



Ahmed Hassaan Zuhair <ahmed.hassaan@environment.gov.mv>

Fwd: ESSA's clearance comments for Maldives Clean Environment Project (P160739) - Safeguards Instruments-Implementation Stage ESMPs and Vandhoo ESIA

Mokshana Nerandika Wijeyeratne <mwijeyeratne@worldbank.org>

Mon, Jun 10, 2019 at 6:22 PM

To: "ahmed.hassaan@environment.gov.mv" <ahmed.hassaan@environment.gov.mv>

Cc: Susrutha Goonasekera <sgoonasekera@worldbank.org>, Karin Shepardson <kshepardson@worldbank.org>, Darshani De Silva <ddesilva4@worldbank.org>

Dear Hassan,

The Safeguards instruments have received conditional clearance and we will need to address the conditions and or provide further clarifications. On the Environment aspects I sense we will have to explain further as they have not reviewed the original ESIA and documents as we indicated so we will have to extract key sections and further clarify. Lets work on this in the field. Please discuss with Sus on next steps on the social comments.

Once these are addressed we only have to do further updates and then disclose. and we have to just make a submission for reference to the RSA office.

Best
Mokshana

Sent from my iPhone

Begin forwarded message:

From: Mokshana Nerandika Wijeyeratne <mwijeyeratne@worldbank.org>

Date: June 10, 2019 at 8:16:53 PM GMT+7

To: OPSOR ESSAT Review <opsoreassatreview@worldbank.org>

Cc: Maged Mahmoud Hamed <mhamed1@worldbank.org>, Paivi Koskinen-Lewis <pkoskinenlewis@worldbank.org>, Takeaki Sato <tsato@worldbank.org>, Roselind Rajan <rrijan@worldbank.org>, Charles Ankisiba <cankisiba@worldbank.org>, Aki Tsuda <atsuda@worldbank.org>, Karin Shepardson <kshepardson@worldbank.org>, James Orehmie Monday <jmonday@worldbank.org>, "Gaurav D. Joshi" <gjoshi1@worldbank.org>, Bandita Sijapati <bsijapati@worldbank.org>, Hocine Chalal <hchalal@worldbank.org>, Darshani De Silva <ddesilva4@worldbank.org>, Susrutha Goonasekera <sgoonasekera@worldbank.org>

Subject: Re: ESSA's clearance comments for Maldives Clean Environment Project (P160739) - Safeguards Instruments-Implementation Stage ESMPs and Vandhoo ESIA

Dear Maged and All,

Thank you. I will onward these to the client and advice accordingly.

Best Wishes,
Mokshana

Sent from my iPhone

On Jun 10, 2019, at 8:10 PM, OPSOR ESSAT Review <opsoreassatreview@worldbank.org> wrote:

Sent on behalf of Maged M. Hamed, Environment and Social Standards Adviser

Dear Mokshana,

The safeguard instruments are cleared subject to addressing the following comments:

Social

ESMP for the Proposed Construction and Operation of an Island Waste Management Centre in Hithaadhoo, Baa Atoll:

On the socio-economic profile, there have been some additions but the section does not give the reader much information about the general social aspects, as was requested by the comments. The previous comments also asked to clarify whether there are any waste pickers or squatters and the comments matrix has provided a response but this is not reflected in the document; please add this to the additional information.

On consultations, the annex now provides details of more inclusive consultations and the issues discussed, including the user fee; only item missing is the list of participants; please add this.

SMP for the Proposed Construction and Operation of an Island Waste Management Centre in Dhonfanu, Baa Atoll:

The comments of the first review were very similar to the one on Hithaadhoo; similarly, the comments above apply in this case as well given that these two documents are almost identical.

The annex with the additional information includes consultations with 29 people from the general community and outlines the issues discussed; only item missing is a list of participants; please add this.

ESMP for the Upgrading of Island Waste Management Centre in R. Ungoofaaru:

Again, the previous comments requested more information on socio-economic characteristics and some information has been added but this is quite limited.

On consultations, there has only been one consultation with the island council as was mentioned in the previous version. Justification for this seems to be the nature of the works, which is upgrading an existing facility. We recommend ensuring that the community is kept informed of the project and any works as well as the GRM.

Editorial note: Please remove the consultant's CV and certificates from the document before disclosure, these should not be in the Government's document.

ESIA of Upgrading of Infrastructure at Regional Waste Management Facility Zone II, Raa, Vandhoo:

Consultations: appendix 4 has a table showing the issues emerging from consultations and recommendations to address those as well as the responsible authority. Please clarify if these recommendations have been discussed with the relevant parties and as such are the recommendations going to be implemented in practice, since there is not budget or timeline? Chapter 6 mentions that recommendations were discussed with project unit, but no other parties? For instance, there is a recommendation to ensure women can access the island to gather coconut leaves and husks, which is important for maintaining their livelihood. Change in resource use is mentioned in table 27 as an impact during operations phase, and revised mitigation table 1 in appendix table 29 only proposes as mitigation that WAMCO collects and sells the resources to people instead of letting them come to the island to do the collection themselves – will this not lower their ability to earn an income when they need to pay for the resources? This activity should also be monitored to ensure livelihoods are not adversely affected by this arrangement.

Another livelihood issue is related to plots for boat building or the recommendation to develop such a yard; who will finance/construct this? According to the revised mitigation table 1 in appendix 1, it seems the two communities affected by this are not fully in agreement on where this yard should be located.

Workforce numbers estimates, can you please clarify if the workers are expected to be local or foreign?

Section on Socioeconomic baseline/characteristics only refers to previously conducted ESIA and SA – data/information could have been summarized here easily? Environmental characteristics seem rather detailed in comparison.

GRM: in general, a person does not have to exhaust all the tiers of the GRM to access the national judicial system.

Editorial note: Recommend removing consultants' CVs from the document.

Environment

(Numbers shown below are the original comments number.)

ESIA Upgrading of Vandhoo RWMF

9. Executive Summary: Please include ESMP table in Appendix 2

13. Turtle nesting site: The only information provided in the original EIA prepared in 2012 is the following paragraph: "The beach was reported (Turtle nesting reports, MOFA 2006) as a nesting location for hawksbill turtles (*Eretmochelys imbricata*), none observed. It is rumored that turtle eggs are still

collected and consumed in the Maldives, even if forbidden by law." Since the ESIA for upgrading of Vandhoo RWMF prepared in 2018 recognizes the existence of nesting pits all around the island, the proper analysis on the potential

impacts on turtle nesting and necessary mitigation measures should be included in ESIA documents. The information is currently missing.

14. Please explain the operational flow from receiving the wastes to waste disposal and how to

treat and discharge leachate from the landfill. This information is not found in the original EIA (NIRAS, 2012). The original EIA also states that "chemical treatment is mentioned, and the treated effluent is required to comply with 'Effluent Standards for Landfill in the US - MSW Landfills.'" The details of the chemical treatment process and applicable standards should be provided.

16. The potential livelihood impacts due to the loss of access to forest resources in Vandhoo: Two options are "recommended". However, mitigation measures should be determined and clearly proposed with costs, schedule and responsibility.

17. The contingency plan is NOT included in the Operations and Management Plan prepared by WAMCO in September 2018. The key requirements of a contingency plan should be explained in ESIA, and the more detailed plan should be prepared by the contractor and operator.

18. The adequate response was not provided. Please explain in the ESIA main text the owner of the Sea Turtle Management plan, and how to implement the plan and monitor implementation. Multiple parties such as MoFA, EPA, RWMF and MEE are responsible for the management measures. The plan was agreed among those responsible parties? Please include the budget to implement the plan and how the budget will be secured. Implementation, coordination and monitoring mechanism should be also explained. Original EIA does not include Sea Turtle Management Plan.

20. If all the cost for ESMP implementation should be part of project/engineering cost and the bidder will need to propose such cost for proper ESMP implementation, this should be clarified in the document. PMU has to secure the budget required to the ESMP implementation. In terms of capacity building, in order to maintain the sufficient level of capacity building activities, the cost required for capacity building activities should be indicated.

21. This comment was not addressed. Please clarify the organizational structure/arrangement responsible for ESMP implementation, monitoring and supervision. Please also clarify what kinds of and how often monitoring/supervision reports will be prepared and submitted to whom.

26. As proposed in our response in 16, compensation should be given to the affected people for the ecosystem services provided by the Vandhoo island. Compensation methodology should be clarified and finalized.

ESMP of Ba Dhonfanu and ESMP of Ba Hithaadhoo IWMC

18. Additional Information provides the overview of Baa Atoll UNESCO Biosphere Reserve. However, the potential impacts on the Biosphere Reserve due to the project are not analyzed. Please provide the impact analysis on the Biosphere Reserve.

20. Cost of monitoring for construction phase and budget for training provision are not still provided. Please provide.

ESMP of Raa Ungooaaruu IWMC

We have not received the additional information for Raa Ungooaaruu IWMC like we received for ESIA/ESMPs for the other waste management facilities. Please make sure the following information is updated as proposed.

6. Please label the leachate collection system at the existing compost pad and reflect in the drawing in the ESMP.

8. Please incorporate the summary of the findings of the consultation in the ESMP.

Best regards,
OPSGR

From: Mokshana Nerandika Wijeyeratne
Sent: Thursday, May 30, 2019 3:09 PM
To: OPSOR ESSAT Review <opsorssatreview@worldbank.org>
Cc: Maged Mahmoud Hamed <mhamed1@worldbank.org>; Takeaki Sato <tsato@worldbank.org>; Aki Tsuda <atsuda@worldbank.org>; Paivi Koskinen-Lewis <pkoskinenlewis@worldbank.org>; Roselind Rajan <rrian@worldbank.org>; Karin Shepardson <kshepardson@worldbank.org>; Hocine Chahal <hchalal@worldbank.org>; Susrutha Goonasekera <sgoonasekera@worldbank.org>; Darshani De Silva <ddeasilva4@worldbank.org>; James Orehmie Monday <jmonday@worldbank.org>; Gaurav D. Joshi <gjoshi1@worldbank.org>; Bandita Sijapati <bsijapati@worldbank.org>; Karin Shepardson <kshepardson@worldbank.org>

Subject: Resubmission for Clearance: Maldives Clean Environment Project (P160739) - Safeguards Instruments-Implementation Stage ESMPs and Vandhoo ESIA

Dear Maged,

Thank you for the extensive review comments provided on the MCEP safeguards instruments listed below.

The clients PMU Environmental Specialist has worked closely with the consultants who prepared the documents to address the recommendations and requests for edits and have also provided responses and clarifications in the form of a response matrix, attached here, which provides responses to clarifications and edit request made by the task team and RSA office.

The additional areas and updates have been done via supplements to the Vandhoo Upgrading ESIAs and Dhonfanu and Hithadhoo ESMPs because as per Maldivian law once the Maldives EPA clears the documents, they cannot be updated by the consulting company, and for documents that were originally cleared by the Maldives EPA, the client's consultants has provided supplements to the instruments. The Ungoofaaru IWMC ESMP was done internally so the PMU Environmental Specialist has updated the whole document.

The 4 instruments listed below and supplements addressing Bank comments can be downloaded via the following google drive link.

GOOGLE DRIVE: https://drive.google.com/open?id=1O3dau-V1FI048_vN-90Jlppna9AWBray

1. ESIA Upgrading of Vandhoo RWMF

a. *(Should be read in conjunction with the Vandhoo Operational EMP and Vandhoo Original ESIA, attached here that the client has referred to in the clarifications)*

2. ESMP Dhonfanu IWMC

3. ESMP Hithadhoo IWMC

4. ESMP Upgrading of Ungoofaaru IWMC

As the team in the PMU has been ardently waiting for clearance to move these investments on the ground we appreciate your clearance and guidance and hope the team will be able to clear the documents soon.

Susrutha and I have also done a second round of review on the documents and over the last few days worked on further improvements with the client team who have ensured a quick turnaround.

We look forward to receiving your clearance. Please feel free to let us know if we can clarify anything further during the review process.

Mokshana and Susrutha

(on behalf of Karin and the Task Team)

Mokshana Nerandika Wijeyeratne

Environmental Specialist

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