

SOUTH ASIA REGIONAL DEPARTMENT
SAUW Environmental Monitoring Report Log Sheet

Project title:	Greater Male Environmental Improvement and Waste Management Project		
Grant Number:		Project Number:	51077-002
Overall Project Description and Objectives	The objective of the project is to establish a sustainable solid waste management (SWM) system in the Greater Malé capital region and its inhabited outer islands by; (i) Establishing a modern waste collection, transfer, and disposal system, (ii) Improving community-based outer island waste management systems, (iii) Building institutional capacity for sustainable services delivery, and (iv) Raising public awareness in reduce, reuse, recycle (3R) behaviors.		
Approved Categorization		Category A	Category C
	x	Category B	FI
Loan Effectivity Date:		Frequency of Reporting	Semi-Annual
Project Officer	Luca Di Mario	Project Analyst	
Reporting Year	2020	Coverage Period	November 2020- April 2021
Date of PMU Submission to ADB	27 May 2021 06 Oct 2021 (revised version)	Date of ADB's feedback to PMU	8 July 2021 12 Oct 2021

Item	Findings in the SEMR/QEMR	Comments	Action/s Required	Response by PMU¹	Final Comments
A. Project Safeguards Team (check loan agreement and PAM requirements)					
PMU ² PIU ³	The PMU has assigned Mr. Mohamed Asif as the Social and Environmental Safeguards Specialist.	None.	None.		None.
Consultants	From the PMDSC Team, Mr. Abdul Aleem serves as the Environmental Safeguards Expert.	None.	None.		None.
Contractor	Designated Environmental Officer- Mamdhoo Ali	None.	None.		None.

¹ PMU to provide detailed response. This log sheet will be attached to the SEMR/QEMR and disclosed on ADB website.

² PMU – project management unit

³ PIU – project implementation unit

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B. Overall Project and Subproject Description (summarize number and type of packages) ⁴					
Number of Packages with civil works (check if consistent with latest procurement plan)	Four (4) Packages with Civil Works: CW/01 DBI/01 DBI/02 CW/03	Complied.	None.		Complied.
Number of DB/DBO packages and status	1 DBO: DBI/01 Transfer stations in Male and Villimale-Bid Evaluation is ongoing.	None.	None.		None.
Number of civil works packages and status	Four (4) Packages with Civil Works: CW/01- Contract signed on 21 Nov 2019. At 25% physical progress. DBI/02 and CW/03- Construction and Demolition (C&D) waste processing plant bid announced bidding on 21 May 2020. Concept design finalized for IWMCs. Draft bidding documents are under review.	None.	None.		None.
IEEs cleared for awarded packages?	Found in Section IV of the SEMR. CW/01 (with ongoing works)- The draft IEE disclosed on the	None.	None.		None.

⁴ DB/DBO – design-build or design, build, and operate or where contractor will finalize the detailed engineering design; civil works contract – sufficient details of the package is known and used as basis for bid/contract’s Technical Specification

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	website is considered as the final IEE as there were no significant changes to the detailed design.				
Safeguard documents disclosed on project website?	The links provided in Section IV are for disclosed IEEs in ADB website.	Links to project website disclosures were provided in previous SEMR.	None.		Links to project website disclosures were provided in previous SEMR.
SEMR information on implementation phase (bidding, on-going, construction, completed, under operation, others)	Implementation phase of each package were found in the SEMR.	Complied.	None.		Complied.
SEMR information on construction activities progress	Construction progress was indicated in the SEMR (i.e. CW/01 is at 25% physical progress.)	Complied.	None.		Complied.
C. Status of compliance with statutory clearances (check IEE for the complete list, summarize the findings for each package – obtained/under application and if obtained, specify validity period)					
Environmental Clearance (EC)	<p>Approved decision statements (DS) were received for all subprojects. Male Transfer station's DS has expired and application for renewal is being processed.</p> <p>Based on attachment, DS for Waste Transfer Station in Villingli Island has also expired in March 2021.</p>	See actions required.	<p>Provide the status of renewal of Villingli Transfer Station's DS.</p> <p>Male Transfer station's DS expired in 2018. Continue providing updates on the status of renewal of the DS in the next SEMR.</p> <p>Ensure that no construction works will commence without valid DSs.</p>	Vilingli Transfer Station DS renewed and approved by EPA. Will attach the new DS as an attachment to the SEMR. No construction works will be allowed to commence without a valid DS.	Confirmed. Renewal of DS is attached.
Forest Clearance	No other permits are reported as required.	None.	None.		None.
No Objection Certificate/Letter					
Site location clearance					

Item	Findings in the SEMR/QEMR	Comments	Action/s Required	Response by PMU ¹	Final Comments
Permit/Consent to Construct (or equivalent)					
Permit/Consent to Operate (or equivalent)					
Road-cutting permit					
Utilities shifting permit					
Tree-cutting permit					
Others (specify)					
D. Status of Compliance with grant agreements/covenants <i>(verify items in SEMR with project loan agreement)</i>					
Schedule 4 - 2 Environment The Recipient, through MOFT and MEE, shall ensure that the preparation, design, construction, implementation, operation and decommissioning of the Project and all Project facilities comply with (a) all applicable laws and regulations of the Recipient relating to environment, health and safety; (b) the Environmental Safeguards; (c) the EARF, and (d) all measures and requirements set forth in the IEEs, the EMPs, and any corrective or preventative actions set forth in a Safeguards Monitoring Report.	Being complied.	None.	None.		None.
Schedule 4 – 4 Human and Financial Resources to Implement Safeguards Requirements The Recipient shall make available or cause MOFT to make available necessary budgetary and human resources to fully implement the EMPs	Being complied.	None	None		None
Schedule 4 – 5 Safeguards-Related Provisions in Bidding Documents and Works Contracts A- comply with the measures relevant to the contractor	Status of compliance is provided. All bidding documents will have the IEE included and	None	None		None

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<p>set forth in the IEE and the EMP, and any corrective or preventative actions set forth in a Safeguards Monitoring Report;</p> <p>B- make available a budget for all such environmental measures; and</p> <p>C- provide the Recipient with a written notice of any unanticipated environmental, resettlement or indigenous peoples risks or impacts that arise during construction, implementation or operation of the Project that were not considered in the IEE and the EMP.</p>	<p>compliance will be ensured by the safeguard specialist</p>				
<p>Schedule 4 – 6 Safeguards Monitoring and Reporting</p> <p>A- submit semiannual Safeguards Monitoring Reports to ADB and disclose relevant information from such reports to affected persons promptly upon submission;</p> <p>B- - If any unanticipated environmental and/or social risks and impacts arise during construction, implementation or operation of the Project that were not considered in the IEEs and the EMPs, promptly inform ADB of the occurrence of such risks or impacts, with detailed description of the event and</p>	<p>Status of compliance is provided.</p> <p>Discussion on COVID-19 exposure incident and actions taken were provided in the SEMR.</p>	<p>None.</p>	<p>None.</p>		<p>None.</p>

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<p>proposed corrective action plan; and</p> <p>C- Report any actual or potential breach of compliance with the measures and requirements set forth in the EMPs promptly after becoming aware of the breach.</p>					
<p>Schedule 4 – 7</p> <p>Prohibited List of Investments</p> <p>The Recipient, through MOFT and MEE, shall ensure that no proceeds of the Grant are used to finance any activity included in the list of prohibited investment activities provided in Appendix 5 of the SPS.</p>	Being complied	None	None.		None
<p>Schedule 4 – 8</p> <p>Labor Standards, Health and Safety</p> <p>F- disseminate, or engage appropriate service providers to disseminate, information on the risks of sexually transmitted diseases, including HIV/AIDS, to the employees of contractors engaged under the Project and to members of the local communities surrounding the Project area, particularly women.</p>	Included in bidding documents and contracts	None	None		None
<p>Schedule 4-9</p> <p>The Recipient, through MOFT and MEE, shall strictly monitor compliance with the requirements set forth in paragraph 8 above and provide-ADB with regular reports.</p>	Report says “Will be complied.”	None	None		None
E. Contractors Compliance with Environmental Safeguards Requirements					
<p>Appointment of Environment, Health and Safety (HSE) and/or nodal person</p>	The nodal person for CW/01’s environmental safeguards is Mamdhoo Ali.	Complied.	None.		Complied.
<p>Submission of site-specific EMPs</p>					

Item	Findings in the SEMR/QEMR	Comments	Action/s Required	Response by PMU ¹	Final Comments
Submission of SEMP implementation report (<i>specify in comments frequency – daily, weekly, monthly or quarterly basis</i>)	<p>According to the SEMR, CEMP was prepared by contractor and approved. CEMP and OHS Plan are attached in the appendices. Contractor's environmental monitoring report (air quality, water quality, groundwater quality and noise) is also attached.</p> <p>Overall compliance with CEMP was described as satisfactory.</p>	No information on Contractor's CEMP/OHS Plan implementation report submission.	<p>Please confirm if the Contractor submits inspection checklists/contractor reports on CEMP/OHS Plan implementation. Indicate the frequency of submission to PMU/PMDSC and discuss a summary of information in the report (such as Contractor's toolbox meetings/safety inductions conducted, site environment, health and safety inspections, and incidents statistics, etc.). Attach sample copies of contractor's CEMP/OHS Plan implementation reports during the reporting period and filled-out inspection checklists by the Contractor. Provide explanation if this was not done.</p> <p>PMU/PMDSC must ensure that Contractor submits the required reports in the next reporting periods.</p>	<p>As per the OHS plan the contractor would submit a site safety inspection form, however, due to the outbreak of COVID19 there was a shortage of man power on site to conduct the inspection. However, environmental monitoring reports were prepared and submitted. CEMP/OHS plan implementation inspection checklists will be submitted on the next reporting period. CEMP implementation is monitored through the contractor's environmental monitoring reports which are submitted as attachments to this SEMR. PMU will ensure in the next reporting period that all reports are submitted on time by the contractor.</p>	Noted. In the next SEMR, please ensure to provide information on the CEMP, including report on its implementation.
Site verification by PMU, PIU, or consultants (<i>verification report should be attached to the SEMR</i>)	The SEMR provides no information about site verifications by the PMU/PMDSC.	We noted from the report about the COVID-19 incidents from March- April 2021.	Confirm if the PMDSC conducted site inspections during the reporting period, at least from November 2020 to February	PMDSC conducts site inspections regularly. November to February Site inspection reports attached.	Noted.

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			<p>2021. Attach site inspection reports by the PMDSC. If not conducted, please provide explanation.</p> <p>Ensure that PMDSC conducts site inspections on a regular basis (monthly per attached CEMP) and provide signed site verification/inspection checklists/reports in the next SEMR.</p>		
SEMR compliance matrix on mitigation measures implementation (matrixes are based on approved SEMP)	SEMR compliance matrix based on the approved EMP and remarks on implementation at the site are presented.	The basis of EMP implementation at the site is unclear. There are no checklists/contractor report nor PMDSC reports discussed/ found in the SEMR. Per attached CEMP, the Contractor is to monitor on site EHS on a daily basis, and the PMDSC is to conduct monthly site visits.	<p>Discuss the basis of EMP implementation assessment. Contractor should begin conducting daily site inspections and PMDSC to conduct monthly site inspections per attached CEMP.</p>	PMDSC site inspection reports attached.	Noted. However, the inspection report prepared by PMDSC is purely set of photos and results of testing. In the next SEMRs, please provide discussions on every site visit, including analysis of the results of sampling activities.
Other information					
F. Environmental Monitoring					
Rationale					
Parameters to be monitored are commensurate to the impacts, mitigation measures, and project/subproject/package Sampling locations identified and appropriate	Standards used were discussed (EU directives, WHO guideline values, ANZECC, 2000, EPA)	The values of standards used need to be provided to determine the project's performance. ADB SPS 2009 requires the	Present the standard values used for air quality, water quality and noise (based on EU directives, WHO guideline values,	The standard values used for AQ, WQ and noise presented on the revised document.	Noted. In the next reporting periods, please ensure to use proper units of measure for the results of

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<p>Sampling frequency identified and appropriate</p> <p>Sampling collection and analysis are in accordance with internationally-accepted practices</p> <p>Standards and performance indicators are compliant with ADB SPS requirements⁵ (provide justification if less stringent standards are used)</p>	<p>but the values are not presented.</p> <p>The monitoring parameters and locations were listed in the report/presented in the Contractor's report (attached). Some parameters were (air quality, water quality) not tested.</p> <p>The results provided in the report represent one-day sampling or monitoring. Attached Contractor's report provided sampling results for November 2020, January 2021 and April 2021.</p>	<p>adoption of the more stringent standard, otherwise, justification has to be provided.</p> <p>It seems like there are still gaps in environmental monitoring in terms of frequency (monthly) and parameters monitored (air quality, water quality) and it was noted that some water quality parameters cannot be tested in the Maldives during the reporting period. Environmental monitoring (i.e. air quality, water quality and noise) are not done on a monthly basis per monitoring program in the approved IEE.</p>	<p>ANZECC, EPA) in table format together with the monitoring results for all stations and months during the reporting period (including Contractor's monitoring results).</p> <p>Discuss if the standards used meet the ADB SPS requirements (refer to the the approved IEE for the applicable standards on air and noise). Provide a justification if less stringent standards are used. Discuss if the results comply with the appropriate standards.</p> <p>Please provide the reason for the gaps and discuss how the PMU plans to comply with the gaps in environmental monitoring in terms of (i) frequency and (ii) parameters per approved IEE/EMP.</p> <p>In the next reporting period, provide monthly environmental monitoring results for</p>	<p>Discussions provided separately for AQ, WQ and Noise reg the compliance of the results to the standards.</p> <p>The PMU is trying to understand the difficulties the contractor is facing regarding the monitoring frequency. And regarding the monitoring parameters, PMU is exploring other options for laboratory water testing.</p>	<p>environmental sampling activities. For example, the unit used for results of ambient air quality sampling as indicated in the main body of the report is mg/l, while in the attached inspection report says it is in ppm. This kind of inconsistency should be corrected in the next SEMRs.</p> <p>To reiterate, in the next reporting period, please conduct monitoring based on the monitoring plan and monitoring parameters per approved IEE. If there are deviations or inability to monitor required parameters, please provide corresponding justification.</p>

⁵ ADB SPS (Appendix 1 para 33) requires projects to apply pollution prevention and control technologies and practices consistent with international good practices as reflected in internationally recognized standards such as the World Bank Group's Environmental, Health and Safety Guidelines (<https://www.ifc.org/ehsguidelines>). These standards contain performance levels and measures that are normally acceptable and applicable to projects. When host country regulations differ from these levels and measures, the borrower/client will achieve whichever is more stringent. If less stringent levels or measures are appropriate in view of specific project circumstances, the borrower/client will provide full and detailed justification for any proposed alternatives that are consistent with the requirements presented ADB SPS.

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			all parameters per approved IEE.		
G. Environmental monitoring results (narrative based on presented results)					
Air quality results	According to the report, the results for air quality are within the maximum concentration limit per EU Air Quality Directive. For Water Quality, parameters- pH, Temperature, turbidity and total suspended solids are well within the optimum range per standards used. For Noise- day time noise is high.	Standards/performance indicator values (except for water quality) were not indicated.	Indicate the standard values in comparison with the results. Please refer to the approved IEE for the applicable standards on air and noise.	Discussions provided separately for AQ, WQ and Noise reg the compliance of the results to the standards.	Noted. Please refer to final comments above.
Water quality results					
Noise quality results					
Others	n/a				
H. Consultations and/or FGDs during the reporting period					
Number	No consultations were conducted as it was discouraged by the Health Protection Agency.	Meaningful consultation throughout project implementation is a requirement of the ADB SPS 2009.	In the next reporting periods, conduct meaningful consultation activities following COVID-19 health and safety measures and health regulations, and report on the same in the SEMRs.		In the next reporting periods, conduct meaningful consultation activities following COVID-19 health and safety measures and health regulations, and report on the same in the SEMRs.
Reason/s for consultations/FGDs					
Number of participants					
Number of female participants					
I. Trainings, Workshops, Seminars during the reporting period					
Number	No trainings/workshops were conducted following Health Protection Agency.	Please see actions required.	In the next reporting periods, conduct trainings on environmental safeguards while observing COVID-19 health and safety measures and		In the next reporting periods, conduct trainings on environmental safeguards while observing COVID-19 health and safety measures and
Topics					
Number of participants					
Number of female participants					

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			following health regulations, and report on the same in the SEMRs.		following health regulations, and report on the same in the SEMRs.
J. Grievance Redress Mechanism					
GRM per PAM or IEE/EARF established	GRM is active and is ready to receive complaints. For Thilafushi, there is no island council, however, it is part of the City council (first tier). The PMU serves as the second tier. GRM notification is done through the Ministry of environment, Climate Change and Technology website.	None.	Provide discussion on any capacity development (trainings, workshops, briefings) conducted for GRM members in the past.	No trainings / workshops conducted for GRM members yet. However at the PMDCSC survey trips, the council offices on all islands were given briefings about the GRM. We will be arranging further capacity development activities in the future.	Noted. Please ensure to undertake the capacity development activities and include report/discussions in succeeding SEMRs.
GRM notified via publication or notice boards					
GRM members identified					
GRM members have capacity to address project-related complaints (detailed information on capacity development of GRM members such as trainings, workshops, briefings, etc should be attached in the SEMR)					
Number of meetings conducted (attach minutes of the meeting)					
K. Complaints Received (detailed information on nature of complaints, summary and status of resolution)					
Number of complaints	No complaints received during the period.	N/A	None.		None.
Nature (provide summary of issues/concerns)					
Status of resolution					
L. Summary of Issues and Corrective Actions					
Major issues/concerns (specify)	No environmental safeguard issues were reported in the SEMR except the case of COVID-19 exposure.	See action required.	Discuss necessary improvements in the existing COVID-19 SOPs and/or its implementation, if any, and whether the improvements have already been initiated/implemented. Provide a discussion in this report or in the next monitoring report.		Discuss necessary improvements in the existing COVID-19 SOPs and/or its implementation, if any, and whether the improvements have already been initiated/implemented. Provide a discussion in this report or in the next monitoring report.
Corrective Action to be implemented, timeline, responsible person/s, and budget are clearly specified					
M. Status of Corrective Action Plan from Previous Reporting Period (list all and provide status)					

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Ensure to conduct monitoring as per approved IEEs, as the minimum.	Gaps in environmental monitoring are still observed.	Gaps in environmental monitoring are still observed.	Please provide reason for the gaps, and discuss how the PMU plans to comply with the gaps in environmental monitoring in terms of (i) frequency and (ii) parameters per approved IEE/EMP.	The PMU is trying to understand the difficulties the contractor is facing regarding the monitoring frequency. And regarding the monitoring parameters, PMU is exploring other options for laboratory water testing.	Noted. To reiterate, in the next reporting period, please conduct monitoring based on the monitoring plan and monitoring parameters per approved IEE. If there are deviations or inability to monitor required parameters, please provide corresponding justification.
N. Appendixes					
Photos	Included in the appendix		In the next SEMR, continue to provide photos of all site inspections/visits conducted during the reporting period. Please indicate geographic locations (coordinates) and provide captions that will describe the photos.		In the next SEMR, continue to provide photos of all site inspections/visits conducted during the reporting period. Please indicate geographic locations (coordinates) and provide captions that will describe the photos.
Summary of consultations	Not found in the report.		In the next SEMRs, continue to attach photos, attendance sheets and summary of consultations.		In the next SEMRs, continue to attach photos, attendance sheets and summary of consultations.
Copies of environmental clearances and permits	Expired DSs for transfer stations are attached.		Please provide copies of DS renewal applications for the two transfer stations.	Renewed DS for Vilimale TS attached. Male TS DS was expired. This EIA needs to be updated and resubmitted to EPA. As this is a Design Build project, the EIA will	Noted. Renewal of DS is attached.

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				be updated once the design is finalized. We will ensure that the physical works/construction starts only after we receive the DS for the EIA.	
Site EMPs	CEMP and OHS Plan are attached.		None.		
Checklists	Not found in the report		Please attach the Site verification/inspection checklists/ reports by the PMDSC.	Attached	Noted. However, the inspection report prepared by PMDSC is purely set of photos and results of testing. In the next SEMRs, please provide discussions on every site visit, including analysis of the results of sampling activities.
O. Other Issues					
Revised SEMR Nov 2020-April 2021 (submitted 16 Jul 2021)	Results of air quality monitoring were presented and the WHO guideline values for ambient air quality in the IFC/WB General EHS Guidelines were used as reference. Air quality measurements were taken using handheld air quality monitoring devices (Aeroqual Series 500). NO ₂ , PM ₁₀ , PM _{2.5} and CO ₂ levels were measured at the Harbor rehabilitation site. 15-minute averages	WHO ambient air quality guideline values are for 24-hour/1-hr sampling, to be sampled off-site or at the fence line.	In the next reporting period, please ensure that ambient air sampling methods and location of sampling are acceptable for comparison with standards/guideline values being used.		In the next reporting period, please ensure that ambient air sampling methods and location of sampling are acceptable for comparison with standards/guideline values being used.

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	were taken for each parameter.				
	Groundwater quality monitoring is conducted, and results are presented.	Standards used are the indicative guideline values for treated sanitary wastewater discharges from the IFC-WBG EHS Guidelines (Table 1.3.1).	In the next monitoring report, please discuss the purpose of groundwater quality monitoring being conducted in the next SEMR.		In the next monitoring report, please discuss the purpose of groundwater quality monitoring being conducted in the next SEMR.
	<p>Marine water samples were tested for various parameters and results were compared with ANZECC and EPA standards.</p> <p>Some parameters required per approved EMP were not tested.</p>	See actions required.	<p>In the next monitoring report, please explain/discuss the context of using ANZECC, 2000 and EPA standards and the optimum ranges presented.</p> <p>In the next reporting period, please test for required parameters per approved EMP.</p>		<p>In the next monitoring report, please explain/discuss the context of using ANZECC, 2000 and EPA standards and the optimum ranges presented.</p> <p>In the next reporting period, please test for required parameters per approved EMP.</p>
	Noise monitoring was conducted at the project site. Off-site noise monitoring results were presented in the attached Contractor's Environmental Monitoring Report.	<p>The occupational health and safety noise limits for various working sites (Table 2.3.1 of the IFC-WBG General EHS Guidelines) must be used for comparison with project site noise.</p> <p>Noise results in the contractor's report were not compared against a particular standard/reference.</p>	<p>Use the appropriate guideline values/limits for noise at the project site (i.e. for Heavy industry, Table 2.3.1 of the IFC-WBG General EHS Guidelines).</p> <p>In the next reporting period, please include the results of the contractor's ambient noise monitoring in the main report and compare the results with the noise level guideline values per IFC-WBG, Table 1.71. (Reference: Guidelines for Community Noise,</p>		<p>Use the appropriate guideline values/limits for noise at the project site (i.e. for Heavy industry, Table 2.3.1 of the IFC-WBG General EHS Guidelines).</p> <p>In the next reporting period, please include the results of the contractor's ambient noise monitoring in the main report and compare the results with the noise level guideline values per IFC-WBG, Table 1.71. (Reference: Guidelines for Community Noise,</p>

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			World Health Organization (WHO), 1999.). Indicate whether the receptor at the sampling station is residential, commercial, etc.		World Health Organization (WHO), 1999.). Indicate whether the receptor at the sampling station is residential, commercial, etc.
	Contractor's ambient air quality monitoring results were presented in parts per million (ppm).	Contractor's monitoring results are too high when converted from ppm to ug/m3 (i.e. equivalent to x10 ⁶ ug/m3).	Please check if the unit used is correct.		In the next reporting periods, please ensure to use proper units of measure for the results of environmental sampling activities. For example, the unit used for results of ambient air quality sampling as indicated in the main body of the report is mg/l, while in the attached inspection report says it is in ppm. This kind of inconsistency should be corrected in the next SEMRs.
Reference/s					
<ol style="list-style-type: none"> 1. 5th SEMR for GMEIWMIP Nov 2020-April 2021, submitted 27 May 2021 2. 5th SEMR for GMEIWMIP Nov 2020-April 2021, revision submitted 06 Oct 2021 3. Initial Environmental Examination March 2018 MLD: Greater Malé Environmental Improvement and Waste Management Project – Improvement of Waste Handling and Processing Facilities for Thilafushi Island (Construction and Demolition Waste Plant, End-of-Life Vehicle Dismantling Workshop, Waste Vessel Harbor Improvements, and Administration Building) 4. Project Administration Manual, Project Number 51077-002, Republic of Maldives: Greater Malé Environmental Improvement and Waste Management Project 5. Grant Agreement, 16 August 2018 					