

Comments on EMP (Package-05 & 05 (A)) Component B-2

The overall Environmental Management Plan (EMP) for all packages is well prepared document, however; the whole EMP needs some important changes for proper implementation of EMP. The Proposed are as under:

1. Abbreviations may be revised as per used in EMP.
2. Definitions of terms of Social Action Plan (SAP) and in Resettlement Action Plan (RAP) analogously have been used in EMP, instead of proper EMP definitions, which needs to be revised.
3. The objectives of EMP may be enhanced with following objectives:

Objectives of EMP

4. Revealed objectives of EMP limited and does not vie the mentioned activities in the EMP. Purpose of EMP implementation is ensuring the sustainable use of natural resources such as farming, agricultural, fishing and improve efficiency of water management with the perspective proper use of natural resources. Therefore, the objectives may be revised and following points may be incorporated:
 - (a) Maintaining essential ecological process, preserving biodiversity and where possible restoring degraded natural resources.
 - (b) Managing community and infrastructure resources and giving priority to conserving and improving the ecosystem without endangering habitats and the wider environment.
 - (c) Studying the ecology of catchment and initiating measures for environmental protection and rehabilitation of affected areas.
 - (d) Initiating actions to strengthen local community involvement in the design and implementation of minor/Distributary rehabilitation and development.
 - (e) Strengthening institution involved with natural resources use and conservation so that the institutions are better able to undertake their responsibilities
 - (f) Maximize potential project benefits and control potential negative impacts.
 - (g) Comply with all relevant applicable environmental regulations related to pollution control, waste management and environmental quality.
5. A full description of the site and ecological assets, Natural conservation values; the ecosystem characteristics, biodiversity of the each Minor/Distributary is neglected. Accordingly, the preparatory chapter to the plan may be revised. Maps have been drawn on A-4 size page; the size of maps should be revised and may be drawn on A-3 size paper.

General abstract is adhered on maps and is not visible to reading, which may be enlarged and attached sperataly.

6. Justification for EMP has not also been depicted, which should be stated in terms of needs and benefits to be gained from EMP.

Environmental Management Monitoring Plan

7. The chapter 5 headed by “*Environmental Management Monitoring Plan*”, which should be captioned as “*Environmental Management Mitigation and Monitoring Plan*” and activities should be more specific to mitigation measures (or Implementation status), because monitoring activities will also be covered parallel with mitigation measures.

Furthermore, M&E consultants for WSIP will also persist on same activities i.e. Monitoring (Either compliance or effect/changes). And will also evaluate the implementation performance of EMP. Consequently based on Monitoring Compliance or effect/changes) EMP will be revised, where it will be necessary.

9. At table 5.1 Serial number 01 under the sub-heading of Surface Water Quality, Monitoring parameters of water quality are missed. Type of parameters should be proposed. However, in the operational phase at serial number 03 under the sub-heading of Surface Water Quality monitoring parameters are mentioned.

Same error has recurring at table 5.1 Serial number 02 under the sub-heading of Ground Water Quality,

10. It is pointed out at 5.8 that daily meetings may be arranged. It seems impractical and unworkable, In this regard it is suggested that Monthly meeting should be arranged between all stakeholders i.e. PD-WSIP, EMU-WSIP, PICs, M&Ec and other relevant person or agency to review progress/ implementation status of EMP and other environmental (Physical, Biological and Social) aspects of the project.
11. At 5.11 mentioned regarding “*Social Complaints Register*” the said heading should swap with “*Environmental Complaints Register*”. On the basis of environmental complaints Mitigation and Monitoring activities will formulate.

Communication and information Disclosure

12. It has been mentioned in chapter 06 of cited heading that the EMP was shared with representative of various stakeholders of package-5 also participated. It is imperative to note that Walk Through Survey (WTS) was conducted in mentioned dates; however these minors and distributaries were re-visited for Environmental investigation. Therefore, date of disclosure of EMP to the community may indicate obviously, because EMP has been issued in July 2010 and disclosed to community in December, 2009.

Furthermore, in *Key Issues Discussed*” in Table 6.1, wherein none of environmental issues has been pointed out except borrow pits.

13. The mechanism of Communication and information Disclosure may also define.

Cost Estimate

14. The cost of EMP package-05 is shown Rs. 2,360, 360, equivalent to US \$ 27, 768.94, divided in to three phases, without providing details of expenditures. For example Rs. 15000 unit cost has been allocated to Water quality (Surface and Ground) without mentioning water quality parameters.
15. Similarly, it is mentioned that 2485 saplings will be planted at the cost of Rs. 1485781.5 (unit cost will be Rs. 119.58), no details have provided in expenditure (Cost of per sapling, cost of excavation, cost of watering (equipments, Labour charges, and other cost).
16. The cost estimate of package-05 (A) is mentioned Rs. 190850.84, which seems high. Therefore, the cost expenditure of EMP should be submitted in details.

Furthermore, it is also an ambiguity that EMP will be implementing separately or it will part of document contract. It should be clarified.

Appendixes

19. Appendix C is reflecting “*Tree Plantation Plan*” however; it is not clear and no technical specification for plantation has been provided.

As per Appendix C para iv that FO will plant 05 saplings for every cut tree. This seems not practicable because tree plantation should be included in Contract Document and Contractor has to be responsible for plantation and replacement of dead saplings watering and protection up to the maintenance period.

After completion of maintaining period, responsibility should be given to FO for maintenance of Plantation.

20. The inventory of tree has been provided alongwith Appendix C, which should be provided in initial chapter of EMP.
21. Appendix D, E, and G should also be included in contract Document.

Akbar Ali Khatian
Ecologist EMU-WSIP
SIDA Hyderabad.