

Environmental Assessment and Review Framework

Project Number: 40156-033
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India: Sustainable Coastal Protection and Management Investment Program – Tranche 2 Karnataka

Prepared by the Project Management Unit of the Sustainable Coastal Protection and Management Investment Program, Public Works, Ports & Inland Water Transport Department, Karnataka for the Asian Development Bank (ADB).

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CURRENCY EQUIVALENTS

(as of 20 May 2016)

Currency Unit	–	Indian rupee/rupees (Re/Rs)
Rs1.00	=	\$ 0.015033
\$1.00	=	Rs66.5224

ABBREVIATIONS

ADB	Asian Development Bank
CPCB	Central Pollution Control Board
CRZ	Coastal Regulation Zone
CWC	Central Water Commission
EIA	environmental impact assessment
EMP	environmental management plan
GOI	Government of India
IEE	initial environmental examinations
MFF	multitranche financing facility
MOEFCC	Ministry of Environment, Forests and Climate Change
MOWR	Ministry of Water Resources
NCA	National Coordinating Agency
NGO	non-governmental organization
PMU	program management unit
SEA	State Executing Agency
WHO	World Health Organization

NOTES

- (i) The fiscal year (FY) of the Government of India ends on 31 March. FY before a calendar year denotes the year in which the fiscal year ends, e.g., FY2016 ends on 31 March 2016.
- (ii) In this report, "\$" refers to US dollars.

ENVIRONMENTAL ASSESSMENT AND REVIEW FRAMEWORK (EARF)

A. Background and Overview

1. The Government of Karnataka has committed to implement the Sustainable Coastal Protection and Management Investment Program (SCPMIP) that addresses immediate coastal protection needs and coastal instability through implementation of economically viable protection works using environmentally and socially appropriate solutions. The investment program has been funded through ADB's multi-tranche financing facility (MFF). Project 1 of the MFF loan of \$198,064,000 was approved in September 2010. The Ministry of Water Resources through the Central Water Commission is the national coordinating agency and responsible for the project to the National Government. The Karnataka Public Works, Ports & Inland Water Transport Department (PWPIWTD) is the executing agency.

2. As part of the MFF preparation process, the ADB Safeguard Policy Statement, 2009 (SPS) requires that an environmental assessment review framework (EARF) be prepared to assist the project address potential environmental impacts. The EARF is intended to guide the preparation of the environmental assessment study either the environmental impact assessment (EIA) or initial environmental examination (IEE) for any activity funded by this particular MFF. This framework includes the following guidance: (i) to screen and categorize a project based on its potential environmental impacts; (ii) to carry out prediction of impacts and to value the significance of the impacts; (iii) to identify potential mitigation measures based on environmental management principles; (iv) to conduct public consultation; (v) to establish grievance redress mechanism; and (vi) to prepare an environmental management plan (EMP) including monitoring plan.

3. The EARF for the MFF Sustainable Coastal Protection and Management Investment Program was prepared as part of Project 1 and approved in October 2010. The EARF was prepared to comply with the Government of India EIA requirement and the ADB the SPS 2009. However, in January 2011, the Government of India adopted the new coastal regulation zone (CRZ) to replace 1991 CRZ. The EARF has been updated during preparation of Project 2 to include the government notification on CRZ adopted in January 2011. All the environmental assessments prepared for this MFF will need to comply with the CRZ 2011.

B. Brief Description of Project 2.

4. During project 2 preparations, and socioeconomic surveys conducted (as part of the social impact due diligence), it was confirmed that that no indigenous peoples (IPs) will be affected by project 2. The features of subprojects to be undertaken in project 2 are briefly described below. A detailed description is attached in Annex 1.

Table 1: Brief Description of Project 2

No.	Sub Project	Protection Length (Km)	Revetment (km)	Groynes (nr)	T Groynes (nr)	Off shore reef (nr)	Planting (ha)	Sand (m ³)	Total rock (m ³)
Coastal Protection Sub Projects									
1	Someshwara	2	2	-	-	-	-	29,870	
2	Yermal Thenka	4.5	4.5	-	-	-	-	-	230,329
3	Udyavara	4.5	-	35	-	-	-	720,000	121,800
4	Kodi Bengre	5	4.5	-	-	-	-	-	207,251
5	Maravanthe	4.5	-	15	9	-	-	225,000	146,808
6	Murudeshwara	2	-	-	-	1	0.45	90,000	10,020
Community Protection Sub Projects Stage 1									
1	Kodi Kanyana	1.5	-	-	-	-	0.32	-	-
2	Pavinakurve	1.5	-	-	-	-	0.65	-	-
Community Protection Sub Projects Stage 2									
1	Location to be decided	30	-	-	-	-	180	800,000	-

C. India's Environmental Assessment and Review Procedures

5. The Environmental Protection Act, 1986 (EPA) is the umbrella legislation providing for protection of the environment in the country. The EIA Notification, 1994 and various amendments thereto have been notified under this act. The Ministry of Environment, Forests and Climate Change (MOEFCC) is responsible for protection and management of the environment and has enacted new notification under the Environmental Protection Act, 1986 related to environmental clearance of development projects with effect from September 14, 2006. The MOEFCC, the Central Pollution Control Board (CPCB) and State Pollution Control Boards (SPCB) constitute the regulatory and administrative core of environmental management. Since 1991 this has been strengthened by establishment of the State Coastal Zone Management Authorities. Other central ministries and state level agencies support the MOEFCC with regard to relevant subject matters. The EIA Notification of 2006 provides a schedule of development projects that require EC prior to start of construction works; the schedule places projects into two categories (A and B) based on spatial extent of potential impacts and potential impacts on human health and natural and man-made resources. All projects in Category A require an environmental clearance from MOEFCC. All projects in Category B require EC from the State/Union territory EIA Authority.

6. Applications for Category 'B' projects are screened to determine whether or not the project or activity requires further environmental studies for preparation of an EIA for its appraisal prior to granting environmental clearance, depending up on the nature and location specificity of the project; the projects requiring an EIA report are termed Category 'B1' and remaining projects are termed Category 'B2' and do not require an EIA report.

7. In order to protect the fragile coastal zone of the country from degradation, Government of India introduced a regulatory regime of the coastal zone through the CRZ Notification in 1991. The main purpose of this notification is to control and minimize environmental damage to coastal stretches including estuaries and backwaters. All coastal states of India were bound to formulate coastal zone management (CZM) plans classifying coastal stretches as coastal regulation zones, based on the nature of existing ecosystems and/or development. Areas of particular concern to this project are CRZ intertidal zones and the area above high tide to 200 m inshore. Tranche 1 sub-project designs complied with CRZ regulations 1991. If projects are either below the low tide line or part of a greater shoreline protection and management scheme then activities are deemed permissible in reference to certain notifications.

8. S.O.19 (E) CRZ Notification 6th Jan 2011- This notification repeals the 1991 CRZ notification. The 2011 notification adjusts the definitions of the CRZ, and includes the explanation on prohibited activities to be undertaken in the coastal zone/ areas. The notification grants the powers for implementing the provision of the CRZ requirements to the State Coastal Zone Management Authorities (SCZMA).

9. The Water (Prevention and Control of Pollution) Act, 1974 resulted in establishment of CPCB and SPCB whose responsibilities include managing water quality and effluent standards, as well as monitoring water quality, prosecuting offenders and issuing licenses for construction and operation of development projects requiring water as a resource. The Air (Prevention and Control of Pollution) Act, 1981, empowers SPCBs to enforce air quality standards set by CPCB. During the construction phase of the project, construction activities may require consent from the relative state government pursuant to the Water (Prevention and Control of pollution) Act of 1974, The Water Cess Act of 1977 and Air (Prevention and Control of Pollution) Act of 1981. This consent will be taken by the construction contractor and would be applicable to all sub projects of this loan program. The Wildlife (Protection) Act, 1972 has allowed the government to establish National Parks and Sanctuaries to protect and conserve flora and fauna of each state. The act will be applicable to this project if the command area of any sub project encroaches on any National Park or Sanctuary or houses habitats of wild animals. In 1988, the Indian Motor Vehicles Act empowered the State Transport Authority to enforce standards for vehicular pollution and prevention control. In August 1997, the Pollution Under Control Certificate (PUC) program was launched to crackdown on vehicular emissions in the States. All vehicles used in construction of subprojects will have to comply with the PUC norms set down under this act.

D. Specific Procedures to be used for Subprojects under the MFF Loan

1. Responsibilities and Authorities

10. The executing agency will be responsible for preparing future subprojects including environmental assessment reports and implementing EMPs for the subprojects as outlined in this framework. The executing agency will be responsible for submitting these to ADB for review and approval prior to commencement of work/finalization of contracts. In the absence of a policy consistent with ADB's Policy on Environment, this framework and environmental management procedural guidelines shall apply to all subprojects under the loan so as to ensure that the

environmental issues are appropriately addressed and mitigated to acceptable levels. A central project management unit (PMU) will be set up and will be responsible for overall implementation of the project including the EMP. Ministry of Environment and Forests (MOEFCC) and appropriate state government agencies, and coastal management committees where they exist, will review and approve EIAs/IEEs and EMPs. EIAs/IEEs and EMPs and associated supplementary and monitoring reports will be submitted to ADB for review and approval.

2. Environmental Criteria of Subproject Selection

11. The following environmental criteria for subproject selection will apply during implementation of the subprojects: (i) there should not be any disturbance to residents in areas surrounding the subproject sites – where there are inhabitants, no long-term effects should prevail; (ii) subprojects should have no or minimal impacts on the natural coastal dynamics; any impacts should be properly assessed through high quality numerical modeling. No impact should be seen on the local water supply; (iii) subprojects will have no direct or indirect long-term effect on ecologically sensitive areas such as national parks, wildlife sanctuaries, marine reserves, or areas of historical or cultural importance; (iv) there will be no damage to internationally important areas of interest; and (v) subproject sites shall not be altered in aesthetic value of coastal landscape.

12. During implementation of the MFF, any activity that is not listed as part of the defined subprojects but will be funded by the MFF, will be screened to determine its environmental requirements. The environmental requirement, if any, will be incorporated into the bidding and contract documents.

3. Procedures for Environmental Assessment of Subprojects

13. The environmental assessment (EA) of subprojects must fulfill requirements of ADB, as described in ADB's SPS and the Government of India. At an early stage of subproject preparation, potential direct, indirect, cumulative and induced environmental impacts on and risks to physical, biological, socioeconomic, and physical cultural resources will be identified and their significance and scope determined, in consultation with stakeholders, including affected people and concerned NGOs. Subprojects will be screened to determine whether they should be classified as ADB category A, or B or C. The attached screening checklist (Annex 2) will be used to identify environmental categorization. Depending on the significance of project impacts and risks, the assessment may comprise a full-scale EIA for category A projects, or an IEE or equivalent process for category B projects, category C projects will not require any environmental assessment document. Initial information also will be used to guide preparation of final designs/plans/solutions and scope, methodology and terms-of-reference for EIA/IEE studies.

a. Preparation of EIAs and IEEs

14. The EIA/IEE studies will follow ADB's SPS. Documentation required for the government approval includes: (i) a document detailing the project (including designs, processes, methods, and costs, supported by plans, maps, etc.); (ii) a document detailing the environmental impact; and (iii) a cover letter seeking environmental clearance. The letter and requisite documents would be sent to the SEA responsible for each subproject, who will submit these to the State Environment Agencies for review and clearance. The State Environment Agencies would submit the documentation to the MOEFCC. All environmental assessment documents must be sent to ADB for review and approval.

15. The EIA/IEE will consider all potential impacts and risks of the project on physical, biological, socioeconomic (occupational health and safety, community health and safety, vulnerable groups and gender issues, and impacts on livelihoods through environmental media) and physical cultural resources in an integrated way. Impacts and risks will be analyzed in the context of the project's area of influence, which encompasses: (i) the primary project site(s) and related facilities (ii) associated facilities that are not funded as part of the project; (iii) areas and communities potentially affected by cumulative impacts; and (iv) areas and communities potentially affected by impacts from unplanned but predictable developments caused by the project. Environmental impacts and risks will also be analyzed for all relevant stages of the project cycle, including preconstruction, construction, operations, decommissioning, and post closure activities such as rehabilitation or restoration. The assessment will identify potential trans-boundary effects, such as air pollution, increased use or contamination of international waterways, as well as global impacts, such as emission of greenhouse gases and impacts on endangered species and habitats. The environmental assessment will examine whether particular individuals and groups may be differentially or disproportionately affected by the project's potential adverse environmental impacts because of their disadvantaged or vulnerable status, in particular, the poor, women and children, and Indigenous Peoples. Qualified and experienced experts will be used to prepare the environmental assessment and the EMP.

16. Where unanticipated environmental impacts become apparent during project implementation, the executing agency will 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 those impacts.

b. Environmental Planning and Management

17. Future subproject EMPs will be prepared by consultants supporting the executing agency in following ADB's SPS. Each EMP will include the proposed mitigation measures, environmental monitoring and reporting requirements, emergency response procedures, related institutional or organizational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators. If some residual impacts are likely to remain significant after mitigation, the EMP will also include appropriate compensatory measures (offset) that aim to ensure that the project does not cause significant net degradation of the environment. The EMP will define expected outcomes as measurable events to the extent possible and will include performance indicators or targets that can be tracked over defined periods. It will be responsive to changes in project design, such as a major change in project location, or in technology, unforeseen events, and monitoring results. The EMP will incorporate pollution prevention and control measures consistent with international good practice, as reflected in internationally recognized standards such as the World Bank Group's *Environment, Health and Safety Guidelines*, measures to provide workers with a safe and healthy working environment, and preventative measures and plans to address risks to and potential impacts on the safety of affected communities.

c. Information Disclosure

18. The executing agency will submit to ADB documents for disclosure on ADB's website pursuant to the ADB's SPS: (i) a draft EIA (including the draft EMP), where applicable; (ii) the final EIA/IEE; (iii) a new or updated EIA/IEE and corrective action plan prepared during project implementation, if any; and (iv) the environmental monitoring reports. The PMU will provide relevant environmental information, including information from these 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 appropriate communication methods will be used.

d. Consultation, Participation and Grievance Redress

19. The executing agency will carry out meaningful consultation with affected people and other concerned stakeholders, including civil society, and facilitate their informed participation. The consultation process will (i) begin early in the project preparation stage and be carried out throughout the project cycle; (ii) provide timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) be undertaken in an atmosphere free of intimidation or coercion; (iv) be gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enable incorporation of all relevant views of affected people and other stakeholders into decision making. The consultation process and its results will be documented and reflected in the executing agency reports. The executing agency will establish a mechanism to receive and facilitate resolution of affected peoples' concerns, complaints, and grievances about the project's environmental performance.

e. Monitoring and Reporting

20. The PMU will monitor and measure the progress of implementation of the EMP. In addition to recording information to track performance, the PMU will undertake inspections to verify compliance with the EMP and progress toward the expected outcomes. This activity will include monitoring of: (i) compliance with conditions stipulated by State Governments and the Government of India, in consent to construction contractors; (ii) compliance with conditions obtained from MOEFCC; (iii) compliance of environmental management plans prepared as part of EIAs/IEEs; and (iv) good environmental practice and standards at an international level. The PMU will document monitoring results, identify necessary corrective actions, and reflect them in a corrective action plan, and will implement these corrective actions and follow up on these actions to ensure their effectiveness. The PMU will prepare periodic monitoring reports that describe progress with implementation of the EMP and any compliance issues and corrective actions. The PMU will submit at least semiannual monitoring reports during construction for subprojects likely to have significant adverse environmental impacts. Such periodic reports will be posted in a location accessible to the public. Project budgets will reflect the costs of monitoring and reporting requirements. The relevant details of the required monitoring and reporting are described in the project administration manual (PAM).

E. Confirmation that Environmental Assessment and Review Procedures Conforms to ADB's Environmental and Social Safeguard Policies

21. These procedures cover the responsibilities, process and resources required for EIA/IEE preparation in respect of subprojects for shoreline protection and coastal management. The procedures satisfy the general objectives of EIAs/IEEs under ADB requirements, and also comply with the government's requirements.

F. Staffing Requirements and Budget

22. In general, staffing of the PMU includes representatives from the EAs and from State Environment Agencies as well as representatives from State CRZ committees. The PMU will include representatives from the Office of Panchayats, Local District Council and the Panchayat who will be responsible for establishment of the shoreline management organizations. The PMU

will also directly provide a support budget to engage specialist and survey staff from National Institutes or from the private sector, to provide technical support and field surveys as required. In addition the PMU will determine the needs of its environmental staff throughout the implementation to enable the PMU to competently address any environmental issues that may be raised during project implementation.

ANNEX 1: SUMMARY OF SUBPROJECTS UNDER PROJECT 2

1. Coastal Protection Subprojects have been planned and designed to address the issues of medium to severe coastal erosion by means of civil construction at six locations, viz. Someshwara, Yermal Thenka, Udyavara, Kodi Bengre, Maravanthe, and Murudeshwara.

- (i) Someshwara: The project site is located in Dakshina Kannada District, south of Mangalore. The proposed coastal protection scheme at Someshwara site is revetment using geotextile containers filled with sand, for a length of about 2 kilometers (km). The proposed scheme provides protection to the communities and infrastructure adjacent to the shoreline. The estimated cost of the proposed scheme at Someshwara is \$4.7 million
- (ii) Yermal Thenka: The project site is located in Udupi District. The proposed coastal protection scheme at Yermal Thenka is to rehabilitate the existing rock revetment for a length of 3.8 km and constructing new rock revetment for a length of 700 meters (m) using large size armour rocks. The proposed scheme provides protection to the existing fisheries road running parallel to the shoreline for a length of 4 km and also to protect the land from erosion. The total estimated cost of the proposed scheme at Yermal Thenka is \$11.6 million
- (iii) Udyavara: The project site is located in Udupi District. The project site is a long narrow spit, surrounded by sea on the west and river on the east. A 9-km fisheries road which runs along the spit that connects Malpe fishing harbour to the nearby villages is under constant threat from erosion. The proposed coastal protection scheme at Udyavara includes protecting a shoreline length of 5 km by providing 35 numbers of shore normal rock groynes spaced at an interval of 120 m and nourishing the beach with a total volume 720,000m³ of sand. The total estimated cost of the proposed scheme at Udyavara is \$14.6 million.
- (iv) Kodi Bengre: The project site is located in Udupi District. The project site is a long narrow spit, surrounded by sea on the west and river on the east. The spit, which is densely populated is under constant threat from erosion and wave flooding. The proposed coastal protection scheme at Kodi Bengre is to rehabilitate the existing rock revetment and constructing new rock revetment over a length of 4.5 km. The total estimated cost of the proposed scheme at Kodi Bengre is \$11.1 million.
- (v) Maravanthe: The project site is located in Udupi District. Maravanthe project site is surrounded by Arabian Sea on the west and Souparnika River on the east forming a narrow isthmus on which the National Highway 66 (NH-66) running that, connects Mumbai in the north to Kochi in Kerala towards the south. The proposed scheme involves protecting a shoreline length of 3.5kms by 15 numbers of shore normal groynes on south and northern ends of project site and 9numbers of T-groynes at middle section where NH-66 runs close to the sea and river. Sand redistribution is proposed to enhance the beach width at critical sections. The total estimated cost of the proposed scheme at Maravanthe is \$13.5 million.
- (vi) Murudeshwara: The project site is located in Uttara Kannada district. Murudeshwara is one of the prime tourist destinations within Karnataka state. The shore protection scheme here is a combination of offshore reef, sand nourishment of 900,00 m³ and dune stabilization by vetiver grass for northern stretch of 1.5 km. The main rational of this scheme is to protect the beach located on the leeside of the reef by reducing the wave energy, increasing the

beach width by sand nourishment. The total estimated cost of the proposed scheme at Murudeshwara is \$3.9 million.

2. In addition to the above subprojects, the Project 2 includes community protection that was planned to be implemented in 2 stages:

1. COMMUNITY PROTECTION SUB PROJECTS STAGE 1

3. Two community sub projects Kodi Kanyana and Pavinkurve have been planned designed under the Tranche 1 and will be implemented in 2016/2017.

- (i) Kodi Kanyana: The project site is located in Udupi District. Three-layered vegetation planting scheme along a 1.5 km stretch is proposed in order to reduce wave up rush into the cultivable lands located behind the proposed site and also to hold the beach. This scheme is proposed to protect a length of 1.5km stretch. Implementation and maintenance of this scheme is proposed to be carried out by involving local community. The total estimated cost of the proposed scheme at Kodi Kanyana is \$0.14 million
- (ii) Pavinakurve: The project site is located in Uttara Kannada district. The project area is divided into three sectors, where plantation scheme is proposed with a combination of different species of plants. This scheme is proposed to protect a length of 1.5 km stretch. Implementation and maintenance of this scheme is proposed to be carried out by involving local community. The total estimated cost of the proposed scheme at Pavinakurve is **\$ 0.15 million.**

2. COMMUNITY PROTECTION SUB PROJECTS STAGE 2

4. The Stage 2 community protection sub projects will involve dune construction with a nourishment of about 800,000m³sand, planting for an area of 180 ha. This will cover approximately 30km of shoreline. Minor infrastructure facilities in the form of access and water drainage will be provided wherever appropriate. The potential sites will be identified and the designs will be finalized by the project 2 consultants. The Stage 2 community protection sub-projects will incorporate the design guidelines to be prepared by the Climate Resilient Coastal Protection Project (CRCPMP) project. The total estimated cost of the proposed scheme under community protection sub project stage 2 is \$10.3 million.

ANNEX 2

Rapid Environmental Assessment (REA) Checklist

Brief Description of the Sub-project:

Location of sub-project

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			
▪ LEGALLY PROTECTED AREA (CORE ZONE OR BUFFER ZONE)			
▪ WETLAND			
▪ MANGROVE			
▪ ESTUARINE			
▪ SPECIAL AREA FOR PROTECTING BIODIVERSITY			
B. POTENTIAL ENVIRONMENTAL IMPACTS WILL THE PROJECT CAUSE...			
▪ impairment of historical/cultural areas; disfiguration of landscape or potential loss/damage to physical cultural resources?			
▪ disturbance to precious ecology (e.g. sensitive or protected areas)?			
▪ alteration of surface water hydrology of waterways resulting in increased sediment in streams affected by increased soil erosion at construction site?			
▪ deterioration of surface water quality due to silt runoff and sanitary wastes from worker-based camps and chemicals used in construction?			
▪ Increase turbidity and sunlight penetration as well as changes in sediment pattern and flows at dredging site?			
▪ Removal and disturbance of aquatic flora and fauna?			
▪ Alteration of bottom surface and modification to bathymetry, causing change in tidal bore, river circulation, species diversity, and salinity?			
▪ Change in sediment pattern and littoral drift that may cause beach/coastal erosion of neighboring areas			
▪ increased air pollution due to project construction and operation?			
▪ noise and vibration due to project construction or operation?			

Screening Questions	Yes	No	Remarks
▪ involuntary resettlement of people? (physical displacement and/or economic displacement)			
▪ disproportionate impacts on the poor, women and children, Indigenous Peoples or other vulnerable groups?			
▪ poor sanitation and solid waste disposal in construction camps and work sites, and possible transmission of communicable diseases (such as STI's and HIV/AIDS) from workers to local populations?			
▪ creation of temporary breeding habitats for diseases such as those transmitted by mosquitoes and rodents?			
▪ social conflicts if workers from other regions or countries are hired?			
▪ large population influx during project construction and operation that causes increased burden on social infrastructure and services (such as water supply and sanitation systems)?			
▪ risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during project construction and operation?			
▪ 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 causes, 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?			
▪ generation of solid waste and/or hazardous waste?			
▪ use of chemicals?			
▪ generation of wastewater during construction or operation?			

Based on information provided in this checklist, the assessment to categorize the project will be as follows:

Project will be categorized as A:

- if the project will have “YES” answer for any question in group A , and
- if the project will have “YES” answer for any question in group B, with no confirm mitigation measures

Project will be categorized as B:

- if the project will have “NO” answer for all question in group A, but have “YES” answer for any question with no confirm mitigation measures

Project will be categorized as C:

- If the project will have “NO” answer for both group A and group B questions.