

**The Republic of Moldova  
Ministry of Education, Culture and Research  
MOLDOVA EDUCATION REFORM PROJECT**

# Environmental Management Framework



**Developed by  
Moldova's Ministry of Education, Culture and Research  
Project Coordination Unit**

**Chisinau, Moldova  
Updated on October 02, 2017**

### ***Environmental Management Framework***

*In order to address the potential impact of Moldova Education Reform Project, the Environmental Management Framework has been developed, which contains the national and the World Bank's requirements on Environmental Impact Assessment for the activities and sub-projects to be financed.*

*This document includes the following environmental rules and procedures: the guidelines on Environmental Assessment of sub-projects, preparation of the Environmental Management Plan; Environmental Screening Checklists for sub-projects; mitigation measures for different activities; monitoring and supervision requirements for the implementation of the Environmental Management Plan, etc.*

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# Acronyms

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BP	Bank Procedures
CPS	Country Partnership Strategy
CPF	Country Partnership Framework
DCFTA	Deep and Comprehensive Free Trade Agreement
EA	Environmental Assessment
EG	Environmental Guidelines
EIA	Environmental Impact Assessment
ELV	Emission Limit Values
EMF	Environmental Management Framework
EMIS	Education Management Information System
EMP	Environmental Management Plan
ES	Environmental Specialist
EU	European Union
FI	Financial Intermediary
GEF	Global Environmental Facility
GRE	Grievance Redress Mechanism
GoM	Government of Moldova
IDA	International Development Association
IEC	Important Environmental Component
IFC	International Finance Corporation
IPM	Integrated Pest Management
LOC	Line of Credit
MAC	Maximum Allowable Concentrations
MDL	Moldovan Lei
MECR	Ministry of Education, Culture and Research
MARDE	Ministry of Agriculture, Regional Development and Environment
MERP	Moldova Education Reform Project
MSIF	Moldova Social Investment Fund
NGO	Non-governmental Organization
OM	Operational Manual
OP	Operational Policy
PCF	Per Capita Financing
PDO	Project Development Objective
PFI	Participating Financial Institutions/Intermediaries
PIA	Project Implementing Agency
PISA	Programme for International Student Assessment
PCU	Project Coordination Unit
RM	Republic of Moldova
RSF	Risk Sharing Facility
SEE	State Ecological Expertise
SEI	State Ecological Inspectorate
SEIA	Statement on the Environmental Impact Assessment
TA	Technical Assistance
ToR	Terms of Reference
USA	United States of America
WB	World Bank

# Executive Summary

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## *Project background*

1. The Moldova Education Reform Project (MERP) was approved by the World Bank Board of Executive Directors in January 2013 with the Project Development Objective (PDO) of *strengthening the quality of education while supporting the efficiency reforms being implemented in the education sector*. Since its approval, the MERP has been restructured three times: (i) in July 2015 to trigger the Bank’s environmental safeguard, at which time this Environmental Management Framework (EMF) was prepared; (ii) in February 2017 to introduce changes to design and implementation arrangements; and (iii) in September 2017 to allow for the inclusion of two schools with less than 600 students to be rehabilitated. An updated version of the EMF was publicly disclosed in September 2017 to update the project description and inform that school rehabilitations would cover the construction of a teachers’ workshop in one of the beneficiary schools.

2. As part of the February 2017 restructuring, the PDO was changed to be: *to improve learning conditions in targeted receiving schools and strengthen the Recipient’s education monitoring systems, while promoting efficiency reforms in the education sector*.

3. The Government of Moldova and the World Bank are currently discussing an Additional Financing to the MERP to cover the costs associated with the scale-up of selected activities initiated under the original credit, as well as the addition of a few new complementary activities. As part of the approval process of the Additional Financing, the World Bank Board of Executive Directors will be asked to consider a third modification to the Project Development Objective to be: *to improve learning conditions in targeted schools and strengthen the Recipient’s education monitoring systems, while promoting efficiency reforms in the education sector*.

4. As part of the preparation of the Additional Financing, this Environmental Management Framework document was updated. However, the Additional Financing will not finance rehabilitation activities; all rehabilitations under the project are being supported by the original credit approved in 2013. Thus, while the Additional Financing will introduce changes in the project description, implementation and activities, as reflected in this updated Environmental Management Framework (EMF), environmental guidelines, policies and procedures remain substantially the same as those in place since the adoption of an EMF for the project.<sup>1</sup>

5. The project has three components:

- a. **Component 1: Strengthening the Quality of Education.** The objective of this component is to contribute to the strengthening of the quality of education in the General Education sub sector in Moldova. Support to the strengthening of quality is provided in four main areas: (i) development and implementation of quality assurance standards for receiving schools; (ii) establishment of teacher and school directors training and remuneration systems; (iii) improvement in the student assessment systems; and (iv) improvement in the quality of data and management information systems.

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<sup>1</sup> It should be noted that the changes in design and implementation arrangements approved in the February 2017 restructuring did not result in substantial changes in terms of environmental policies and procedures. As such, the EMF was not updated at that time. However, those changes were reflected in a subsequent revision to the EMF –version dated and publicly disclosed in September 2017.

- b. **Component 2: Improving the Efficiency of the Education Sector.** The objective of this component is to improve the efficiency of the sector by eliminating excess capacity and creating a leaner education system. In the context of this project, “efficiency” refers to the re-organization of the school network so that its use can be optimized, and the allocation of resources based on a per capita financing formula rather than historical norms.
- c. **Component 3: Improving the Ministry of Education, Culture and Research’s Capacity to Monitor the Reform.** The objective of this component is to support strengthening of the institutional capacities of the Ministry of Education, Culture and Research to implement, measure and monitor the Project, including the implementation of a beneficiary feedback system, which would also facilitate the collection and management of grievances as required by Bank policy.

6. **Location.** The sub-projects<sup>2</sup> to be supported under the MERP are being implemented countrywide based on agreed selection criteria.

7. **MERP environmental category.** MERP was originally designed as a Category “C” in terms of the World Bank’s environmental safeguards. However, as the first set of schools to undergo rehabilitation were identified, it became clear that the extent of the proposed work was greater than originally anticipated, and had potential environmental impacts. Thus, in agreement with the Ministry of Education, Culture and Research, the World Bank re-categorized the project’s environmental category to “B” in July 2015<sup>3</sup>, thus requiring that an Environmental Management Framework (EMF) be prepared for the whole project, followed by individual Environmental Impact Assessments (EIA) or Environmental Management Plans (EMP) for each site, depending on the extent of the rehabilitation.

8. **Potential environmental implications of the proposed activities.** Individual school rehabilitations, if not properly managed, might generate a series of social and environmental impacts, such as: (a) Dust and noise due to rehabilitation activities; (b) Dumping of construction wastes, accidental spillage of machine oil, lubricants, paints, and solvents, etc.; (c) Ground water and surface water contamination; (d) Asbestos which might be a real health concern for the construction workers and general public in the vicinity of the rehabilitated premises, in particular when inhaled; (e) Labour & safety impacts; and (f) Air pollution. These potential adverse impacts are site specific, relatively minor and can be efficiently managed during project implementation.

9. **Potential social impacts.** The rehabilitations are expected to generate both direct and indirect positive social impacts. Direct positive social impacts will result from improved basic conditions in schools, including sanitation, ventilation, heating, etc. Longer-term indirect positive impacts will relate to overall improvement of education quality, contribution to poverty reduction, and improved accessibility to people with physical disabilities. The adverse social impacts might be associated with the labour safety and health issues in case the prescribed mitigation measures are not followed by contractors during the schools’ rehabilitation.

10. **Triggered World Bank (WB) Operational Policies (Ops).** As project activities might generate some environmental and social impacts, OP 4.01 *Environmental Assessment* was triggered. At the same time, as all proposed activities are to be implemented within existing settlement boundaries and within land already used by schools, the project will not have an impact on wildlife and natural habitats, and thus OP/BP 4.04 *Natural habitats* are not triggered. No impact is expected on physical cultural resources, and no schools specified in the national or local physical cultural resources will be included in the project, and therefore OP/BP 4.11

<sup>2</sup> Sub-projects refer to the schools that will undergo rehabilitation to meet the Operational Quality Standards.

<sup>3</sup> First restructuring, as approved by the World Bank Board of Executive Directors in July 2015.

*Physical Cultural Resources* is not triggered. Additionally, project funds will not support any activities requiring the involuntary displacement of existing occupants or economic users of any plot of land, regardless of its current ownership, or loss of or damage to assets including kiosks, fences and others. The Operational Manual (also referred as Project Operational Manual - POM) includes an environmental screening procedure to be followed by MERP. The Ministry of Education, Culture and Research and Moldova Social Investment Fund (MSIF) are responsible for closely monitoring the application of screening procedures, with the support of the Bank Task Team. With these restrictions in place, the project does not trigger OP/BP 4.12 *Involuntary Resettlement*.

11. ***Environmental Management Framework (EMF)***. To address safeguard issues, the Ministry of Education, Culture and Research prepared the EMF applicable to rehabilitations supported by MERP. The EMF provides guidelines to determine when Environmental Assessments (EAs), Environmental Management Plans (EMPs), or EMP Checklists should be prepared; as well as their preparation, implementation and monitoring arrangements. The document also includes Environmental Guidelines for different types of proposed sub-projects, provides guidance on potential impacts and generic mitigation measures to be undertaken for sub-projects in *civil works* at all stages – from identification and selection, through the design and implementation phase, to the monitoring of results. Furthermore, the EMF provides a monitoring plan format that includes monitoring indicators, timing, methods, and institutional responsibilities.

12. ***Environmental screening***. All rehabilitations supported under the MERP are subject to environmental screening as per criteria laid down in this EMF. *Sub-projects expected to have a significant environmental impact and requiring a full Environmental Impact Assessment (EIA) (those that would be considered Category A by the World Bank) are not eligible to be part of the project.* Most of the sub-projects fall under Category B, which require preparing an Environmental Management Plan (EMP) Checklist; in the case of constructing new boilers or water supply and sanitation activities it is necessary to conduct a simple Environmental Impact Assessment (EIA) and prepare a site-specific Environmental Management Plan. It is also expected that sub-projects related to small refurbishing and rehabilitation activities will have insignificant environmental impact and will fall under Category C, which will not require any further EA activities.

13. ***Integration of the EMF into project design and implementation***. The EMF is to be used together with the Project's Operational Manual (POM). EMP Checklists and site-specific EMP documents are to be included as part of civil works contracts, both into specifications and bills of quantities and contractors will be required to include the related cost in their financial bids. The Bank is expected to provide guidance to the project implementation team, so they can promote compliance with the environmental documentation prepared for the site, as well as the Bank's overall environmental safeguard requirements. The Bank will also periodically supervise the safeguards implementation for compliance. Project beneficiary schools should receive a copy of the EMF and the site-specific EMP so they can also oversee compliance on the part of contractors.

14. ***EMF disclosure and consultation***. The Ministry of Education, Culture and Research's Project Coordination Unit disseminated the draft EMF to key stakeholders, and, also, on March 20, 2015, the document was posted on a Public Consultation web-platform ([www.particip.gov.md](http://www.particip.gov.md)) for broad access to the public. On March 31, 2015, the Ministry of Education, Culture and Research organized a consultation on MERP and EMF provisions. After the consultation, the draft EMF document was revised to consider inputs from consulted parties and posted on the website of the Ministry of Education, Culture and Research, and submitted to the World Bank for disclosure in the Bank's external website.

15. In September 2017, the EMF was updated for the first time and publicly disclosed by the Ministry of Education, Culture and Research to realign its project description and



implementation arrangements with the changes introduced through a project restructuring approved by the Bank in February 2017.<sup>4</sup> As previously stated, while the restructuring changed some project activities, implementation arrangements, and responsibilities, there were no changes in the required environmental procedures from those originally consulted with stakeholders and described in the earlier version of the EMF. As such, public consultations were not carried out again.

16. As the Government of Moldova and the World Bank are currently discussing an Additional Financing to MERP, including some design changes to the project (formally known as a *restructuring* within the World Bank), this EMF has been revised for the second time to describe the proposed changes to the project. This document replaces the previous versions of the EMF. Since all revisions to this EMF consist of updates to the project design and activities without any substantial change to the applicability of the environmental policies and procedures, an additional round of public consultations was not necessary. The revised EMF will be publicly disclosed in both Romanian and English languages on the Ministry of Education, Culture and Research's website, the Moldova Social Investment Fund's website and at the World Bank's external website/Internal Document Unit.

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<sup>4</sup> The revised EMF in both Romanian and English language was posted on the Ministry of Education, Culture and Research and Moldova Social Investment Fund's websites.

# Introduction

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1. **Project context.** The Moldova Education Reform Project (MERP) supports the Government of Moldova's reform program by supporting activities that will strengthen the quality of education and lead to a more efficient education sector. The project, including the Additional Financing, would continue supporting activities that are consistent with the Government of Moldova's (GoM) priorities for the education sector and the Country Partnership Framework Fiscal Year 2018-21 (Report No 115716-MD). Specifically, MERP would directly contribute to the implementation of the Moldova Education Code and Moldova Education Strategy 2020, adopted by the Parliament and entered into force in October and November 2014, respectively. Similarly, it would contribute to the achievement of the Country Partnership Framework Fiscal Year 2018-20 Focus Area 3: Skills Development.

2. *Project scope and objectives.* The proposed revised PDO is to improve learning conditions in targeted schools and strengthen the Recipient's education monitoring systems, while promoting efficiency reforms in the education sector. The proposed revised outcome indicators are:

- Total receiving schools that meet infrastructure requirements under national quality standards;
- Teachers who meet designated teaching objectives;
- School report cards with comparative data on school performance (2014-2018) publicly disseminated; and
- Student-teacher ratio for grades 1-12 of primary and general secondary education increased.

3. *Project description.* The Moldova Education Reform Project (MERP) is organized into three components that support five priority areas of intervention: (i) implementation of quality assurance standards in receiving schools; (ii) establishment of teachers and directors' training and remuneration programs; (iii) improvement of the student assessment system; (iv) strengthening the quality of data and the education management information system (EMIS); and (v) increasing efficiency of General Education<sup>5</sup>, which covers the primary and secondary levels. The project partially supports a results-based approach with part of the original credit linked to the attainment of measurable results, referred to as Disbursement-linked Indicators (DLIs).

4. *Component 1: Strengthening the Quality of Education.* Component 1 is currently divided into two sub-components, the first one being implemented by the Ministry of Education, Culture and Research and supporting interventions strengthening the quality of education in Moldova's general education subsector, and the second being implemented by Moldova Social Investment Fund (MSIF) financing the rehabilitation and upgrading of receiving schools, preparation of designs, and related project management, monitoring and evaluation support. With the approval of the proposed Additional Financing, a third sub-component would be added, under the responsibility of the Ministry of Education, Culture and Research, financing the expansion of activities supported under the original credit and the addition of complementary activities.

5. The MERP supports activities to improve school learning conditions, defined as

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<sup>5</sup> Under this project General Education refers to primary and general secondary schools (gymnasium and theoretical lyceums with humanities and science profiles) as defined at the time of project design.

activities intended to ensure a child-friendly environment that is conducive to learning.<sup>6</sup> While the original credit supports the development of quality assurance standards and the rehabilitation of schools, the Additional Financing would support the provision of science and technology labs for targeted schools. Additionally, the MERP would support the provision of equipment, teaching and learning materials for students with disabilities and/or special educational needs for selected schools.

6. In order to attain school quality standards, the original credit supports a series of civil works in selected schools including the following: small scale refurbishing activities inside the school premises (e.g., walls repainting, tiling, installation of cable ducts, new water-pipes, new laboratory installations); renovation works involving generation of comparatively large waste quantities (e.g. replacement of floor, exchange of ventilation and or electrical systems, replacement of doors and/or windows); replacement of the asbestos roofs; major refurbishing activities involving removal/reconstruction of walls (especially when containing asbestos isolations or sheets); refurbishing activities including replacement of ceramics; remodelling of the existing offices; connection of the schools to the water supply and sanitation; construction of toilets inside the school premises as well as of septic tanks. A special group of activities would relate to heating energy conservation, including: insulation of walls, basements and attics, repair/replacement of external doors and windows, window optimization; boiler upgrade/replacement, including construction of new boiler rooms; fuel switching mostly from coal to natural gas; installation of biomass boilers, reflective surfacing of walls behind radiators; other energy conservation measures. Finally, in the case of one school – the M. Manole Lyceum in Salcuta Village in the Causeni rayon, MERP will also support the construction of a teachers' workshop within the school land. The list of 21 schools is included in annex G.

7. With the Additional Financing, the project would continue to improve teachers' pedagogical knowledge and skills and directors and deputy directors' managerial and leadership skills. While the original credit supported the development and roll out of a teachers' training program for an initial group of teachers, the Additional Financing would support an evaluation of that training program with the purpose of further enhancing it, including the development of additional awareness modules on gender and inclusive education, and expanding training coverage. The original credit also supported the development and roll out of the school managers' training program for a group of school directors and deputy directors. Under the Additional Financing, this training would be evaluated, enhanced based on the evaluation, and scaled up. Additionally, the Additional Financing would support developing in-depth special education modules and training teaching support staff and psycho-pedagogues working with students with disabilities and/or special educational needs.

8. The MERP would also continue financing interventions to strengthen education monitoring systems. This includes new efforts to develop the capacity of the National School Inspectorate, the institution under the Ministry of Education, Culture and Research responsible for assessing general education, accrediting institutions and assuring quality in general education by monitoring policy implementation and supporting teachers and directors.

9. The MERP would also continue supporting the National Agency for Curriculum and Evaluation to deepen its capacity to carry out national assessments and participate in international assessments, including the Programme for International Student Assessment (PISA) 2018 and 2021, and analyze assessment results to support policy formulation by the Ministry of Education, Culture and Research. This would involve additional training on

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<sup>6</sup> The Ministry of Education, Culture and Research formally adopted these standards in 2015 which broadly and ambitiously define what consists of a child-friendly learning environment. Those standards cover all aspects concerning the functioning of a school, including management, institutional capacity, and curriculum/educational processes. Based on the approved *Quality Standards*, the Ministry of Education, Culture and Research developed an instrument defining implementable and measurable targets that should be the minimally required inputs for a school to be operating in accordance with those quality standards – the “minimum operating standards.” The MERP has been supporting the implementation of these “minimum operating standards.”

assessment and testing techniques and good practices on organization in assessment agencies, as well as additional support for data systems, including hard and software. Additionally, the MERP would continue to strengthen the Education Management Information System (EMIS) by developing an additional module for technical/vocational education and supporting the roll-out of the preschool module, completing EMIS coverage of the entire compulsory education system, as well as training on the use of the modules on preschool and technical/vocational education and training.

10. Finally, a set of activities would be introduced to promote greater social accountability in schools. This will be achieved through the design of a parent, community and teacher monitoring and feedback mechanism at the local level. This framework of support for citizen engagement will be detailed in the Project's Operational Manual (POM).

11. *Component 2: Improving the Efficiency of the Education Sector.* The MERP would continue promoting efficiency in the sector, albeit with a less ambitious scope. The Per Capita Financing (PCF) formula, piloted in 2010 and under implementation nationwide since 2013, has been successful in promoting the optimization of the school network. Given that the PCF formula has not been reviewed or revised since it came into effect, it may no longer be properly calibrated to the composition of the sector. For that reason, the MERP would support a review of the formula and its impact and, if needed, introduce adjustments that would continue providing incentives for network optimization.

12. The MERP would also support efforts to enhance the efficiency of resource use at the preschool level. Moldova's *Education 2020 Strategy* includes a strong commitment to pre-primary education, and there has been a steady increase in both enrolment and the number of preschools in the country over the last ten years. The MERP would support piloting and evaluating a new financing mechanism for preschools in two rayons with the aim of enhancing transparency, efficiency and sustainability of expenditure on pre-primary education.

*Component 3: Improving the Ministry of Education, Culture and Research's Capacity to Monitor the Reform.* The objective of this component is to finance, inter-alia, consulting and non-consulting services, operating costs, and training for the Ministry of Education, Culture and Research to support the implementation, monitoring and measurement of the project. This component also provides adequate resources and expertise to finance key activities in the Project towards the attainment of its Disbursement-linked Indicators. As MERP was designed before the corporate requirement for citizen engagement came into effect, the Additional Financing would include citizen engagement activities to promote social accountability at the schools. This would complement efforts by the Ministry of Education, Culture and Research to enhance monitoring and oversight, providing vital feedback from school users. Under Component 3, the Additional Financing would finance the implementation of a grievance redress mechanism for the project as required by Bank's Policy 4.01.

13. *Location.* The sub-projects to be supported under MERP were identified based on specific criteria and will be implemented countrywide. The criteria is included in the POM.

14. *Project environmental category.* The project was originally designed as a Category "C" in terms of the World Bank's environmental safeguards. However, as the first set of schools to undergo rehabilitation were identified, it became clear that the extent of the proposed work was not minor as originally anticipated, and had potential environmental impacts. Thus, in agreement with the Ministry of Education, Culture and Research, the World Bank re-categorized the project's environmental category to "B", requiring that an Environmental Management Framework (EMF) be prepared for the whole project, followed by individual Environmental Impact Assessments (EIA) and/or Environmental Management Plans (EMP) for each site, depending on the proposed work.

15. *Environmental Management Framework (EMF)*. To address safeguard issues, the Ministry of Education, Culture and Research prepared the project's EMF. The EMF provides guidelines to determine when Environmental Impact Assessments (EIAs), and/or Environmental Management Plans (EMPs)/EMP Checklists should be prepared; as well as their preparation, implementation and monitoring. The document also includes Environmental Guidelines for different types of proposed sub-projects, provides guidance on potential impacts and generic mitigation measures to be undertaken for sub-projects at all stages – from identification and selection, through the design and implementation phase, to the monitoring of results. Furthermore, the EMF provides a monitoring plan format that includes monitoring indicators, timing, methods, and institutional responsibilities.

# 1. Environmental Impact Assessment Policies, Rules and Procedures

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## 1.1 National environmental legal framework

10. This section describes the laws relevant to environmental management of sub-projects to be supported by the MERP:

11. *Law #1515 on Environmental Protection (1993)*. This law establishes the basic legal framework for drafting special normative acts and instructions in particular issues of environmental protection in order to:

- ensure the right of each person to a healthy and aesthetically pleasant environment;
- achieve the ultimate responsibility of each generation for environmental protection towards the future generations;
- obtain a wider range of use of natural resources without exceeding the allowable limits, avoiding their depletion and degradation, the risk for people's health and other unwanted and unpredictable consequences;
- protect the soil and subsoil, water and air from chemical, physical and biological pollution;
- maintain the biodiversity and genetic resources, integrity of natural systems, historical and cultural national values; and
- restore ecosystems and their components affected by human activity or natural disasters.

12. *The Law #272 on Water (2011)*. This law, partially harmonized with European Council directives: no. 91/271 / EEC of May 21, 1991 concerning urban waste water treatment and no. 91/676 EEC of December 12, 1991 on the protection of waters against pollution caused by nitrates from agricultural sources, with the European Parliament and Council Directives; no. 2000/60/EC of October 23, 2000 establishing a framework for the Community action in the field of water policy; no. 2006/7/EC of February 15, 2006 concerning the management of bathing water quality; no. 2007/60/EC of October 23, 2007 on the assessment and management of flood risks; no. 2008/105/EC of December 16, 2008 on environmental quality standards in the field of water policy, establishes the legal framework necessary for the water management, protection and use. This law is aimed at:

- establishing a legal framework for the management, protection and efficient use of surface water and groundwater based on the evaluation, planning and participatory decision-making;
- establishing the rights on water use and promotion of investments in the water sector;
- establishing the mechanisms for water protection, preventing further degradation of water, protecting and restoring the aquatic environment, gradual convergence and systematic protection and their management in line with the European requirements; and
- providing a sufficient supply of good quality surface water and groundwater, that it is necessary for a sustainable, balanced and equitable water use.

13. *Law #303 on Public Services of Water Supply and Sewerage (2013)*. The purpose of this law is the establishment of the legal framework for the creation, organization, management, regulation and monitoring of the public services of supply with drinking water, technological water, the sewerage and treatment of waste household and industrial water in terms of

accessibility, availability, reliability, continuity, competitiveness and transparency, with observance of the quality, safety and environmental protection standards. This law regulates:

- the activity for provision of public services of water supply and sewerage;
- exploitation, maintenance, expansion and functioning of public service of water supply and sewerage;
- determination and approval of regulated tariffs for public services of water supply and sewerage;
- safety and reliability of water supply to consumers;
- protection of consumers' rights on public services of water supply and sewerage; and
- the guaranteed non-discriminatory access of all individuals and legal entities to public services of water supply and sewerage in accordance with the contractual conditions and legislative and other normative acts in the field.

14. Concomitantly, this law establishes the competences of the central and local public authorities in the area of public service of water supply and sewerage, and of the regulating central public authority, as well as the rights and obligations of the consumers and operators providing public service of water supply and sewerage in the localities, other provisions concerning functioning of public service of water supply and sewerage.

15. *Law #1402 on Public Utility Services* (2002). This law establishes the unified legal framework for the creation and organization of public utility services in the territorial administrative units, including monitoring and control of their functioning. The public utility services ensure the supply / provision of the following services:

- water supply;
- the supply of heat;
- sewerage and wastewater and rainwater treatment;
- sanitation, greening of localities;
- provision of local public transport; and
- management of public and private housing fund.

16. *Law #10 on State Supervision of Public Health* (2009). This law regulates the organization of the state supervision of public health, establishing the general requirements for public health, the rights and obligations of individuals and legal entities and the modality to organize the public health state supervision system and to ensure the optimal conditions for achieving the health potential of each individual throughout the life by the society's organized effort to prevent diseases, protect and improve people's health and the quality of life.

17. *Law #209 on Waste* (2016). This law establishes the legal basis, state policy and necessary environmental measures and health of the population by preventing or reducing the negative impact caused by waste management, as well as by reducing general impact of resources use and increasing efficiency of their use.

18. *Law #1422 on Air Protection* (1997). This law is aimed at maintaining the air purity and improving the air quality - component of the environment, preventing and reducing the adverse effects of physical, chemical, biological, radioactive and other factors on the atmosphere, with adverse consequences for the population and /or the environment, and regulates the activity of individuals and legal entities, irrespective of type of ownership and legal form of organization, when he/she directly or indirectly affects or may affect the air quality.

19. *Land Code* (1991). The Land Code establishes the relations and rights of land ownership and the basic framework of land use. Article 5 states that land conservation should be a priority while implementing any kind of activities. Article 23 is particularly important

because it stipulates cases of termination of land rights, including use of the land in ways that result in soil degradation, chemical and other pollution, deterioration and destruction of ecosystems or their components. The obligations of the land owners (art. 29) are: (i) use of land to conform to its intended and planned use; (ii) observe conditions of land exploitation; (iii) ensure structure of crop rotation to conform to good agricultural practices; (iv) apply chemical inputs only to recommended levels; and (v) to provide protection and improvement of soil fertility.

20. *Law #721 on Quality in Construction (1996)*. This law determines juridical, technical, economic and institutional aspects related to the construction activities and its quality. The Law stipulates that construction requirements should guarantee resistance and stability, fire, hygiene and environmental safety, etc. Article 13: construction, modernization, strengthening, repair/renovation is implemented only in accordance with project documentation worked out by physical and juridical persons authorized for such types of works and verified by authorized specialists in the field. Article 14: design and construction of buildings is implemented by physical and juridical persons licensed for activity in the field.

21. *The Law #835 on Principles of Urbanism and Territorial Improvement (1996)*. This law relates to planning, location and construction of buildings, including any modifications to buildings. Article 6(3) states that documentation for town-planning and territorial development establishes the location of land zones and rules for their use. Certificates of urbanism and permits for construction are issued based on this documentation. For construction purposes based on approved documentation, Article 52 stipulates that local public administration shall provide permits for operations and also for any changes of operation location. Assessment of potential environmental impacts of above activities and developments, and the provision of ecological expertise is to be conducted in accordance with the Laws on Ecological Expertise and EIA.

## **1.2 National Environmental Impact Assessment Regulations**

22. *Law #851 on Ecological Expertise and Environment Impact Assessment (1996)*. The law determines goals, objectives and principles of the State Ecological Expertise (SEE), as well as the basic rules for organization and conducting the SEE. The Law describes in detail SEE procedures, demands the reporting, rules for compliance and submission of documentation on SEE, revision of SEE documentation etc. The State Ecological Expertise is a part of a group of activities working toward environmental protection through which the potential impacts on environment from planned economic activity, compliance of parameters of these activities with legislation and normative acts, norms and standards in force are identified and mitigated.

23. According to the Law on Ecological Expertise, project documentation for the objects that may adversely affect the environment is a subject of SEE, which in turn determines whether it complies or not with environmental protection requirements. Decisions on Ecological Expertise can be considered as the basis for approval or refusal of the project. Ecological Expertise is conducted prior to making decisions on planned economic activities, and it is mandatory for all economic activities that may have a negative impact on the environment regardless of their destination, ownership, investments, location, source of financing etc. In case the objects can affect the environment severely, their planning documentation is subject of an EIA to be conducted prior to SEE.

24. *Law #86 on Environmental Impact Assessment (2014)*. This law establishes the goal of preparing documentation on the Environmental Impact Assessment (EIA), its procedure, coordination and approval, and includes the *list of objects* and types of activities for which an EIA is compulsory prior to their design. The EIA is carried out to determine the requisite measures to prevent adverse ecological impacts due to the implementation of certain planned objects and types of activities. The law describes the requirements for documentation on the



EIA (materials in which the direct and indirect impacts of planned objects on air, water, soil, landscape, protected areas, fauna, flora, cultural and historic monuments, socio-economic situation are establishing, describing and evaluating; comparison of alternative solutions and substantiation of the best one; suggested mitigation activities). On the basis of the developed documentation for the EIA, the client designs a Statement on the EIA in which all materials, calculations and research are presented and systematized, including the EIA content (title of the project; character of activity; location; substantiation for location; project duration; technical and technological characteristics of the project; suggested technical solutions; project cost; localities affected by projects; information of direct impacts on the environment --water, soil, etc.; land to be occupied by project; water collection, use and source; sources of raw materials, transport and other infrastructure, emissions to air, wastes and their utilization, etc.); order of elaboration and submission documentation on EIA, evaluation of EIA documentation, environmental decision on EIA documentation, etc.

25. *Instruction #188 on Order of Organization and Conducting of the State Ecological Expertise (2002)*. The State Ecological Expertise is applied for any new construction, rehabilitation, and upgrading. All design documents should be presented to the State Ecological Expertise units (headquarters of the State Ecological Inspectorate -SEI-and territorial ecological inspections). Technical solutions, reflected in the submission for SEE technical documentation have to be sufficiently substantiated in relation to reduction/mitigation of the impact on environment. The instruction is accompanied by a series of annexes, which: (i) describe in detail requirements for project documentation submitted to SEE; (ii) nominate subdivisions of MoEn responsible for SEE different types and scales of projects; and (iii) establish requirements for every chapter or volume of project documentation, etc.

### 1.3 National Environmental Impact Assessment Procedures

26. In Moldova, the EIA procedure is established by the *Law on Environmental Impact Assessment #86* from 2014. EIA procedures are applicable to projects that are complex and potentially dangerous to the environment and which could lead to significant impact; it aims to prevent and mitigate the project's impact even at the design stage. The EIA should be conducted at an early stage of the project in case new construction, upgrading, reconstruction, modernization, production profile changes, conservation or liquidation of existing enterprises, or new development planning.

27. *Project Environmental Screening*. Following national environmental procedures, all projects may be conventionally divided into three main categories:

- a) *First Category* - projects which may have a significant impact on the environment. They require a full EIA before the design stage and can be further developed (detailed engineering design) with a positive approval (Environmental Agreement) of the EIA findings by the State Ecological Expertise. The projects in the First Category mainly correspond to World Bank Category A projects as well as partly to Category B projects, e.g., electrical transmission, nature protection projects, some watershed projects (e.g., protection strips along river and water bodies), some rural water supply projects (for grouped water intakes with one thousand m<sup>3</sup>/day and more for underground water intake and 10 thousand m<sup>3</sup> per day for surface water intake), etc.
- b) *Second Category* - projects not listed in the list of "first category", which may have less significant impact on the environment. They require ecological substantiation of project activities. Such substantiation is described in a special Environmental Chapter of the project documentation, which must contain information on potentially affected environment as well as outline the main potential environmental impacts and mitigation measures. The Environmental Chapter must

be included in the project design documentation and, respectively, be passed through the State Ecological Expertise before project implementation. The Second Category mainly corresponds to World Bank Category B projects. Based on the proposed project activities, most of sub-projects under the Moldova Education Reform Project would fall under this Category.

- c) *Third Category* - projects which are expected to have minor impact on the environment and therefore do not need to go through the formal procedures of an EIA and SEE. The Third Category fully corresponds to World Bank Category C projects. It is expected many of the MERP sub-projects which would support only minor rehabilitation of civil works will fall under this Category.

28. *EIA review and approval process.* According to the Law on EIA #86 (2014), documentation for the projects that may adversely affect the environment is subject to examination by the Ministry of Environment. The main goal of this examination is to determine whether the project documentation complies with environmental protection requirements and to check whether all environmental standards/principles are adhered, and the environmental protection measures are addressed. An EIA should be conducted prior to making decisions on planned economic activity, and is compulsory for project and planning documentation regarding planned economic objectives and activities that affect or may affect environmental conditions and/or envisage use of natural resources, regardless of destination, placement, type of ownership and subordination of these objectives, the amount of capital investments, source of funding and method of execution of construction works.

29. The decision (Environmental Agreement) of the state examination is the basis for further approval or refusal of the project documentation. The purpose of the EIA is to identify the impact that these projects may have on the environment and to provide solutions to mitigate any significant effects that could occur as a result of project implementation. All EIA conclusions, including list of mitigation measures and environmental management plan should be outlined in the chapter on “Environment Protection” of the Design Document.

30. In the case of the MERP, for the most of the sub-projects it will be necessary to organize the SEE at the district level. In the case of designing EMP Checklists and only when it will be necessary to conduct a simple EIA and EMP (mostly for constructing new boilers and water supply and sanitation activities) it will be necessary to present the documents to the SEE at the level of State Ecological Inspectorate headquarters.

31. *EIA disclosure and consultation.* Public consultations for the projects which require a full EIA are compulsory at the initial stage of the project before preparing the EIA (at the scoping stage) and at a later stage, when the Statement on EIA is disclosed to the public prior to reviewing the final (corrected) documentation by the state environmental authority; the existing national public consultation procedure for project’s classified as in the “First Category” in Moldova fully complies with the Bank’s required procedures for Category A projects. For projects not listed in the Law, public consultation is not compulsory, thus the procedure is not consistent with World Bank requirements for Category B projects.

32. Based on the results of the EIA documentation and public consultations, the responsible environmental authorities prepare the official decision on the EIA. A positive decision on the EIA documentation serves as official basis to proceed with further project design.

33. The EIA procedure is a complex one, and consists of subsequent steps of documentation submission and approval. The developer (initiator of the planned activity) is responsible for the organization of the EIA study, conducting consultations, presentation of EIA documentation, and its associated cost.

34. *Projects that require SEE of design documentation.* All projects which may have a

negative impact on the environment but are not listed in Law #86 on EIA (“Second Category”), will require a SEE before construction. The SEE procedures are usually applied after the feasibility and engineering design stages. The design documentation for these projects --usually linked with construction, reconstruction and enlargement-- are to be developed in line with technical documentation.

35. The sections “Environment Protection” and “Environment Protection during Construction” in the project documentation should be developed only by specialists in the fields. Technical solutions, reflected in the technical documentation submitted to SEE have to be sufficiently substantiated in relation to mitigation of impact on the environment.

36. *Steps in conducting EIA and SEE.* For project approvals, the following steps are to be followed:

- a) *Step 1.* Applicant presents a project description (location and intention) to relevant local (rayon or municipal) authorities where it is going to be located to get its approval to proceed.
- b) *Step 2.* Applicant submits the project business plan to the district authority (often, to review the business plan, a commission is established, and one member of the commission should be a representative of environmental authority) to receive its approval. The commission determines whether an EIA is required. *If the commission disagrees on approval of the plan,* the applicant may have to provide additional information and/or the commission may request input from other interested parties. *If it is confirmed that no EIA is required* (as per list provided in Law #86 on EIA) the applicant can proceed with the implementation of the project in case he/she received all other needed approval and permits. *If the commission requires an EIA,* then the applicant shall hire an authorized body to conduct the EIA on his/her behalf.
- c) *Step 3.* Once the EIA is conducted, the applicant submits it to the central (in the case of Category A and B projects, specified in the Annex to the SEE Regulation) or local environmental authorities (for small scale projects of Category B – specified in the Annex to the SEE Regulation) for EIA approval. The EIA is submitted to the environmental authorities for their review and comments. Comments may be followed by the: (i) approval, (ii) conditional approval, or (iii) outright rejection of EIA, and hence, the project.
- d) *Step 4.* Upon approval from environmental authorities and obtaining permits issued by all concerned institutions (the officers of entities visited by applicants to get an approval determine what kind of special permits on maximum admissible discharges of wastewater, maximum admissible emissions to air - both are calculated for each particular case; water use; construction certificate as well as license on other than water natural resources use should be obtained from specialized institutions), project implementation is allowed to commence.<sup>7</sup>

## **1.4 National Environmental Management Institutional System**

### **1.4.1 Central Public Authorities**

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<sup>7</sup> The institutions issuing relevant permits might be: State Ecological Inspectorate (wastewater discharge volumes, pollutants in effluent and emissions to air), State Agency for Geology and Mineral Resources (AGeoM) (use of underground water resources), State Agency “Apele Moldovei (use of surface water resources), local public authorities/ mayoralities (certificates, construction authorizations), etc.

37. *Ministry of Agriculture, Regional Development and Environment*. This is the central authority responsible for the development and promotion of state policy in the field of environment and natural resources. It is responsible for: state control over the natural resources use; coordination and control over the implementation of environmental laws and policies; initiating and drafting laws and regulations and issuing relevant instructions/decisions; issuing permits on natural resources uses and licenses for polluting emissions; elaboration, approval and introduction of environmental standards and normative documents in the field of its competence; environmental monitoring; imposing economic sanctions in case of violations of environmental legislation; supervising territorial development and its infrastructure, town-planning, architecture, industry of construction materials and introduction of new techniques and technologies in the sphere of its competence; and drinking water supply and waste water treatment in urban areas, etc. The following institutions are subordinate to the Ministry: State Ecological Inspectorate; State Hydrometeorological Service, State Agency for Geology (AGeoM), State Agency “Apele Moldovei”, and Institute of Ecology and Geography.

38. *State Ecological Inspectorate (SEI)*. The SEI is an environmental protection regulatory and enforcement agency which performs the state control over the rational use and protection/conservation of natural resources. Its role is to control implementation of environmental legislation. The SEI through its country-wide network of territorial headquarters monitors industrial facilities which impacts on environment – its central body deals with the higher-level risk while the district level deals with lower risk projects. The SEI issues permits on use of natural resources and environmental pollution in admissible limits; supervises the level of compliance with ecological norms and requirements, instructions, recommendations, norms on use of natural resources, dangerous products and substances, and wastes; evaluates EIA applications for new developments; provides ecological expertise; regulates and establishes Emission Limit Values (ELVs) and Maximum Allowable Concentrations (MACs), and regulates the emission of dangerous substances into the environment as well as the storage limits of industrial, domestic, hazardous and other wastes; performs environmental pollution monitoring; carries out enforcement of the permits by inspection visits, monitors, and levies fines in cases of non-compliance, initiates legal processing, ceases the activity in case of non-compliance with environmental protection requirements, etc.

39. *State Hydro-meteorological Service (SHS)*. Through the Monitoring Centre on Environmental Quality, the SHS performs regular monitoring of the air, water and soil quality as well as atmospheric radiation background level. Among other responsibilities, the SHS monitors meteorological conditions, Prut and Dniester Rivers’ water flows, hydrological forecast, weather forecast, agro-meteorological monitoring and forecast, etc.

40. *State Agency for Geology and Mineral Resources (AGeoM)*. The AGeoM is responsible for promoting state policy in the field of management and monitoring of underground resources in Moldova and provides an overall umbrella for state organizations and enterprises specialized in underground water use; administrations at district and regional level, as well as organizations specialized in the design and investigation of underground water objects. It performs management of underground water resources and their protection; counting of groundwater resources and monitoring of groundwater quality and regime.

41. *State Agency “Apele Moldovei”*. The “Apele Moldovei” Agency is subordinated to the Ministry of Environment. It is the central technical and administrative organization dealing with surface water resources, and is responsible for management of water resources used for irrigation, domestic and industrial water supply purposes as follows: development of long-term programs concerning river basins and water administration works throughout the country, including centralized water supply facilities, irrigation and drainage, protection against floods or other damage, coordinating of construction, design, and operation activities in the field of water.

### 1.4.2 Local Public Authorities

42. Responsibilities of local public authorities include: approval and supervision of local programs in the field of environmental protection; protection and conservation of historical and natural monuments; natural parks and protected areas; and approval of admissible limit values of emissions and discharges (admissible level of environmental pollution) and limits of natural resources (water) use. These institutions do not have any responsibilities regarding environmental review of project documents (SEE) – reviews are done by the national or local environmental authorities, depending on the level of environmental risks – as specified above.

## 1.5 World Bank Environmental Assessment Policy and Procedures

### 1.5.1 Safeguard Policies and their Relevance to the MERP Project

43. There are 10 key World Bank Environmental and Social Safeguard Policies which are intended to ensure that potentially adverse environmental and social consequences of projects financed by the World Bank (including the International Development Association – IDA) are identified, minimized and mitigated. World Bank Safeguard Policies have a three-part format: *Operational Policies* (OP) - statement of policy objectives and operational principles including the roles and obligations of the Borrower and the Bank; *Bank Procedures* (BP) - mandatory procedures to be followed by the Borrower and the Bank; and *Good Practices* (GP) - non-mandatory advisory material. The World Bank’s Safeguard Policies and their relevance to sub-projects to be funded under the MERP are indicated in the *Table 1* below.

**Table 1. World Bank’s Safeguard Policies and their Relevance to MERP Sub-projects**

Safeguard Policies	Relevance
<b>Environmental Assessment (OP/BP 4.01)</b> This Policy aims at ensuring that projects proposed for Bank financing are environmentally and socially sound and sustainable; to inform decision makers of the nature of environmental and social risks; to increase transparency and participation of stakeholders in the decision-making process	<b>Yes</b> (refer to the description below)
<b>Natural Habitats (OP/BP 4.04)</b> This Policy aims at safeguarding natural habitats and their biodiversity; avoid significant conversion or degradation of critical natural habitats, and to ensure sustainability of services and products which natural habitats provide to human society	<b>No.</b> As all proposed activities are to be implemented within existing locations and settlement boundaries, the sub-projects to be supported under the MERP will not have impacts on wildlife and natural habitats, and thus, this OP is not triggered.
<b>Forestry (OP/BP 4.36)</b> This Policy is to ensure that forests are managed in a sustainable manner; significant areas of forest are not encroached upon; the rights of communities to use their traditional forest areas in a sustainable manner are not compromised	<b>No.</b> No wood harvesting activities or those that would impact the health of the existing forests will be not supported.
<b>Pest Management (OP 4.09).</b> This policy is to ensure pest management activities follow an Integrated Pest Management (IPM) approach, to minimize environmental and health hazards due to pesticide use, and to contribute to developing national capacity to implement IPM, and to regulate and monitor the distribution and use of pesticides	<b>No.</b> The project will not support purchasing and using of pesticides.
<b>Physical Cultural Resources (OP/BP 4.11)</b> This policy is to ensure that: Physical Cultural Resources (PCR) are identified and protected in World Bank financed projects; national laws governing the protection of physical cultural property are complied with; PCR includes archaeological and historical sites, historic urban areas, sacred sites, graveyards, burial sites, unique natural values; implemented as an element of the EA	<b>No.</b> All proposed sub-projects will be screened in this regard and in the case there might be such impacts those projects will be not supported under the project. No schools included in the national/local list of Physical Cultural Resources will be included in the project. Therefore OP/BP 4.11 “ <i>Physical Cultural Resources</i> ” is not triggered.
<b>Indigenous Peoples (OP/BP 4.10)</b> IP – distinct, vulnerable, social and cultural group attached to geographically distinct habitats or historical territories, with separate culture than the project area, and usually different language. The Policy aims to foster full respect for human rights,	<b>No.</b> This Policy is not applicable for Moldova.

Safeguard Policies	Relevance
economies, and cultures of IP, and to avoid adverse effects on IP during the project development.	
<p><b>Involuntary Resettlement (OP/BP 4.12)</b> This policy aims to minimize displacement; treat resettlement as a development program; provide affected people with opportunities for participation; assist displaced persons in their efforts to improve their incomes and standards of living, or at least to restore them; assist displaced people regardless of legality of tenure; pay compensation for affected assets at replacement cost; the OP Annexes include descriptions of Resettlement Plans and Resettlement Policy Frameworks</p>	<p><b>No.</b> Sub-projects will be eligible to become project beneficiaries under the condition that they have not acquired and/or would not acquire land for the needs of activities to be supported with project proceeds through a process which involved and/or would involve officially supported expropriation. The project Operational Manual (OM) will define a screening procedure to be filled by sub-project implementers, and the MERP implementing team will closely monitor the screening procedure, with the support of the WB Task Team.</p>
<p><b>Safety of Dams (OP/BP 4.37)</b> This Policy is to ensure due consideration is given to the safety of dams in projects involving construction of new dams, or that may be affected by the safety or performance of an existing dam or dams under construction; important considerations are dam height &amp; reservoir capacity</p>	<p><b>No.</b> The project will not support any activities which might have impact on dam safety.</p>
<p><b>Projects on International Waterways (OP/BP 7.50)</b> The Policy aims to ensure that projects will neither affect the efficient utilization and protection of international waterways, nor adversely affect relations between the Bank and its Borrowers and between riparian states</p>	<p><b>No.</b> The project not finance any sub-projects which may affect international waterways and in particular: projects involving discharging waste waters directly in the international waterways; abstraction or diversion of international waters; projects related to discharging waste materials in a location that could impact on international waters. These requirements represent screening criteria to be applied by the MERP Implementing Agency.</p>
<p><b>Disputed Areas (OP/BP 7.60)</b> The Bank may support a project in a disputed area if governments concerned agree that, pending the settlement of the dispute, the project proposed for one country should go forward without prejudice to the claims of the other country</p>	<p><b>No.</b> The project will not support any activities in disputed areas.</p>
<p><b>Disclosure Policy (BP 17.50)</b> Supports decision making by the borrower and Bank by allowing the public access to information on environmental and social aspects of projects and has specific requirements for disclosure</p>	<p><b>Yes.</b> The EMF will be disclosed and consulted in the country before appraisal and in the WB's external website. .</p>

*Note:* Reference Documents on World Bank's Operational Policies (OP) and Bank Procedures (BP) are presented in *Annex F*.

### 1.5.2 Screening categories and environmental assessment procedures

44. Environmental Screening is a mandatory procedure under OP/BP 4.01 Environmental Assessment. The World Bank undertakes an environmental screening of each proposed project for which it will provide funding to determine the appropriate extent and type of the Environmental Assessment to be conducted. The World Bank classifies a proposed project into one of four categories, depending on the type, location, sensitivity and scale of the project and the nature and magnitude of its potential environmental impacts<sup>8</sup>. These four Categories are A, B, C, and FI (Financial Intermediary).

- a) **Category A** projects are likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented. These impacts may be sensitive, irreversible, and diverse, with attributes such direct pollutant discharges large enough to cause degradation of air, water, or soil; large-scale physical disturbances of the site and/or surroundings; extraction, consumption, or conversion of substantial amounts of forest and other natural resources; measurable modifications of hydrological cycles; hazardous materials in more than incidental quantities; and involuntary displacement of people and other significant social disturbances. The impacts are likely to be comprehensive, broad, sector-wide, or precedent-setting. Impacts generally result from a major component of the project and affect the area as a whole or an entire sector. They may affect an area broader than the sites or facilities subject to physical works. The EIA for a Category A project examines the

<sup>8</sup> See: Environmental Assessment Update Sourcebook, Environmental Department, April 1993. The World Bank

project's potential negative and positive environmental impacts, compares them with those of feasible alternatives (including the "without project" scenario), and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental performance. For a Category A project, the borrower/recipient is responsible for preparing a report, normally a full EIA (or a suitably comprehensive regional or sector EIA). Category A projects finance activities listed in the Law #86 on EIA (2014) in case they attribute to newly planned activities/enterprises. As mentioned earlier no such sub-projects are eligible to be supported under MERP.

- b) **Category B** projects have potential adverse environmental impacts on human populations or environmentally important areas - including wetlands, forests, grasslands, and other natural habitats - but are less adverse than those of Category A projects. These impacts are site-specific; few if any of them are irreversible. In most cases mitigating measures can be designed more readily than for Category A projects. The scope of an EIA for a Category B project varies from project to project, but it is narrower than that of a Category A assessment. Like Category A, a Category B environmental assessment examines the project's potential negative and positive environmental impacts and recommends measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental performance. The findings and results of an EIA for Category B projects are described in the project documentation (Project Appraisal Document, and Project Information Document/Integrated Safeguards Data Sheet). Most of the sub-projects to be financed under MERP would be of Category B.
- c) **Category C.** An EIA or environmental analysis is not required for Category C projects because they have negligible or minimal direct disturbances on the physical setting. Beyond screening, no further environmental assessment (EA) action is required. Category C projects mainly correspond to activities related to the conventional "Third Category" of projects which are expected to have minor impacts on the environment and therefore do not need to go through the formal procedures of the EIA and SEE. A series of sub-projects expected to be financed under the MERP will fall under this Category.
- d) **Category Financial Intermediary (FI).** A Category FI project involves investment of Bank funds through a financial intermediary, in sub-projects that may result in adverse environmental impacts. The Bank reviews the findings and recommendations of the EIA to determine whether they provide an adequate basis for processing the project for Bank financing. When the borrower/recipient has completed or partially completed the EIA work prior to the Bank's involvement in a project, the Bank reviews the EIA to ensure its consistency with this policy. The Bank may, if appropriate, require additional EIA work, including public consultation and disclosure.

45. The selection of a screening category depends on the scale of project activities and potential impacts, on the project setting, and on the "significance" of potential impacts in terms of the natural and socio-cultural surroundings. Locations such as the following should cause a project to be considered an "A" Category:

- in or near sensitive and valuable ecosystems - wetlands, natural areas, habitat of endangered species;
- in or near areas with archaeological and/or historical sites or existing cultural and social institutions;
- in densely populated areas, where resettlement may be required or potential pollution impacts and other disturbances may significantly affect communities;

- in regions subject to heavy development activities or where there are conflicts in natural resource allocation;
- along watercourses, in aquifer recharge areas or in reservoir catchments used for drinking water supply; and
- on lands or waters containing valuable resources (such as fisheries, minerals, medicinal plants, agricultural soils).

### **1.5.3 Public consultation and disclosure**

46. *The World Bank Public Consultation Procedure.* For all Category A and B projects proposed for World Bank financing, during the EIA process, the borrower/recipient consults all involved parties, including project-affected groups and local non-governmental organizations (NGOs), about the project's environmental aspects, and takes their views into account. The borrower/recipient initiates such consultations as early as possible. For Category A projects, the borrower/recipient consults these groups at least twice: (a) shortly after the environmental screening and before the terms of reference for the EIA are finalized; and (b) once a draft EIA report is prepared. In addition, the borrower consults with such groups throughout project implementation as necessary to address EIA-related issues that affect them. In projects where the exact location of the activities will be identified during implementation, the borrower/recipient must prepare an Environmental Management Framework (EMF) during project design and carry out public consultations of that document.

47. *The World Bank Disclosure Procedure.* For meaningful consultations between the borrower/recipient and project-affected groups and local NGOs on all Category A and B projects proposed for World Bank financing, the borrower/recipient provides relevant materials in a timely manner prior to consultation and in a form and language that are understandable and accessible to the groups being consulted.

48. For Category A projects, the borrower/recipient provides for the initial consultation a summary of the proposed project's objectives, description, and potential impacts; for consultation after the draft EIA/EMF report is prepared, the borrower/recipient provides a summary of the EIA/EMF's conclusions. In addition, for a Category A project, the borrower/recipient makes the draft EIA report available at a public place accessible to project-affected groups and local NGOs.

49. In any Category B project, the EIA/EMF report for a project proposed for World Bank financing is made available to project-affected groups and local NGOs. Public availability of EIA/EMF report in the borrowing/recipient country and official receipt of the report by the World Bank for projects proposed for funding is a pre-requisite to World Bank appraisal [or certain restructurings] of these projects.

## **1.6 The comparison of national and World Bank (WB) Environmental Assessment (EA) requirements**

50. While the basic provisions of the National EA rules and procedures are to some extent similar to the WB requirements, there are several important differences. These differences are related primarily to the following: (a) project environmental screening categories; (b) Environmental Management Plan; and (c) EIA disclosure and public consultation.

51. *Differences in screening categories.* In the existing EIA legal framework there is formal EIA categorization system and the SEE requires that all projects with a potential environmental impact should have in the project design an assessment of the potential impact as well as a set of mitigation measures. Thus, all projects with some environmental impact would require an environmental assessment and, respectively, ecological expertise. These would include in most cases large renovation of the buildings, including replacement of the roofs; construction of new



boilers; construction of toilets and connection to water supply and sanitation. The projects which do not require an EA mainly correspond to activities which are expected to have minor impacts on the environment and therefore do not need to be passed through the formal procedures of EIA and SEE (projects that propose refurbishing and small scale construction or reconstruction activities; small scale energy conservation activities, including replacement of the windows and doors; walls insulation). The scale of the project's EA is decided in each case by the SEE/Ecological Inspectors during the preliminary approval of the project location and of its technical specifications. In the case where World Bank and national categorization/EA requirements differ, the more stringent requirement will apply. This mostly applies to "Third Category" sub-projects. While the national EIA legislation does not refer to small scale activities, including construction and rehabilitation of various buildings, WB requires that these sub-projects be qualified as Category B.<sup>9</sup> In these cases the client will apply the WB criteria and requirements, which consists of preparing an EMP Checklist

52. *Differences concerning EMP.* While the national legislation requires that all projects with potential environmental impacts have relevant mitigation measures in place, it does not require that the EMP specify, along with the proposed mitigation activities, a monitoring plan and reporting requirements, institutional arrangements for EMPs implementation. The national legislation also does not require capacity building activities and inclusion of these expenses in the budget. However, all Category B sub-projects supported under MERP will require the inclusion of a monitoring plan, reporting requirements, and institutional arrangements in the EMP; similarly, budgets must include those expenses.

53. *Differences regarding disclosure and public consultation.* There is no full harmonization between World Bank and national requirements in this regard. According to national legislation, the EIA disclosure and public consultation is mandatory only for large projects (WB Category A projects). At the same time, per the Law on SEE the public might organize at its own initiative a public ecological expertise. The public expertise would be conducted based on an NGO's written request toward local public authority<sup>10</sup>. While organizing such expertise, within seven days, the local public authorities should inform the NGO about decisions taken concerning permission to do so. Public associations conducting Ecological Expertise are obliged to inform the broad local public about the beginning of the expertise and its results. The public and the NGOs have the right to obtain planned and project documentation as well as documentation on the EIA and get acquainted with normative-technical documentation on conducting the SEE. The results of the Public Ecological Expertise are delivered to the bodies conducting the SEE and to the bodies, which make decisions on the implementation of activity – the subject of the Public Ecological Expertise. The results and conclusion of the Public Ecological Expertise have a recommendation character and can have the legal power only after their approval by the responsible state body in the field of ecological expertise. The results of the Public Ecological Expertise can be published in mass-media, delivered to the local public authority, and other stakeholders.

54. In the case of World Bank EA policy, the borrower/recipient is responsible for conducting at least one public consultation for all Category B projects to discuss the issues to be addressed in the EMF or to discuss the draft EMP itself. Therefore, for the project, the implementing agency will review any documentation of the public consultation conducted in the preparation of any national EA documentation to determine if it is consistent with World Bank requirements. If the national public consultation is satisfactory, there would be no further consultation requirement. However, if no public consultation was conducted or the implementing agency determines that the public consultation documentation is not adequate, the borrower/recipient will be required to carry out at least one public consultation to discuss the environmental issues of concern to the locally affected communities and address these

<sup>9</sup> It should be noted that projects/activities considered Category "B" by the World Bank can cover a wide spectrum of potential risks, requiring different EA documentation – from simple environmental assessments to only an EMP Checklist.

<sup>10</sup> No private citizen has the right to conduct public EE.

issues in the EMF/EMP. Documentation for the consultation should be submitted to the implementing agency as part of the project file. The Romanian language version of the EMF/EMP and the record of the public consultation should be located at a public location near the project site and, if available - on the Beneficiary website. Category B EIA projects would be made available to project-affected groups and local NGOs in an easily accessible Ministry of Education, Culture and Research website.

## 2. Potential Environmental Impacts

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### 2.1 Positive impacts

55. Sub-projects to be implemented under the MERP are expected to generate both direct and indirect positive social and environmental impacts. Direct positive social impacts will be generated by improved learning conditions in targeted receiving schools as a result the educational activities being carried out in well-equipped spaces. Indirect positive impacts will relate to overall improvement of education environment, improvement in water and sanitation in schools, better ventilation and heating systems, and schools that are more accessible with people with disabilities. Furthermore, the project would bring positive impacts in terms of energy conservation and reduction of air pollutants.

### 2.2 Negative environmental impacts

56. Negative impacts mainly relate to physical and biological environmental components and are linked to water, air and soil pollution, soil erosion, loss of biodiversity and habitats, energy and water consumption, health and occupational hazards. During construction activities, which may have a relevance to MERP sub-projects, the main negative impacts would be generated during renovation works and relate to soil erosion, soil and water pollution through waste generation, air pollution, acoustic and aesthetics. The most common potential negative impacts from the proposed civil rehabilitation, and re-construction activities, in addition to the construction of the teachers' workshop in the M. Manole Lyceum in Causeni, and their significance are summarized below:

- a) *Dust and noise.*
- b) *Waste handling and spill response:* rehabilitation and (re)construction activities will generate solid and liquid wastes including drywall, machine oil, paints, and solvents. Minor spills of fuel and other materials are likely to occur during civil works activities. Improper handling of on-site wastes and response to spills could result in adverse effects on the local environment including groundwater and students.
- c) *Asbestos:* In the case of inappropriate handling of asbestos this material might be a real health concern for the construction workers, and the general public in the vicinity of the rehabilitated premises in particular when it is inhaled.
- d) *Labour and safety impacts:* during civil works, in particular construction of new boilers and installation of solar panels, if workers do not obey necessary safety rules, they might be subject to various accidents.
- e) *Health impacts* associated with indoor construction activities in the case of the usage of noxious/toxic solvents and glues and of lead-based paints.
- f) *Waste waters* as the results of inadequate implementation of sanitation sub-projects.
- g) *Pollutant air emissions from the boilers.*

## 3. Environmental Guidelines

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### 3.1 Purpose and Content of Environmental Guidelines

57. The purpose of MERP's Environmental Guidelines is to assist project implementation staff in conducting environmental screening in determining the potential environmental impacts of selected sub-projects, and provide the following:

- a) Rules and Procedures for sub-projects environmental screening to be funded under MERP (Annex A);
- b) Requirements for conducting simple Environmental Impact Assessments (Annex B);
- c) Content and format for the Environmental Management Plan and Environmental Monitoring Plan (Annex C);
- d) Proposed mitigation measures to be applied during the project implementation (Annex D); and
- e) Environmental Management Plan Checklist (Annex D).

Since, these are only guidelines and the information contained within is generalized, in some instances, the project implementation staff and safeguards specialist would be advised to seek local professional opinion (e.g., from local environmental authorities, researchers, designers, etc.) for more specific information and consultation.

### 3.2 Rules and Procedures for Environmental Screening

#### 3.2.1 *Introductory notes*

58. Screening of each proposed sub-project supported by MERP is to be undertaken to determine the appropriate extent and type of Environmental Assessment as well as to ensure that it does not trigger any other World Bank safeguards policies. The attribution of the sub-project type to the WB's EA category and respectively, environmental risk that might be generated is to some extent, an expert judgment. High risk sub-projects (Category A) are automatically excluded from receiving support under MERP sub-projects; moderate to low risk sub-projects (Category B) and low to no risk sub-projects (Category C) will be screened according to these guidelines.

59. Generally the significance of impacts and the selection of screening category accordingly depend on the type and scale of the sub-project, the location and sensitivity of environmental issues, and the nature and magnitude of the potential impacts.

60. Examples of sub-projects to be financed under the MERP that fall under Categories B and C, and the proposed type of EA instrument are provided in the Table 2 below.

**Table 2. Examples of sub-project activity types**

Types of activities	Category C	Category B	Suggested type of EA document
Small scale refurbishing activities inside the school premises (e.g. walls repainting, tiling, installation of cable ducts, new water-pipes, new laboratory installations)	X		-
Replacement of the asbestos roofs		X	EMP Checklist
Major refurbishing activities involving removal/reconstruction of walls (especially when containing asbestos isolations or sheets)		X	EMP Checklist
Renovation works involving generation of comparatively large waste quantities (e.g. replacement of floor, exchange of ventilation and or electrical systems, replacement of doors and/or windows)		X	EMP Checklist
Refurbishing activities including replacement of ceramics; remodelling of the existing offices involving potentially hazardous materials like residues from paints, solvents, enamels, and the replacement of larger quantities (several 10's) of windows and doors		X	EMP Checklist
Water supply and sanitation networks		X	Simple EIA and EMP
Public toilets		X	EMP Checklist
Construction of new small scale boilers		X	Simple EIA and EMP
Reconstruction, modernization of heating systems, replacement or modernization of the heat source such as: burner, boiler or external sources, including biomass boiler		X	EMP Checklist
Insulation of building envelope (walls, ceilings, roofs)		X	EMP Checklist-
Repair/replacement of external doors and windows, window optimization	X		-
Fuel switching		X	EMP Checklist
Reflective surfacing of walls behind radiators	X		-
Pipe insulation	X		-
Installation of solar panels for water heating	X		-

61. For Category C sub-projects beyond screening, no further EA action is required. If the MERP implementers meet difficulties with WB categorization of sub-projects, they should consult the State Ecological Inspectorate.

62. The Ministry of Education, Culture and Research and/or MSIF, based on the environmental screening checklist presented in Annex A, is responsible for proposing the category for each sub-project and ensuring that the preparation, consultation and disclosure of the appropriate type of the EA document takes place.

### 3.2.2 Environmental Impact Assessment of Category B Sub-projects

63. After the initial environmental screening of sub-project proposal, for the Category B sub-projects – the implementers should initiate a site specific EIA and prepare the EMP for the sub-project involving water supply and sanitation or construction of new boiler sub-projects. All other types of projects would only require the preparation of an EMP Checklist in order to identify, evaluate and prevent potential environmental impacts and identify mitigation measures that may be incorporated into the design.<sup>11</sup> Table 2 above specifies in which case what type of EA instrument should be applied. Ministry of Education, Culture and Research or MSIF staff should consult with the World Bank in case of doubt regarding the applicable document required for the sub-project.

64. *EMP Checklists.* In the case of sub-project which would involve typical small scale (re)construction activities, it is proposed that a generic EMP checklist-type format (“EMP

<sup>11</sup> The purpose of the EIA and/or EMP is to predict potential effects and improve the environmental aspects of sub-projects by minimizing, mitigating or compensating for negative effects. The *Terms of Reference for an Environmental Impact Assessment* and an *Environmental Management Plan* are attached as *Annexes B* and *C* of the EMF. The sub-project’s applicant is responsible for conducting this study and for preparing the EMPs.

Checklist”) be used, developed by the World Bank to provide “pragmatic good practice” and designed to be user friendly and compatible with safeguard requirements (see Annex D). The checklist-type format attempts to cover typical preventive and mitigation approaches to common civil works contracts with localized impacts. It is anticipated that this format would provide the key elements of an Environmental Management Plan (EMP) to meet Environmental Assessment requirements of the World Bank (under OP/BP/GP 4.01).

65. *The EMP Checklist has four sections:*

- a) *Part 1* is descriptive (“site passport”) and describes sub-project specifics in terms of physical location, description of the works, and list of permits or notification procedures with reference to relevant regulations. Attachments for additional information can be supplemented if needed.
- b) *Part 2* includes safeguards information
- c) *Part 3* includes the environmental and social screening and mitigation measures in a simple “Yes/No” format.
- d) *Part 4* includes a site-specific monitoring plan for activities to be carried out during the rehabilitation activities.

### **3.3 Proposed impact mitigation measures**

66. *Organizational measures.* Before starting the rehabilitation activities, it is necessary to inform the local construction and environment inspectorates and communities about upcoming activities in the media and/or at publicly accessible sites (including the site of the works). Furthermore, it is necessary to have in place all legally required permits. All works should be carried out in a safe and disciplined manner designed to minimize impacts on neighbouring residents and environment. Construction workers should be properly dressed, having when necessary respirators and safety glasses, harnesses and safety boots.

67. *Protection of air quality and dust minimization.* During rehabilitation activities, it is necessary to use debris-chutes above the first floor and to keep demolition debris in a controlled area, spraying with water mist to reduce debris dust. It is also necessary to suppress dust during pneumatic drilling/wall destruction by ongoing water spraying and/or installing dust screen enclosures at site. It is strictly prohibited burning of construction/waste material at the site. For the transportation of any other dusty material to the rehabilitation site watering or covering of the cargo should be implemented. Reduction of dust on rehabilitation site during the dry season of the year can be accomplished by watering the ground surface. Workers that perform the works should be vested with protective clothes and respirators.

68. *Noise reduction.* Before beginning of any of the work it is recommended to inform all potentially affected parties, especially the neighbours, either directly or through local billboards or newspapers of the rehabilitation activities. The noise should be limited by using good management practice and limiting work to regular daily shift, during the vacation time and after school classes. The construction equipment and machinery used should be calibrated according to the Noise Standards.

69. *Construction waste and spills.* A general requirement is that the existing building elements to be rehabilitated (walls, ground cement slabs etc.) should be carefully rehabilitated and the construction waste should be sorted and removed in an organized way and disposed in an authorized land filled. All valuable materials (doors, windows, sanitary fixtures, etc) should be carefully dismantled and transported to the storage area assigned for the purpose. Valuable materials should be recycled within the project or sold. Wastes, wherever possible, should be minimized, separated and handled accordingly. When wastes are separated, they are more manageable. Some materials like doors or ceramic sinks might be usable on the site again. Non-usable materials should be taken to an appropriate place for recycling. Non-recyclable wastes,

in agreement with the municipality, should be deposited in the city landfill. Open burning and illegal dumping of any waste is strictly prohibited. In addition to solid wastes, some amounts of hazardous wastes will be produced on the site: like the remaining from paints, enamels, oiled packaging, oils, material contaminated with oil, insulation material, etc. Based on the provisions of the Environmental Code, all wastes must be collected and handed over to the local self-government body authorized for collection and transportation of hazardous waste.

70. *Asbestos*. The general approach while handling this material is that constructors should avoid crushing/destruction of asbestos plates from the roofs and or from the wall insulation, depositing it in a locked location, to ensure people do not remove them for personal use. Also, constructors should avoid releasing asbestos fibres into the air from being crushed. It is also imperative that while working with asbestos plates workers wear special clothing, gloves and respirators. The use of Asbestos Containing Materials (ACM) will be not allowed within the selected sub-projects. Once the presence of ACM in the existing infrastructure has been presumed or confirmed and their disturbance is shown to be unavoidable, it is the responsibility of the Ministry of Education, Culture and Research and/or MSIF to incorporate the following requirements in the EMP for works:

- a) Provide the specific host country laws and regulations (if any) for controlling worker and environmental exposure to asbestos in construction work and waste disposal.
- b) Determine if licensing and permits of the work by authorities is required.
- c) Develop a plan for doing works involving removal, repair and disposal of ACM in a way that minimizes worker and community exposure. The plan should include:
  - (i) Containment of interior areas where removal will occur in a negative pressure enclosure;
  - (ii) Protection of walls, floors and other surfaces with plastic sheeting;
  - (iii) Construction of decontamination facilities for workers and equipment;
  - (iv) Removal of the ACM using wet methods and promptly placing the material in impermeable containers;
  - (v) Final clean-up with vacuum equipment and dismantling of the enclosure and decontamination facilities;
  - (vi) Burial of the removed ACM and contaminated materials in an approved landfill; and
  - (vii) Inspection and air monitoring as the work progresses, as well as final air sampling for clearance, by an entity independent of the contractor removing the ACM.
- d) Require that the construction firms/and or individuals employed during the construction have received training in relevant health and safety issues.
- e) Provide all construction workers with personal protection means, including respirators and disposable clothing.
- f) Require that the beneficiary or the selected contractor notifies authorities of the removal and disposal according to applicable regulations and cooperates fully with representatives of the cognizant agency during all inspections and inquiries.

71. *Temporary storage of materials (including hazardous)*. Stockpiling of construction material should be avoided if possible. If not, construction materials should be stored on the construction site, and protected from weathering. Hazardous materials like paints, oils, enamels and others should be kept in a locked facility with impermeable surface, and adsorbents like sand or sawdust should be kept in a locked facility.

72. *Ensuring workers health and safety*. The workers should have protective equipment, rubber gloves, respirators, goggles and breathing mask with filter, as well as helmets. Prior to starting civil works, all workers have to pass labour safety training course. In addition, it is necessary to carry out the routine inspection of the machinery and equipment for the purpose of trouble shooting and observance of the time of repair, training and instruction of the workers engaged in maintenance of the machinery, tools and equipment on safe methods and techniques of work. Special attention should be paid to welding operations. It is prohibited to distribute faulty or unchecked tools for work performance as well as to leave off-hand mechanical tools connected to the electrical supply network or compressed air pipelines; to pull up and bend the

cables and air hose pipes; to lay cables and hose pipes with their intersection by wire ropes, electric cables, to handle the rotating elements of power driven hand tools.

73. *Good housekeeping.* This is related to general good practice of keeping the sites tidy and organized, including environmentally relevant activities such as the storage of hazardous materials, access restrictions to non-personnel and workplace health and safety.

### **3.4 Environmental monitoring**

74. Environmental monitoring during sub-project implementation has to provide information about key environmental aspects of the sub-project, particularly its environmental impacts and the effectiveness of taken mitigation measures. Such information enables the implementing agency to evaluate the success of mitigation measures as part of project supervision, and allows corrective action(s) to be implemented in a timely manner, when needed. The EMF identifies monitoring objectives and specifies the types of monitoring, and their link to impacts and mitigation measures. Specifically, the monitoring section of the EMP provides: (a) a specific description, and technical details of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and, (b) monitoring and reporting procedures to: (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

75. If approved, during the sub-project's operation phase, the implementing agency/PCU would perform regular supervisions of the sites to confirm compliance with EA instruments. Separately, World Bank experts will also carry out annual site specific visits to review compliance. Further, in the case of complaints related to non-compliance, the territorial representative of the SEI and other authorities could also perform environmental supervision and monitoring to identify the level of compliance with agreed design, and required mitigation measures to bring it into full compliance with the Environmental Management Plan or making sure the necessary corrective measures have been implemented. The proposed format of Environmental Monitoring Plan is presented in Annex C.

76. The status of compliance with agreed environmental mitigation measures is to be reported to the World Bank by the Ministry of Education, Culture and Research and/or MSIF in their regular (semi-annual) progress reports. In the case of non-compliance, the Ministry of Education, Culture and Research/MSIF with SEI representatives would investigate the nature and reason(s) for non-compliance, and a decision would have to be made on what is needed to bring a sub-project into compliance, or whether financing should be suspended.

77. The Ministry of Education, Culture and Research/MSIF makes available information on monitoring of environmental management activities and mitigation measures in its routine reporting on sub-project implementation to the World Bank and during periodic Bank implementation support visits.

### **3.5 EMP disclosure and consultation**

78. In the case of Category B sub-projects which involve new boiler construction or water supply and sanitation activities, it is necessary to disclose the EIA/EMP document and to conduct public consultations with key stakeholders, including the local population, prior to its start. The purpose of the public consultation is to inform locally affected groups about the sub-project and offer them the opportunity to voice their views of any adverse environmental issues they feel may develop during sub-project implementation. Any legitimate issue raised at the public consultation should be addressed in the EMP. In this way, "the voice of the people" will



be heard and reflected in the MERP sub-project implementation. Documentation of the public consultation outcome should be kept on project files and be included in the EMPs.

79. In the case of all other types of sub-projects which involve mostly reconstruction activities, although no need for a special public hearing, the Ministry of Education, Culture and Research/MSIF should provide information to all interested parties about the construction by installing a notice plate placed at the rehabilitation site. Additionally, all sub-project's specific information as well as the designed EMP Checklists need to be also publicly available at the school and on-line on the Ministry of Education, Culture and Research's webpage.

### **3.6 Integration of the EMP into project documents**

80. The EA provisions would be used for the following:

- a) inclusion of environmental requirements in the Project Operational Manual;
- b) inclusion of EMP/EMP Checklist in construction contracts for individual sub-projects, both the specifications and bills of quantities. Contractors are required to include the cost in their financial bids;
- c) identification of EMP/EMP Check-list follow-up responsibility within the Ministry of Education, Culture and Research/MSIF; and
- d) monitoring and evaluation of mitigation/avoidance measures identified in the site-specific review and in the EMP/EMP Checklist. The necessary mitigating measures would constitute an integral part of sub-project implementation including being part of the contracts binding the contractors to carry out the environmental obligations during construction works.<sup>12</sup>

### **3.7 Sub-projects' EA review and approval**

81. *EA Review and Approval.* The Ministry of Education, Culture and Research/MSIF will submit the sub-project EMPs to the territorial State Ecological Inspection for Ecological Expertise (SEE). In the case of water supply and sanitation sub-projects or construction of new boilers, the EIA & EMP documentation will be submitted to the SEE at the national level. No MERP supported sub-project will be permitted to start until a favourable official written response is received from SEE. Documentation of successful SEE approval should be placed in the sub-project file and available for World Bank verification.

82. *Supervision and monitoring activities.* During sub-project implementation, the Ministry of Education, Culture and Research/MSIF will have overall supervision responsibility for assuring that the measures indicated in the EMP/EMP Checklist are properly performed. In collaboration with the local authorities and the SEL, the Ministry of Education, Culture and Research/MSIF will perform the sub-project environmental monitoring during both the construction and operation phases as specified in the monitoring plan of the EMP/EMP Checklist.

83. *Reporting.* Regular semi-annual MERP progress reports should include a section entitled "Environmental Management". The section should provide a condensed description of the monitoring activities, any issues identified and how they were or are planned to be resolved.

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<sup>12</sup> All contractors will be required to use environmentally acceptable technical standards and procedures during carrying out of works. Additionally, contract clauses shall include requirements towards compliance with all national construction, health protection, safeguard laws and rules as well as on environmental protection.

## 4. Institutional Arrangements for the EMF Implementation

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### 4.1 Overall implementing responsibilities

84. The Ministry of Education, Culture and Research is in charge of implementing the MERP. Project implementation primarily relies on the existing structures of the Ministry of Education, Culture and Research and the activities proposed under the project are part of the everyday work of its staff. Additionally, part of Component 1 will be under the implementation responsibility of MSIF. Specifically, MSIF will be responsible for the rehabilitation of schools financed by MERP, while the Ministry of Education, Culture and Research will be responsible for the rehabilitation of 6 schools financed with funds from the national budget. A group of local consultants (MERP staff) was hired for the implementation of the Project and constitute the Project Coordination Unit (PCU). The Bank, through its regular implementation visits, will also periodically review selected school's environmental documentation as well as carry out site visits to ensure compliance. Specific tasks could be delegated to other government agencies, with the prior approval of the Bank.

85. The Ministry of Education, Culture and Research and MSIF will monitor compliance with the project documents and Financing Agreements regarding the EA process, including conducting periodic monitoring of the screening process of applications for EA requirements.

### 4.2 Major responsibilities of the Ministry of Education, Culture and Research and MSIF

86. The Ministry of Education, Culture and Research and MSIF will ensure that project activities are being assessed from an environmental point of view and that EMPs are adequately implemented. Specifically:

- a) coordination of environmental and EA related issues;
- b) evaluation of the sub-project's eligibility from the environmental point of view and sub-projects environmental screening;
- c) provision of necessary information on the environmental issues to sub-project applicants (especially inform them about the environmental criteria to be used, explain all obligations regarding the EIA procedure etc.);
- d) monitoring environmental impacts within the overall monitoring of the sub-projects implementation; and
- e) communicating with EIA competent authorities (MARDE, SEI).

### 4.3 Ministry of Education, Culture and Research and MSIF Environmental Specialist

87. For the purpose of implementing environmental safeguards and monitoring social safeguards, an Environmental Specialist (ES) was hired to support the Ministry of Education, Culture and Research and MSIF with MERP's environmental requirements. The ES's main responsibility is to coordinate all Environmental Assessment activities and ensure adequate implementation of EMF requirements. The role of the environmental specialist is to: (i) provide assistance to the project's beneficiaries to determine the exact impacts that can be generated by proposed activities supported under the project as well as prescribe the required mitigation actions to be taken; (ii) conduct screening and ensure that due environmental work (EAs/EMPs)

are prepared for the proposed investments; and, (iii) monitor and report on a regular basis the effects on the environment that financed activities may provoke and ensure that mitigation is carried out. The Environmental Specialist also has to regularly and selectively visit sub-projects, and ensure proper environmental monitoring for sub-projects. The ES is also responsible for monitoring any land acquisition issues under MERP sub-projects in order to make sure that OP 4.12 is not triggered.

88. *Training for the Environmental Specialist.* As needed, the World Bank staff are available to provide training and advice to the Ministry of Education, Culture and Research and MSIF on application of World Bank environmental safeguards.

#### **4.4 Construction Companies**

89. All (re)construction and installation activities will be carried out by authorized companies. They are responsible for full and qualitative implementation of the EMP provisions.

## 5. Budget

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90. The amount of funds to be spent for preparing sub-projects EIAs and/or EMP/EMP Checklists, obtaining of necessary permits and other relevant activities are the responsibility of government. However, with the Bank's prior approval, project resources could be used for this purpose. They will depend on the nature of sub-project proposal, its complexity, scale, etc. At the construction and operation stages, the funds to be spent for installations and other activities to ensure mitigation measures against the environmental impacts from sectoral activities is also the responsibility of the government. These costs will depend on particular techniques and technologies used for implementing mitigation measures as well as on their scale, number, variety and other factors.

## 6. EMF's Disclosure and Consultation

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91. A draft Environmental Management Framework was disclosed by the Ministry of Education, Culture and Research on **March 20, 2015** by posting it on a national public web-platform ([particip.gov.md](http://particip.gov.md)), as well as on websites of the Ministry of Education, Culture and Research ([www.mec.gov.md](http://www.mec.gov.md)). The PCU has further forwarded electronically the EMF summary to all interested stakeholders.

92. Consultation on the draft EMF took place on **March 31, 2015** at the Ministry of Education, Culture and Research in Chisinau with the participation of representatives of the MERP PCU, beneficiaries, national environmental authorities and NGOs representatives.

93. During the consultation, the Ministry of Education, Culture and Research presented a summary of a draft EMF to participants. Particularly, the audience was informed about screening procedures of the sub-projects, types of EIA for sub-projects, potential impacts which may be generated by sector activities as well as measures to be taken to prevent/mitigate potential impacts. The consultation meeting's attendees actively participated in the discussions which were mainly focused on proposed environmental screening procedures and the capacity of implementing agencies to perform environmental management and monitoring of sub-projects.

94. After the meeting, the EMF was finalized. The Report on Consultation on the Draft EMF with interested parties is presented in Annex E.

95. The final version of the Environmental Management Framework approved by World Bank was posted on World Bank's external website for its disclosure as well as on MERP page of the website of the Ministry of Education, Culture and Research. Subsequently, the EMF was revised and publicly disclosed in September 2017 to incorporate changes in project activities and implementation responsibilities, albeit with no substantial change regarding policies and procedures described in the EMF.

96. The present document is an updated version of the EMF dated September 2017 and it replaces previous versions. This version of the EMF incorporates additional changes in project design, activities, and implementation that will be submitted to the consideration of the World Bank's Board of Executive Directors as part of processing an Additional Financing for the project.

## Annex A. Environmental Screening Checklist

### Part I

(to be completed for each MERP sub-project)

1. Sub-project name:

2. Brief description of sub-project (to include: nature of the sub-project, cost, physical size, site area, location)

3. Proposed activities (in Yes/No terms)

Types of activities	Yes	No	Comments
Small scale refurbishing activities inside the school premises (e.g. walls repainting, tiling, installation of cable ducts, new water-pipes, new laboratory installations)			
Replacement of the asbestos roofs			
Major refurbishing activities involving removal/reconstruction of walls (especially when containing asbestos isolations or sheets)			
Renovation works involving generation of comparatively large waste quantities (e.g. replacement of floor, exchange of ventilation and or electrical systems, replacement of doors and/or windows)			
Refurbishing activities including replacement of ceramics; remodelling of the existing offices involving potentially hazardous materials like residues from paints, solvents, enamels, and the replacement of larger quantities (several 10's) of windows and doors			
Water supply and sanitation networks			
Public toilets			
Construction of new small scale boilers			
Reconstruction, modernization of heating systems, replacement or modernization of the heat source such as: burner, boiler or external sources, including biomass boiler			
Insulation of building envelope (walls, ceilings, roofs)			
Repair/replacement of external doors and windows, window optimization			
Fuel switching			
Reflective surfacing of walls behind radiators			
Pipe insulation			
Installation of solar panels for water heating			

**Beneficiary:**

**Signature:**

**Date:**

### Part 2

(to be completed by the implementing unit/environmental specialist)

1. Project Environmental Category (B or C)	
2. Simple EIA&EMP is required (Yes or No)	
2. EMP Checklist is required (Yes or No)	
3. What are the specific issues to be addressed in the simple EIA&EMP?	

**Environmental Screener:**

**Signature:**

**Date:**

## **Annex B. Terms of Reference for Conducting an Environmental Impact Assessment**

An *Environmental Impact Assessment (EIA)* report for Categories A and B sub-projects focuses on the significant environmental issues raised by a sub-project. *The MERP will not support any sub-project that is classified as a Category A.* The EIA's primary purpose is to identify environmental impacts and those measures that, if incorporated into the design and implementation of a sub-project, can assure that the negative environmental effects will be minimized. The scope and level of detail required in the analysis depend on the magnitude and severity of potential impacts.

The Environmental Impact Assessment (EIA) Report should include the following elements:

- a. *Executive Summary.* Summary of significant findings and recommended actions.
- b. *Policy, legal and administrative framework.* This section summarizes the legal and regulatory framework that applies to environmental management in the jurisdiction where the study is done.
- c. *Project Description.* Describes the nature and scope of the sub-project and the geographic, ecological, temporal and socioeconomic context in which the sub-project will be carried out. The description should identify social groups that will be affected, include a map of the sub-project site, and identify any off-site or support facilities that will be required for the sub-project.
- d. *Baseline data.* Describes relevant physical, biological and social condition including any significant changes anticipated before the project begins. Data should be relevant to sub-project design, location, operation or mitigation measures.
- e. *Environmental impacts.* Describes the likely or expected positive and negative impacts in quantitative terms to the extent possible. Identify mitigation measures and estimate residual impacts after mitigation. Describes the limits of available data and uncertainties related to the estimation of impacts and the results of proposed mitigation.
- f. *Analysis of Alternatives.* Systematically compares feasible alternatives to the proposed sub-project location, design and operation including the "without sub-project" alternative in terms of their relative impacts, costs and suitability to local conditions. For each of the alternatives, the EMP quantifies and compares the environmental impacts and costs relative to the proposed plan.
- g. *Environmental Management Plan (EMP).* If significant impacts requiring mitigation are identified, the EMP defines the mitigations that will be done, identifies key monitoring indicators and any need for institutional strengthening for effective mitigation and monitoring to be carried out.
- h. *Appendices.* This section should include:
  - i. The list of EIA preparers;
  - ii. References used in study preparation;
  - iii. Chronological record of interagency meetings and consultations with NGOs and effected constituents;
  - iv. Tables reporting relevant data discussed in the main text, and;
  - v. List of associated reports such as resettlement plans or social assessments that were prepared for the sub-project.

## **Annex C. Environmental Management Plan Content**

### ***Part 1. General Remarks***

The *Environmental Management Plan (EMP)* for sub-projects of intermediate environmental risk (Category B sub-projects) may also be an effective way of summarizing the activities needed to achieve effective mitigation of negative environmental impacts (*description of the Environmental Management Plan* is provided in *Part 2* below).<sup>13</sup>

*The EMP format* is provided in *Part 3* below. It represents a model for the development of an EMP. The model divides the sub-project cycle into three phases: construction, operation and decommissioning. For each phase, the preparation team identifies any significant environmental impacts that are anticipated based on the analysis done in the context of preparing an environmental assessment. For each impact, mitigation measures are to be identified and listed. Estimates are made of the cost of mitigation actions broken down by estimates for installation (investment cost) and operation (recurrent cost). The EMP format also provides for the identification of institutional responsibilities for "installation" and operation of mitigation devices and methods.

To keep track of the requirements, responsibilities and costs for monitoring the implementation of environmental mitigation identified in the analysis included in an environmental assessment for Category B projects, a monitoring plan may be useful. A *Monitoring Plan format* is provided in *Part 4* below. Like the EMP, the sub-project cycle is broken down into three phases (construction, operation and decommissioning). The format also includes a row for baseline information that is critical to achieving reliable and credible monitoring. The key elements of the matrix are:

- What is being monitored?
- Where is monitoring done?
- How is the parameter to be monitored to ensure meaningful comparisons?
- When or how frequently is monitoring necessary or most effective?
- Why is the parameter being monitored (what does it tell us about environmental impact)?

In addition to these questions, it is useful to identify the costs associated with monitoring (both investment and recurrent) and the institutional responsibilities.

When a monitoring plan is developed and put in place in the context of sub-project implementation, the implementing agency will request reports at appropriate intervals and include the findings in its periodic reporting to the World Bank and make the findings available to Bank staff during supervision missions.

### ***Part 2. Description of the Environmental Management Plan (EMP)***

*The Environmental Management Plan (EMP)* identifies feasible and cost-effective measures that may reduce potentially significant adverse environmental impacts to acceptable levels. The plan includes compensatory measures if mitigation measures are not feasible, cost-effective, or sufficient. Specifically, the EMP (a) identifies and summarizes all anticipated significant adverse environmental impacts; (b) describes--with technical details--each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate; (c) estimates any potential

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<sup>13</sup> As previously stated, the MERP project will not support any works that would trigger the Bank's Category A for environment.



environmental impacts of these measures; and (d) provides linkage with any other mitigation plans required for the sub-project.

**Monitoring.** Environmental monitoring during sub-project implementation provides information about key environmental aspects of the sub-project, particularly the environmental impacts of the sub-project and the effectiveness of mitigation measures. Such information enables the borrower and the Bank to evaluate the success of mitigation as part of sub-project supervision, and allows corrective action to be taken when needed. Therefore, the EMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the EA report and the mitigation measures described in the EMP. Specifically, the monitoring section of the EMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

**Capacity Development and Training.** To support timely and effective implementation of environmental project components and mitigation measures, the EMP draws on the EA's assessment of the existence, role, and capability of environmental units on site or at the agency and ministry level.<sup>3</sup> If necessary, the EMP recommends the establishment or expansion of such units, and the training of staff, to allow implementation of EA recommendations. Specifically, the EMP provides a specific description of institutional arrangements that is responsible for carrying out the mitigating and monitoring measures (e.g., for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training). To strengthen environmental management capability in the agencies responsible for implementation, most EMPs cover one or more of the following additional topics: (a) technical assistance programs, (b) procurement of equipment and supplies, and (c) organizational changes.

**Implementation Schedule and Cost Estimates.** For all three aspects (mitigation, monitoring, and capacity development), the EMP provides (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the EMP. These figures are also integrated into the total project cost tables.

**Integration of EMP with Project.** The borrower's decision to proceed with a project, and the Bank's decision to support it, are predicated in part on the expectation that the EMP will be executed effectively. Consequently, the Bank expects the plan to be specific in its description of the individual mitigation and monitoring measures and its assignment of institutional responsibilities, and it must be integrated into the project's overall planning, design, budget, and implementation. Such integration is achieved by establishing the EMP within the project so that the plan will receive funding and supervision along with the other components.

Resource: OP 4.01, Annex C - Environmental Management Plan.

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL>

**ENVIRONMENTAL MANAGEMENT PLAN CONTENT**

*Part 3. Environmental Management Plan Format*

Phase	Environmental Impact	Mitigating Measure(s)	Cost		Institutional Responsibility		Remarks
			Install	Operate	Install	Operate	
Construction	• • • •	• • • •					
Operation	• • • •	• • • •					
Decommissioning	• • • •	• • • •					

**ENVIRONMENTAL MANAGEMENT PLAN CONTENT**

*Part 4. Environmental Monitoring Plan Format*

Phase	What parameter is to be monitored?	Where will the parameter be monitored?	How will the parameter be monitored?	When will the parameter be monitored?	Why is the parameter being monitored?	Cost		Institutional Responsibility	
						<i>Install</i>	<i>Operate</i>	<i>Install</i>	<i>Operate</i>
<b>Baseline</b>									
<b>Construction</b>									
<b>Operation</b>									
<b>De-commissioning</b>									

## Annex D. Environmental Management Plan Checklist for Small Scale Construction and Rehabilitation Activities

### Part 1. Project Information

INSTITUTIONAL & ADMINISTRATIVE ARRANGEMENTS				
Country				
Project title				
Scope of project and activity				
Institutional arrangements (names and contacts)	WB (Project Team Leader)	Project Management	Local Counterpart and/or Recipient	
Implementation arrangements (Name and contacts)	Safeguard Supervision	Local Counterpart Supervision	Local Inspectorate Supervision	Contactor
SITE DESCRIPTION				
Name of site				
Describe site location	Attachment 1: Site Map [ ]Y / [ ]N			
Who owns the land?				
Geographic description				
LEGISLATION				
Identify national & local legislation & permits that apply to project activity				
PUBLIC CONSULTATION				
Identify when / where the public consultation process took place				
INSTITUTIONAL CAPACITY BUILDING				
Will there be any capacity building? (Yes/No)	[ ], if Yes, Attachment 2 includes the capacity building program			

**Beneficiary:**

**Signature:**

**Date:**

## Environmental Management Plan Checklist Template for Small Scale Construction and Rehabilitation Activities

### *Part 2. Safeguards Information*

<b>ENVIRONMENTAL /SOCIAL SCREENING</b>			
	<b>Activity</b>	<b>Status</b>	<b>Additional references</b>
Will the site activity include/involve any of the following:	A. Building rehabilitation	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section <b>B</b> below
	B. New construction	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section <b>B</b> below
	C. Individual wastewater treatment system	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section <b>C</b> below
	D. Historic building(s) and districts	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section <b>D</b> below
	E. Acquisition of land <sup>14</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section <b>E</b> below
	F. Hazardous or toxic materials <sup>15</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section <b>F</b> below
	G. Impacts on forests and/or protected areas	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section <b>G</b> below
	H. Handling / management of medical waste	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section <b>H</b> below
	I. Traffic and Pedestrian Safety	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section <b>I</b> below

<b>ACTIVITY</b>	<b>PARAMETER</b>	<b>MITIGATION MEASURES CHECKLIST</b>
<b>A. General Conditions</b>	Notification and Worker Safety	(a) The local construction and environment inspectorates and communities have been notified of upcoming activities
		(b) The public has been notified of the works through appropriate notification in the media and/or at publicly accessible sites (including the site of the works)
<b>B. General Rehabilitation and /or Construction Activities</b>	Air Quality	(c) All legally required permits have been acquired for construction and/or rehabilitation
		(d) All work will be carried out in a safe and disciplined manner designed to minimize impacts on neighbouring residents and environment.
		(e) Workers will comply with international good practice (always hardhats, as needed masks and safety glasses, harnesses and safety boots)
		(f) Appropriate signposting of the sites will inform workers of key rules and regulations to follow.
		(a) During interior demolition use debris-chutes above the first floor
	(b) Keep demolition debris in controlled area and spray with water mist to reduce debris dust	
Noise		(c) Suppress dust during pneumatic drilling/wall destruction by ongoing water spraying and/or installing dust screen enclosures at site
		(d) Keep surrounding environment (side-walks, roads) free of debris to minimize dust
		(e) There will be no open burning of construction / waste material at the site
		(f) There will be no excessive idling of construction vehicles at sites
		(a) Construction noise will be limited to restricted times agreed to in the permit

<sup>14</sup> The project will support construction of new buildings only in the case when land acquisition is not necessary and there are no any resettlement issues; for such cases the investor should have the landownership title as well as has to prove the land at the moment of sub-projects application is not occupied or used even illegally

<sup>15</sup> Toxic / hazardous material includes and is not limited to asbestos, toxic paints, removal of lead paint, etc.

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		(b) During operations the engine covers of generators, air compressors and other powered mechanical equipment should be closed, and equipment placed as far away from residential areas as possible
	Water Quality	(a) The site will establish appropriate erosion and sediment control measures such as e.g. hay bales and / or silt fences to prevent sediment from moving off site and causing excessive turbidity in nearby streams and rivers.
	Waste management	(a) Waste collection and disposal pathways and sites will be identified for all major waste types expected from demolition and construction activities. (b) Mineral construction and demolition wastes will be separated from general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers. (c) Construction waste will be collected and disposed properly by licensed collectors (d) The records of waste disposal will be maintained as proof for proper management as designed. (e) Whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos)
C. Individual wastewater treatment system	Water Quality	(a) The approach to handling sanitary wastes and wastewater from building sites (installation or reconstruction) must be approved by the local authorities (b) Before being discharged into receiving waters, effluents from individual wastewater systems must be treated in order to meet the minimal quality criteria set out by national guidelines on effluent quality and wastewater treatment (c) Monitoring of new wastewater systems (before/after) will be carried out
D. Historic building(s)	Cultural Heritage	(a) If the building is a designated historic structure, very close to such a structure, or located in a designated historic district, notify and obtain approval/permits from local authorities and address all construction activities in line with local and national legislation (b) Ensure that provisions are put in place so that artifacts or other possible “chance finds” encountered in excavation or construction are noted, officials contacted, and works activities delayed or modified to account for such finds.
E. Acquisition of land	Land Acquisition Plan/Framework	(a) If expropriation of land was not expected and is required, or if loss of access to income or damage to assets of legal or illegal users of land was not expected but may occur, that the bank Task Team Leader is consulted. (b) The approved by the Bank Land Acquisition Plan (if required by the project) will be implemented prior to start of project works.
F. Toxic Materials	Asbestos management	(a) If asbestos is located on the project site, mark clearly as hazardous material (b) When possible the asbestos will be appropriately contained and sealed to minimize exposure (c) The asbestos prior to removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust (d) Asbestos will be handled and disposed by skilled & experienced professionals (e) If asbestos material is be stored temporarily, the wastes should be securely enclosed inside closed containments and marked appropriately (f) The removed asbestos will not be reused
	Toxic / hazardous waste management	(a) Temporarily storage on site of all hazardous or toxic substances will be in safe containers labelled

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		<p>with details of composition, properties and handling information</p> <p>(b) The containers of hazardous substances should be placed in an leak-proof container to prevent spillage and leaching</p> <p>(c) The wastes are transported by specially licensed carriers and disposed in a licensed facility.</p> <p>(d) Paints with toxic ingredients or solvents or lead-based paints will not be used</p>
<b>G.</b> Affects forests and/or protected areas	Protection	<p>(a) All recognized natural habitats and protected areas in the immediate vicinity of the activity will not be damaged or exploited, all staff will be strictly prohibited from hunting, foraging, logging or other damaging activities.</p> <p>(b) For large trees in the vicinity of the activity, mark and cordon off with a fence large trees and protect root system and avoid any damage to the trees</p> <p>(c) Adjacent wetlands and streams will be protected, from construction site run-off, with appropriate erosion and sediment control feature to include by not limited to hay bales, silt fences</p> <p>(d) There will be no unlicensed borrow pits, quarries or waste dumps in adjacent areas, especially not in protected areas.</p>
<b>H.</b> Disposal of medical waste	Infrastructure for medical waste management	<p>(a) In compliance with national regulations the contractor will insure that newly constructed and/or rehabilitated health care facilities include sufficient infrastructure for medical waste handling and disposal; this includes and not limited to:</p> <ul style="list-style-type: none"> <li>▪ Special facilities for segregated healthcare waste (including soiled instruments “sharps”, and human tissue or fluids) from other waste disposal; and</li> <li>▪ Appropriate storage facilities for medical waste are in place; and</li> <li>▪ If the activity includes facility-based treatment, appropriate disposal options are in place and operational</li> </ul>
<b>I</b> Traffic and Pedestrian Safety	Direct or indirect hazards to public traffic and pedestrians by construction activities	<p>(b) In compliance with national regulations the contractor will insure that the construction site is properly secured and construction related traffic regulated. This includes but is not limited to</p> <ul style="list-style-type: none"> <li>▪ Signposting, warning signs, barriers and traffic diversions: site will be clearly visible and the public warned of all potential hazards</li> <li>▪ Traffic management system and staff training, especially for site access and near-site heavy traffic. Provision of safe passages and crossings for pedestrians where construction traffic interferes.</li> <li>▪ Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement</li> <li>▪ Active traffic management by trained and visible staff at the site, if required for safe and convenient passage for the public.</li> <li>▪ Ensuring safe and continuous access to office facilities, shops and residences during renovation activities, if the buildings stay open for the public.</li> </ul>

## Environmental Management Plan Checklist Template for Small Scale Construction and Rehabilitation Activities

### *Part 3. Example of an Environmental Monitoring Plan for small scale construction*

<b>PHASE</b>	<b>WHAT</b> is the parameter to be monitored?	<b>WHERE</b> is the parameter to be monitored?	<b>HOW</b> is the parameter to be monitored??	<b>WHEN</b> is the parameter to be monitored? (frequency)?	<b>WHY</b> is the parameter being monitored?	<b>COST</b>	<b>RESPONSIBILITY</b>
<b>Designing</b>	Implementation of EMP guidelines (RECOMMENDATIONS)	Design project for construction, reconstruction and adaptation.	Review of elaborates and adaptation designs.	Prior approval for construction as part of project monitoring program.	Recommended due to national legislation requiring a construction permit.	Should be part of the Project	MERP Designer, Contractor
<b>Construction</b>	Parameters given in construction permit - all special conditions of construction issued by different bodies	Main Project documentation	A part of regular inspection by the Ministry of Environment and the Construction Inspection	During construction and prior to issuance of the Operation permit	Regular review stipulated in the Law, and if any public complaint is sent to the Ministry of Environment, or the Construction Inspection.	Included in the construction phase, costs of Contractors	Supervision Engineer, inspectorate of the MERP and Construction Inspection
	Construction waste management (including hazardous)	Supporting documents for waste, which is submitted to the competent communal enterprise	A part of regular inspection by the Ministry of Environment, Construction Inspection	After reporting on waste management	Needed in accordance with the waste-related regulations	Expenditure of the Ministry of Environment and the Construction Inspection and low costs for the Contractor	Supervision Engineer, inspectorate of the MERP and Construction Inspection
<b>Operation</b>	Waste management	Based on the supporting documents for waste, which is submitted to the Ministry of Environment	Reports to the Ministry of Environment	After reporting to the Ministry of Environment on waste management.	Should be monitored in line with the regulations on waste management.	Costs of the project beneficiary and the Ministry of Environment	Project beneficiary, competent communal company and the MERP



**Annex E. Report on Consultation on the Draft EMF with Interested Parties****Date:** March 31, 2015**Venue:** Ministry of Education, Culture and Research, Chisinau

Location/venue	Objective	Invitees	Participants	Summary, conclusions and comments
Chisinau, Ministry of Education, Culture and Research	To introduce the MERP project and its components, including EMF and screening procedures, and solicit feedback	There were no personal invitations sent. The invitation to participate in the consultation was sent to the following institutions: <ul style="list-style-type: none"> <li>' Ministry of Education, Culture and Research</li> <li>' Ministry of Environment</li> <li>' State Ecological Inspectorate</li> <li>' Institute of Ecology and Geography</li> <li>' National Environmental Center (NGO)</li> <li>' World Bank Chisinau Office</li> </ul>	<ol style="list-style-type: none"> <li>1. Grosu Igor, Ministry of Education, Culture and Research, MERP project executive director</li> <li>2. Veverita Eugenia, MERP project coordinator</li> <li>3. Jovmir Ludmila, MERP</li> <li>4. Railean Vladimir, MERP</li> <li>5. Tataru Silvia, MERP</li> <li>6. Capcelea A., World Bank</li> <li>7. Bulimaga C., Institute of Ecology and Geography ASM</li> <li>8. Mustea M., National Environmental Center</li> <li>9. Podoroghin Inga, Ministry of Environment</li> <li>10. Popescu Tatiana, State Ecological Inspectorate</li> <li>11. Condrea Iurie, "IGC Construct" SRL, design company</li> <li>12. Grigoras Vitalie, Ministry of Education, Culture and Research</li> <li>13. Overcenco A., PRIM consultant</li> </ol>	<p>On the meeting, there were presentations on: (i) the Moldova Education Reform Project and its Components (presenter Veverita Eugenia), and (ii) the Environmental Management Framework and screening procedures for proposed project activities (presenter Overcenco Aureliu).</p> <p>The attendees actively participated in the discussions which were mainly focused on the proposed environmental screening procedures and checklists, and capability of MERP implementers to perform efficient environmental management and monitoring of sub-projects according to national and WB requirements. No concrete suggestion to modify the draft document have been provided and all participants agreed the EMF should be accepted.</p> <p>After the meeting the final version of the EMF was disclosed on the Ministry of Education, Culture and Research's website (<a href="http://www.edu.gov.md">www.edu.gov.md</a>) and submitted to the WB for its further disclosure in the Bank's external website.</p>

## **Annex F. Reference Documents for World Bank Operational Policies (OP) and Bank Procedures (BP)**

OP 4.01 Environmental Assessment

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/9367A2A9D9DAEED38525672C007D0972?OpenDocument>

BP 4.01 Environmental Assessment

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/C4241D657823FD818525672C007D096E?OpenDocument>

OP 4.04 Natural Habitats

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/71432937FA0B753F8525672C007D07AA?OpenDocument>

BP. 4.04 Natural Habitats

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/62B0042EF3FBA64D8525672C007D0773?OpenDocument>

OP 4.09 Pest Management

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/665DA6CA847982168525672C007D07A3?OpenDocument>

OP 4.11 Cultural Property

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/55FA484A98BC2E688525672C005BCBDB?OpenDocument>

OP 4.12 Involuntary Resettlement

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/CA2D01A4D1BDF58085256B19008197F6?OpenDocument>

BP 4.12 Involuntary Resettlement

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/19036F316CAFA52685256B190080B90A?OpenDocument>

OD 4.20 Indigenous Peoples

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/0F7D6F3F04DD70398525672C007D08ED?OpenDocument>

OP 4.36 Forests

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/C972D5438F4D1FB78525672C007D077A?OpenDocument>

BP 4.36 Forests

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/0AE075DC916559D985256C79000BDEF0?OpenDocument>

OP 4.37 Safety of Dams

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/C12766B6C9D109548525672C007D07B9?OpenDocument>

BP 4.37 Safety of Dams

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/D3448207C94C92628525672C007D0733?OpenDocument>

OP 4.76 Tobacco

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/DBE1A283D3BF9D078525672C007D075E?OpenDocument>

OP 7.50 Projects on International Waterways

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/5F511C57E7F3A3DD8525672C007D07A2?OpenDocument>

BP 7.50 Projects on International Waterways

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/47D35C1186367F338525672C007D07AE?OpenDocument>

OP 7.60 Projects in Disputed Areas

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/72CC6840FC533D508525672C007D076B?OpenDocument>

BP 7.60 Projects in Disputed Areas

<http://wbln0018.worldbank.org/Institutional/Manuals/OpManual.nsf/toc2/5DB8B30312AD33108525672C007D0788?OpenDocument>

**ANNEX G: List of agreed receiving schools to be rehabilitated by Ministry of Education, Culture and Research and MSIF (June 7, 2017)<sup>16</sup>**

No	Rayon	Locality	School name	No. students enrolled (Sept. 1, 2016)	No. students enrolled (May 31, 2017)	No. students transported and/or coming from other localities	No. students with special education needs (SEN)
<b>List of schools proposed for the project to be rehabilitated by MSIF</b>							
1.	Cimislia	Cimislia Town	Mihai Eminescu Lyceum	688	680	41	17
2.	Ungheni	Ungheni Town	Alexandru Puskin Lyceum	983	979	107	12
3.	Orhei	Orhei Town	Ion Luca Caragiale Lyceum	1147	1165	37	12
4.	Glodeni	Glodeni Town	Vasile Coroban Lyceum	487	483	6	11
5.	Telenesti	Telenesti Town	Mihai Eminescu Lyceum	642	642	115	20
6.	Anenii Noi	Anenii Noi Town	Mihai Eminescu Lyceum	931	917	155	16
7.	Straseni	Straşeni Town	Mihai Eminescu Lyceum	900	878	205	26
8.	Singerei	Pepeni village	A. Agapie Lyceum	839	831	69	28
9.	Vulcanesti	Vulcanesti Town	A. Doljenco Lyceum	810	797	98	8
10.	Ialoveni	Ialoveni Town	A. Vartic Lyceum	770	764	92	12
11.	Soroaca	Soroaca Town	P. Rares Lyceum	837	832	70	15
12.	Hincesti	Carpineni Village	S. Holban Lyceum	691	673	56	21
13.	Cahul	Colibasi Village	V. Alecsandri lyceum	675	656	67	14
14.	Stefan Voda	Stefan Voda Town	Stefan Voda Lyceum	599	599	175	1
15.	Rezina	Rezina Town	Alexandru cel Bun Lyceum	853	852	105	4
<b>List of hub schools to be rehabilitated by MOE with government financing</b>							
1	Nisporeni	Varzaresti Village	Alexandru cel Bun Gymnasium	334	332	58	10
2	Cantemir	Gotesti Village	Vasile Pirvan Lyceum	356	346	180	15
3	Calarasi	Sipoteni Village	Mihai Eminescu Lyceum	603	600	76	24
4	Leova	Iargara Town	Lucian Blaga Lyceum	375	375	42	15
5	Riscani	Costesti Town	S. Lucaci Lyceum	338	333	78	12
6	Causeni	Salcuta Village	M. Manole Lyceum	537	529	186	22
<b>Total Number of Students</b>				<b>14,395</b>	<b>14,263</b>		
<b>Average</b>				<b>685 students</b>	<b>679 students</b>	<b>14.1% from other localities</b>	<b>2.2% students with SEN</b>

<sup>16</sup> Pending approval of the Additional Financing, this list may be revised to include additional schools.