those of category A projects. These impacts are site-specific, few if any of them are irreversible, and in most cases mitigation measures can be designed more readily than for category A projects	initial environmental examination (IEE)
C	A proposed project is classified as category C if it is likely to have minimal or no adverse environmental impacts.	No environmental assessment is required although environmental implications need to be reviewed.

10. For a category B project which requires an IEE, at least one public consultation will be conducted with the local community and potentially affected people. The IEE will be approved by ADB and the Punjab/Pakistan EPA before commencing detailed design, and the IEE results

will be communicated to the local community before commencing AMI installation.

C. Environmental Management Capacity of Distribution Companies

11. The PMUs in each DISCO under the ongoing MFF: Power Distribution Enhancement Investment Program[1] have functioning Environment and Social Cells. These Environment and Social Cells will continue to be responsible for environmental management during the AMI installation and operation phase of the investment program. Should subsequent tranches be categorized B for environment, then the project implementation consultant and contractor will also be required to have full-time environment specialists.

12. Each Environment and Social Cell has a Deputy Manager (Environment), and Assistant Manager (Environment). The Deputy Manager (Environment)'s tasks are: (i) coordinating and planning of activities of the Environment and Social Cell; (ii) overseeing implementation of environmental mitigation measures by the contractor; (iii) documenting implementation of the EMP (and IEE for category B projects), and regularly reporting to ADB and the EPA; (iv) preparing training materials, and conducting training programs; and (v) maintaining interface with other line departments and stakeholders. For category B projects, the Deputy Manager (Environment) also (i) provides appropriate environmental advice and solutions to the Environment Specialist of the project implementation consultant and contractors, and (ii) prepares and submits bi-annual environmental monitoring reports to ADB.

III. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES OF THE INVESTMENT PROGRAM

A. Scope of Subprojects

13. The investment program will involve installation of AMI comprising (i) smart meters; and (ii) communication and data management, billing, and customer information systems. These activities will be carried out mainly within existing neighborhoods, and will not involve civil works.

B. Environmental Categorization

14. Following the initial environmental assessment (using the REA checklist), Tranche 1 falls into category C as defined by the SPS 2009. The impact on the landscape and physical environment is negligible and should not extend beyond the immediate meter replacement area. All the waste equipment will either be recycled within the NTDC system, dismantled and reused for parts, or disposed to designated areas within the DISCOs' facilities according to the health and safety policies of the National Transmission Despatch Company and Water and Power Development Authority. The scale of the AMI installation will cause no disturbance to any environmental receptors and meters removed will be installed at other location within the NTDC network (to other localities within the city).

C. Potential Environmental Impacts and Mitigation Measures

15. Some environmental impacts described in this section may arise under the subprojects in Tranche 1 and future tranches. If so, then the corresponding mitigation measures should be

[1] ADB. 2008. *Multitranche Financing Facility for the Power Distribution Enhancement Investment Program.* Manila.

implemented as part of the Environmental Management Plan (EMP) of the investment program, or IEE (in the case of category B subprojects).

16. **Soil erosion and dust emissions.** Earthworks and small civil works, if required, can contribute to dust emissions. These activities may involve vegetation clearing, land excavation, and machine operation, which, if not performed carefully, can result in soil erosion. Therefore, it will be necessary to introduce specific mitigation measures to counter the impacts of soil erosion and dust emissions.

17. **Ambient air quality.** Vehicular movement may cause deterioration of ambient air quality. Vehicles which are not in good condition may emit obnoxious discharges (CO, NO_2, SO_2, PM). Such discharges can be controlled through in time maintenance. The projects are expected to have short durations. Otherwise, if vehicular movement is required for longer project durations, then it will be necessary to perform regular monitoring during the AMI installation phase.

18. **Noise levels.** Operation of heavy equipment is not anticipated. However, should any noise-producing equipment be required, noise control measures to bring noise down to an acceptable level will need to be introduced as part of the installation stage mitigation measures. Background ambient noise levels should be measured, and then compared with typical values for noise generated by AMI installation equipment.

19. **Soil and groundwater quality.** The scale of installation activities would not result in any soil contamination by oil and chemical leaks.

20. **Drainage.** It is important to develop mitigation measures to ensure that excavation does not disrupt the natural drainage patterns of the area.

21. **Health and Safety:** health and safety risks to workers exist due to hah electrical equipment. Health and safety policy of WAPDA and NTDC should be strictly followed in this regard.

IV. ENVIRONMENTAL CRITERIA FOR SELECTING FUTURE SUBPROJECTS

22. Potential adverse environmental impacts of future subprojects can be avoided or minimized through carefully selecting the subproject location, design, and route. All subprojects will be screened for likely impacts using ADB's REA Checklist. The subprojects should:

(i) not disturb any cultural heritage areas designated by the government or international agencies, such as UNESCO, and shall avoid any monuments of cultural or historical importance;

(ii) not be located within or near the biodiversity core zone of any protected areas such as national parks, nature reserves, or wildlife sanctuaries;

(iii) avoid clearing of any existing forest resources, and if unavoidable, clearing will be minimized and compensatory planting included in the environmental management plan and budget for each subproject;

(iv) only involve activities that follow the government's laws and regulations, and will not involve ADB's list of prohibited activities;

(v) not use Polychlorinated biphenyl (PCB)-based oils in any activity, or otherwise, appropriate disposal plans will be made following national legal requirements; and

(vi) not likely to be classified as environment category A.

V. ENVIRONMENTAL POLICY FOR THE INVESTMENT PROGRAM

A. Environmental Mitigation Measures

23. The mitigation measures for environmental impacts, should they arise during the implementation of the subprojects under future tranches of the investment program, are to be addressed through the appropriate level of environmental assessment which will include an environmental management plan (EMP). The typical format of an EMP is summarized in appendix 2 as a sample EMP.

B. Responsibilities of Various Agencies

1. DISCOs

24. **Subproject selection.** The DISCOs, as the executing agencies of the subprojects under the investment program, will be solely responsible for implementing the entire environmental assessment and review procedures for selecting additional subprojects. This will include, but not be limited to, ensuring that the subproject selection criteria are strictly adhered to, and submitting the REA checklist to ADB.

25. **Requirements for category B projects.** In case any future subproject is categorized as B, then IEE will be prepared in a timely and adequate manner; environmental monitoring and reporting, and institutional requirements will be fully met; meaningful public consultations will be carried out with the affected local communities, and a grievance redress mechanism will be put in place. The detailed requirements for category B projects are in Appendix 3.

26. The Environment and Social Cells at the PMU at each DISCO (para. 12) will screen the subprojects of each subsequent tranche for environment impacts and will assign a category to each subproject. This category will be submitted to ADB at the time of processing of the subsequent tranches. In the event that subsequent tranches are category B for environment, the Environment and Social Cells will be responsible for environmental management during the AMI installation and operation phase of that tranche.

2. Project Implementation Consultants and Contractors

27. Should subsequent tranches be categorized B for environment, the project implementation consultant and contractor will also be required to have full-time environment specialists. The project implementation consultants will in that case then monitor implementation of EMPs and IEEs by the contractors, which will be reported to the DISCOs in their progress reports.

3. ADB

28. During the investment program, ADB will (i) review categorization and environmental

assessment reports as a basis for subproject approvals; (ii) publicly disclose the IEE (for category B subprojects); (iii) monitor the EMP implementation and due diligence as part of MFF reviews; (iv) provide assistance to DISCOs, if required, in carrying out its responsibilities and for building capacity for safeguard compliance.

29. As part of their monitoring actions, ADB will carry out the following:

(i) Conduct periodic site visits for projects with adverse environmental or social impacts.

(ii) Review and disclose on ADB website the bi-annual monitoring reports submitted by DISCOs to ensure that any adverse impacts and risks are mitigated as planned and as agreed with ADB.

(iii) Work with DISCOs to rectify to the extent possible any failures to comply with their safeguard commitments, as covenanted in the legal agreements, and exercise remedies to re-establish compliance as appropriate.

(iv) Prepare project completion reports that assesses whether the objective and desired outcomes of the EMPs have been achieved, taking into account the baseline conditions and the results of monitoring.

RAPID ENVIRONMENTAL ASSESSMENT (REA) 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 Environment and Safeguards Division (RSES) for endorsement by Director, RSES 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:

Sector Division:

Screening Questions	Yes	No	Remarks
A. Project Siting Is the Project area adjacent to or within any of the following environmentally sensitive areas?			
▪ Cultural heritage site			
▪ Protected Area			
▪ Wetland			
▪ Mangrove			
▪ Estuarine			
▪ Buffer zone of protected area			
▪ Special area for protecting biodiversity			
B. Potential Environmental Impacts Will the Project cause…			
▪ encroachment on historical/cultural areas, disfiguration of landscape and increased waste generation?			
▪ encroachment on precious ecosystem (e.g. sensitive or protected areas)?			

Screening Questions	Yes	No	Remarks
▪ alteration of surface water hydrology of waterways crossed by roads and resulting in increased sediment in streams affected by increased soil erosion at the construction site?			
▪ damage to sensitive coastal/marine habitats by construction of submarine cables?			
▪ deterioration of surface water quality due to silt runoff, sanitary wastes from worker-based camps and chemicals used in construction?			
▪ increased local air pollution due to rock crushing, cutting and filling?			
▪ risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during project construction and operation?			
▪ chemical pollution resulting from chemical clearing of vegetation for construction site?			
▪ noise and vibration due to blasting and other civil works?			
▪ dislocation or involuntary resettlement of people?			
▪ disproportionate impacts on the poor, women and children, Indigenous Peoples or other vulnerable groups?			
▪ social conflicts relating to inconveniences in living conditions where construction interferes with pre-existing roads?			
▪ hazardous driving conditions where construction interferes with pre-existing roads?			
▪ creation of temporary breeding habitats for vectors of disease such as mosquitoes and rodents?			
▪ dislocation and compulsory resettlement of people living in right-of-way of the power transmission lines?			
▪ environmental disturbances associated with the maintenance of lines (e.g. routine control of vegetative height under the lines)?			
▪ facilitation of access to protected areas in case corridors traverse protected areas?			

Screening Questions	Yes	No	Remarks
▪ disturbances (e.g. noise and chemical pollutants) if herbicides are used to control vegetative height?			
▪ large population influx during project construction and operation that cause increased burden on social infrastructure and services (such as water supply and sanitation systems)?			
▪ social conflicts if workers from other regions or countries are hired?			
▪ poor sanitation and solid waste disposal in construction camps and work sites, and possible transmission of communicable diseases from workers to local populations?			
▪ risks to community safety associated with maintenance of lines and related facilities?			
▪ community health hazards due to electromagnetic fields, land subsidence, lowered groundwater table, and salinization?			
▪ 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 construction and operation?			
▪ community safety risks due to both accidental and natural hazards, especially where the structural elements or components of the project (e.g., high voltage wires, and transmission towers and lines) 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?			

A Checklist for Preliminary Climate Risk Screening

Country/Project Title:
Sector :
Subsector:
Division/Department:

Screening Questions		Score	Remarks[2]
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?		
	Would the project design (e.g. the clearance for bridges) need to consider any hydro-meteorological parameters (e.g., sea-level, peak river flow, reliable water level, peak wind speed etc)?		
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)?		
	Would weather, current and likely future climate conditions, and related extreme events likely affect the maintenance (scheduling and cost) of project output(s) ?		
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?		

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 low risk 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 medium risk 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 high risk project.

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

Other Comments:_____

Prepared by: _____

[2] 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.

ENVIRONMENTAL MANAGEMENT PLAN (SAMPLE)

Project Activities	Type of Impact	Severity & Frequency	Mitigation Measures	Institutional Responsibility	
				Implementation	Supervision
PRE-CONSTRUCTION PHASE					
Cultural properties	Social Impacts Impact on Mosques, madrasas, graveyards and adjacent sites	Medium All along the project corridor	• Construction activities avoid any interference with sensitive sites. • In case of unavoidable interference prior notification and consultation needed for consensus on options e.g relocation/rebuilding) or any other form of agreed compensation	The Executing Agency in bid documents for contractor, Environment Specialist	Executing Agency / DD E&S
Planning site activities	Construction causes danger to workers, locals	Low During construction	• Prepare health and safety plan	Executing Agency Contractor	Executing Agency Contractor DD E&S
Flora	Botanical Impacts Cutting of trees of different species	Medium During Construction	• The sufficient amount of planning shall be done. • Effort should be made to save as many trees as possible even if they are young or poll stage. Proper irrigation and maintenance of plants will be done. .	Contractor	The Executing Agency / DD E&S
CONSTRUCTION					
Health and safety at work place	Health risks if work conditions provide unsafe and/or unfavorable work conditions	High During Construction	• Obligatory insurance against accidents to work laborers • Provide basic medical training to specified work staff, and basic medical services and supplies to workers • Work safety measures and good workmanship practices to ensure provision of safety harness, electrical safety Gloves and shoes	Contractor	The Executing Agency / DD E&S

Project Activities	Type of Impact	Severity & Frequency	Mitigation Measures	Institutional Responsibility	
				Implementation	Supervision
Excavation of earth	Aesthetics, interrupting pathways loss of topsoil, Soil Erosion, loss of vegetation and habitat	Medium During Excavation	• Contractor needs to obtain approval from THE EXECUTING AGENCY for excavation and for plan of rehabilitating site after excavation • Take off top soil, & reintroduce after end of work • As applicable and needed, plantation of grasses and shrubs will be done such as the slope drains, etc. Soil erosion along the road be visually checked as in EMP	Contractor	The Executing Agency / DD E&S
Clearing site	Damage not restored on departure	High During construction	• Supervise and enforce closure plan. Monitor All excavated spaces would be filled back after laying off the cables	Contractor	The Executing Agency DD E&S Contractor
Vehicular movement and operation of machineries	Emission from construction, vehicles and machinery, causing public health risks, nuisance and other impacts on the bio-physical environment	Medium Dust and other emissions	• All vehicles, equipment and machinery used for construction be regularly maintained to ensure that the pollution emission levels conform to the NEQS in case of longer construction activity (one month or more) • Air quality parameters be monitored at determined sites and schedule determined by the executing agency in case the construction/installation time is more than 3 days Incorporate design features enabling continuation of traffic flow in neighborhood	Contractor EPA Approved Labs	The Executing Agency, DD E&S Contractor
Social Disturbance	Working in neighborhood, invasion of privacy of locals	Low	• Contractors should restrict workers movement to the subproject only Adhere to ethical behavior	Contractor	The Executing Agency, Environment Specialist, Contractor

REQUIREMENTS FOR SUBPROJECTS WITH ENVIRONMENTAL CATEGORY B

A. Project Preparation and Pre-Implementation

1. Prior to submitting the subproject for financing, the distribution company (DISCO) will:

(i) Prepare the terms of reference for environmental consultants should they be required to conduct environmental assessment, prepare environmental assessment, and initial environmental examination (IEE) report including an environmental management plan (EMP).

(ii) Ensure that adequate public consultation has been undertaken with affected groups and local stakeholders, and that the result of these consultations is incorporated into the IEE.

(iii) Review the environmental assessment and submit the IEE, and EMP documents to ADB and the relevant Pakistan Environmental Protection Agency (EPA).

2. Prior to commencing Advanced Metering Infrastructure (AMI) installation, the DISCO will:

(i) Submit the IEE for regulatory approval of the relevant provincial EPA, and obtain approval, e.g., environmental clearance, Non-Objection Certificate, forest clearance, and water board clearance as per the Government's regulatory requirements, and submit them promptly to the Asian Development Bank.

(ii) Ensure that the required mitigation measures during implementation of the EMP are included in the bidding document of the subproject, and that all bidders have access to the IEE and EMP.

(iii) Set up a grievance redress mechanism (GRM, see section B).

B. Grievance Redress Mechanism

3. **GRM establishment.** Prior to the contractor's mobilization at the site, the DISCO will facilitate the establishment of a grievance redress committee (GRC) with grievance focal points (GFPs) at subproject locations. The GRC and GFPs will attend to the grievances of the local communities and affected parties as necessary.

4. The GRC will comprise representatives from local authorities, affected parties, and other well-reputed persons as mutually agreed with the local authorities and affected persons. It will also comprise the environment specialists of the contractor, project implementation consultant (PIC), and DISCO's project management unit (PMU). The role of the GRC is to address the Project-related grievances of the affected parties that were not resolved satisfactorily during the initial stages of the GRM.

5. **GFPs.** The DISCO will assist affected communities in identifying local representatives to act as their GFPs. The GFPs will be responsible for (i) representing the community in formal meetings with the contractor, PIC, and the local community s/he represents; and (ii) communicating community members' grievances and concerns to the contractor. The number of GFPs for each project will depend on the number and distribution of affected communities.

6. **Public consultation meeting.** A pre-mobilization public consultation meeting will be convened by the DISCO Deputy Manager (Environment and Social) with the GFPs, contractor, PMU, and PIC, and other interested parties (e.g. district-level representatives, NGOs) to:

(i) Introduce the key personnel of each stakeholder, including their roles and responsibilities.

(ii) Clarify the GRM's, including routine (proactive) public relations activities proposed by the contractor, PIC, and PMU to ensure the communities are continually advised of project progress and associated constraints throughout project implementation.

(iii) Identify the GRC members.

(iv) Present project information of immediate concern to the communities by the contractor (timing and location of specific AMI installation activities, design issues, access constraints etc.) This will include a brief summary of the EMP's purpose and implementation arrangements.

(v) Elicit and address the community's immediate concerns based on the information provided above.

7. **GRM implementation.** Following the pre-mobilization public consultation meeting, environmental complaints associated with the AMI installation activity will be routinely handled through the GRM as follows:

(i) Individuals will lodge their environmental complaint/grievance with their respective community's nominated GFP.

(ii) The GFP will bring the individual's complaint to the contractor's attention.

(iii) The contractor will record the complaint in the onsite Environmental Complaints Register (ECR) in the GFP's presence.

(iv) The GFP will have the complaint resolved with the contractor. If the Contractor does not resolve the complaint within one week, then the GFP will bring the complaint to the DISCO's Environment Specialist's attention who will coordinate with the Contractor in resolving the issue.

(v) If the complaint is not resolved within two weeks, the GFP will present the complaint to the GRC. The complaint should be resolved within two weeks, and the outcome will be reported back to the community. The Contractor will then record the complaint as resolved, and closed in the ECR.

(vi) Should the complaint not be resolved through the GRC, the issue will be adjudicated through local legal processes.

8. In parallel to the ECR, each GFP will maintain a record of the complaints received, and follow up on their rapid resolution. The DISCO will keep track of the status of all complaints through the contractor's monthly environmental monitoring reports, and ensure that they are resolved on time.