WORLD BANK FINANCED
LOG IN GEORGIA PROJECT
(P169698)

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

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Contents

LIST OF ACRONYMS

ComCom	Georgia National Communication Commission
EA	Environmental Assessment
EHS	Environmental, Health and Safety
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESR	Environmental and Social Review
ESS	Environmental and Social Standards
GIIP	Good International Industry Practice
GNI	Gross National Income
GoG	Government of Georgia
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HLD	High Level Design
IDP	Internally Displaced Person
IBRD	The International Bank for Reconstruction and Development
ICT	Information and Communications Technology
IRU	Indefeasible Rights of Use
ISP	Internet Service Provider
LMP	Labor Management Procedures
MEPA	Ministry of Environmental Protection and Agriculture
MoILHSA	Ministry of IDPs from the Occupied Territories, Labor, Health and Social Affairs
NACHP	National Agency for Cultural Heritage Preservation
NGO	Non-Governmental Organization
PAP	Project-Affected Persons
POM	Project Operations Manual
PoP	Point of Presence
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
TOR	Terms of Reference
UNDP	United Nations Development Programme
YNEET	Youth Not in Employment, Education, or Training

1. Introduction

Since 2013, the Government of Georgia has prioritized support to innovation and use of technology across the economy in order to increase the internet access for its citizens and build digital skills among the young people and students. Private sector also plays a huge role in this regard. Access to the broadband internet has been developing steadily with around 67% of the households subscribing to the fixed broadband services. However, when it comes to comparing urban and rural areas, we notice a big difference. When urban households' connectivity reaches 83%, this number drops to just 52% for rural areas, wireless network covers most of the households in the rural areas, but the speeds that they provide are insufficient for today's demands. The government of Georgia's program for broadband infrastructure development (Open Net Program) aims to address these issues by connecting those rural areas currently underserved by the private sector.

Open Net is a non-entrepreneurial, non-profit legal entity established by the Innovation and Technology Agency of the Ministry of Economy and Sustainable Development (MoESD). Open Net prepared Log In Georgia Project to be implemented with the World Bank Support. The Project was approved on August 31, 2020and became effective on December 28, 2020. In 2025, the government requested [and the World Bank provided] additional financing (AF) for Project implementation to extend the coverage and improve reliability of broadband service provision Present Environmental and Social Management Framework (ESMF) was prepared for the original Project and updated upon the provision of AF. It is an integral part of the Project Operations Manual (POM) developed for the purposes of the Log In Georgia Project. The ESMF identifies a range of required environmental and social management measures that need to be taken during the planning, design, construction and operation activities under Log in Georgia Project, to ensure compliance with the national legislation and the World Bank's Environmental and Social Standards relevant for the Project.

This ESMF provides general policies, guidelines, codes of practice and procedures to be integrated into the implementation of the Log in Georgia Project. It lays out step-by-step instructions for environmental screening, classifying, appraising, approving and monitoring individual subprojects under Log in Georgia Project. The ESMF also reviews environmental and social policies and legal framework of Georgia and environmental and social standards of the World Bank and their relevance to the Project; includes institutional and capacity assessment related to environmental and social risk management; and describes the principles, objectives and approach to be followed while designing site-specific environmental and social mitigation measures.

2. Project Context

Log In Georgia Project is designed to support the Government of Georgia's objectives to extend access to the entire population of the country and integrate citizens of Georgia into the national

and global digital economies. Through a combination of funding from the International Bank for Reconstruction and Development (IBRD) and counterpart financing, the Project supports activities in rural areas across Georgia that: (1) extend access to affordable broadband internet services in targeted settlements; and (2) promote its use by individuals and enterprises.

3. Development Objective, Expected Results, and Design of the Log in Project

3.1 Project Development Objective

The Project Development Objective is to increase access to affordable broadband internet, and to promote its use by individuals and enterprises, in targeted rural settlements.

Result indicators include:

Objective	**Results indicator**
Increased access	1. People provided with access to broadband internet (number [Thousand])
Improved affordability	2. Availability of affordable broadband subscription packages (Percentage)
Promoting use	3. Share of individuals in targeted rural settlements using Internet for specific purposes[1] (percentage) a. Of which, female (percentage) b. Of which, persons with disabilities (percentage) 4. Share of enterprises in targeted rural settlements using internet for specific purposes[2] (percentage) a. Of which, women-owned enterprises

3.2 Project Design

The Log In Georgia Project consists of three components described below:

Component 1: Increasing access to broadband

[1] Simple average of the share of individuals surveyed in the Project areas that report using the Internet for the following purposes: Seeking health-related information; Finding information about goods or services; Looking for a job or sending a job application; Internet Banking.

[2] Simple average of the share of surveyed enterprises (with one or more employees) in Project areas that report using the internet for specific purposes: Had a website; Submit completed forms electronically (e.g. forms for customs or VAT declaration); Declare VAT completely electronically without the need for paperwork (including electronic payment, if required); Receiving orders via Web page for goods or services.

This Component will help expand access to broadband internet in rural settlements across Georgia and improve the enabling environment for digital development. Subcomponent 1.1 will support the Government's Open Net Program, which seeks to expand access to broadband services for targeted rural settlements. Subcomponent 1.2 will finance activities to enhance the enabling environmental for Georgia's digital infrastructure development.

Subcomponent 1.1: Supporting the Open Net Program

The Government's Open Net Program aims to develop infrastructure to offer national open access, wholesale, broadband telecommunications services. The Open Net Program will fill the existing and persistent gap in middle-mile broadband infrastructure that will not be filled by private investment alone within a reasonable period. This infrastructure will provide open access wholesale connectivity to any authorized (third-party) electronic communications service provider at an open access point of presence (PoP) in that settlement. Access will be provided at regulated prices, as defined by the Georgian National Communications Commission (ComCom). Those service providers will then provide the services on commercial terms through their own last-mile infrastructures, to the settlements' households, enterprises, and organizations. The Program will thus allow subprojects to expand and improve access to broadband internet in rural areas. In this way, the Open Net Program will extend access to broadband internet to settlements (villages and towns) across Georgia at the same quality and effective prices per unit as available in the capital.

This subcomponent will finance the design, building and installation, and activation of infrastructure in up to 800 settlements identified by the ComCom as eligible for being connected by the ON network (of a total of 2,500 settlements across Georgia). The network deployment will be phased based on objective criteria, including technical feasibility and assessment of demand in coordination with service providers. The Open Net will include sections that are newly constructed and, where suitable existing infrastructure exists, the program will use that infrastructure either through leasing of capacity or the purchase of indefeasible rights of use (IRUs).

Subcomponent 1.2: Improving the enabling environment for digital infrastructure

This subcomponent will support activities to improve the enabling environment for digital infrastructure development in Georgia. This includes support to develop the legal, policy, and regulatory instruments, and design of investment attraction measures included in the action plan of the national broadband development strategy (adopted in 2020). The subcomponent will finance activities to design and implement legal and policy reforms, and to support institutional coordination to support digital infrastructure development. It will also include technical assistance to design and implement regulatory reforms, as well as the development of IT systems and institutional mechanisms to support their implementation, including those for broadband cost reduction. The subcomponent will also include support to engage with foreign and private investors to attract investments into and develop Georgia's telecommunications infrastructure.

Component 2: Promoting the use of broadband-enabled digital services

This Component will support the development of Georgia's digital economy through a strengthened enabling environment, promoting digital use-cases of broadband, and addressing barriers to the participation of individuals in the digital economy. Subcomponent 2.1 will strengthen the enabling environment to develop Georgia's digital economy. Subcomponent 2.2 will identify and promote broadband-enabled digital use-cases to help solve meaningful problems in the targeted settlements and for specific user-groups. Subcomponent 2.3 will support activities that ensure the digital inclusion of specific groups of individuals that are at risk of missing out on digital opportunities.

Subcomponent 2.1: Enabling environment for digital economy development

This subcomponent will support activities to improve the enabling environment for digital economy development in Georgia. This includes support to develop the legal, policy, and regulatory instruments, and design of investment attraction measures that will be identified in the action plan of the upcoming national digital economy development strategy (planned for adoption in 2021). Specific activities will include technical assistance to design and implement policy and legal reforms, support institutional coordination, and engage with international investors to attract investments into Georgia's digital economy.

Subcomponent 2.2: Promoting use-cases

The subcomponent will promote the use-cases of improved broadband connectivity in targeted rural settlements. Specific tasks include stakeholder and citizen engagement to develop and implement programs to promote use-cases in targeted settlements (in the first phase, education, health, and financial services), and mobilization of facilitators to coordinate and deliver training and outreach activities in targeted settlements. These activities will be implemented in coordination with other public agencies and entities to inform the development of digital platforms and services related to identified use-cases.

Subcomponent 2.3: Increasing digital inclusion

This subcomponent will finance targeted interventions to boost the digital inclusion of rural populations including elderly women and men, ethnic minorities, persons with disabilities, women-headed households, inactive youth, among others. This includes the design and implementation of a mobilization and training program to address the causes of digital exclusion of the identified groups (initial focus will be on ethnic minorities, elder people, persons with disabilities, and women headed households). The Project will also support the design and implementation of a pilot program to provide accessible technologies to facilitate digital accommodation for persons with disabilities in targeted rural settlements. Support for monitoring of the impact of all Project activities, with a focus (as applicable to the settlement) on digital inclusion of women, households headed by women, older people, minorities, and persons with disabilities, will also be included in this subcomponent.

Component 3: Project implementation support

This component will support the management and implementation of the Project and associated activities, including capacity building. This would include hiring consultants needed for key areas such as Project management, technical expertise, procurement, financial management, environment and social protection, monitoring and evaluation, communications, and citizen and stakeholder engagement, to enable Project implementation. Relevant public officials will also receive training on climate change adaptation measures in the context of the Project, such as on emergency response procedures at times of natural disasters, to ensure rapid restoration of the telecom networks and minimize service outage.

4. Legal and Institutional Framework

4.1 Regulatory Framework

National Environmental and Social Legislation Relevant to the Project

Log in Georgia Project must be implemented in full compliance with the national legislation, including laws, regulations, and standards governing environmental management, social protection, labor and occupational health and safety, and preservation of cultural heritage of the country. The legal and institutional framework for health and environment in Georgia is based on the Constitution of Georgia. Though the Constitution does not directly address environmental matters, it does confirm the right of any person to live in a healthy environment. The Constitution also establishes the legal framework that guarantees public access to information, stating that an individual has the right to obtain full, unbiased, and timely information regarding his or her living environment. Public health and the natural environment are covered by many laws, regulations and international agreements.

Following are the key national legal acts relevant for Log in Georgia Project:

- **Environmental Assessment Code (2017).** This Code replaced previously existing laws on environmental impact assessment (EIA) and permitting. Compared to those laws, the new Code is considerably closer to the good international practice and the EU principles. The Code lists two sets of activities, one of which is subject to EIA under any circumstances while the other may or may not require EIA, depending on the project-specific decision of the Ministry of Environment Protection and Agriculture (MEPA). The Code introduces screening and scoping phases in the EIA process. Screening applications and conclusions as well as scoping and EIA applications and reports are all subject to disclosure through the web page of MEPA. The Ministry is responsible for advertising and holding public consultation meetings on scoping and EIA reports. The project proponent is responsible for carrying out EIA. Based on the outcome of the EIA process, MEPA issues positive or

negative decision on the activity under consideration. Positive decision feeds into the process of construction permitting, while negative conclusion blocks it.

Construction works undertaken under the Project are unlikely to necessitate EIA procedure.

- **Waste Management Code (2014).** This Code establishes legal framework for the management of hazardous and non-hazardous wastes, including minimizing waste generation and maximizing reuse and recycling. The Code carries different requirements for construction companies depending on the volume of generated waste. If more than 1,000 tons of non-hazardous waste or over 120 kg of hazardous waste is generated annually from a construction company's operations, the company shall prepare and obtain approval of MEPA on the Waste Management Plan and employ an environmental manager.

Construction supervisor hired for the purposes of Log In Georgia Project implementation shall control the waste mounts generated by contractors and encourage their compliance with Waste Management Code requirements. On top of having Waste Management Plan for various types of waste approved by MEPA, as required, Contractors must follow the rules of household waste disposal and not litter worksites.

- **Law on Soil Protection (1994).** This law is aimed at preventing soil pollution and degradation and improving its fertility.

This law applies to the Project, requiring that during excavation of trenches and pit holes, topsoil is preserved through removing and storing separately with later use for site reinstatement. In addition, fuels, lubricants and other hazardous substances shall be managed the way preventing soil contamination.

- **Legislation of Georgia on Subsoil (1996).** The legislation of Georgia on subsoil includes the Law on Subsoil and other subordinate legislative acts that regulate the study and use of subsoil, any type of mineral resources, and natural underground cavities, and the relations arising in the process of the use, storage and protection of waste (including overburden rocks) from mining and treatment industries, as well as during the construction and operation of underground structures.

This law will be applicable to the extraction of natural construction materials for the Project needs.

- **Law on Water Resource Management (2023).** The Law regulates water resources in Georgia, including the use and protection of surface and underground water. Project developer is obliged to prepare technical projection for the extraction of water from any surface water body, which shall be agreed with and approved by MEPAMEPA.

This law will be applicable to the Project in case water is to be sourced from surface water bodies for the construction needs.

- **Law on Atmospheric Air Protection (1999).** This law protects atmospheric air from negative anthropogenic impacts and guarantees the right of citizens to live in a healthy environment. The law regulates emissions to the atmosphere, provides for gradual harmonization of national legislation in this field with the conventional international standards, and ensures transparency of information on the air quality.

The project does not involve the operation of an industrial facility to which procedures established for stationary sources of air pollution would apply. However, dust emissions must be minimized and construction vehicles/equipment kept in good working condition to avoid excessive exhaust.

- **Law on Cultural Heritage (2007).** This law protects Georgia's cultural heritage countryside and intends to preserve Georgia's national heritage in foreign countries. The law sets forth "compulsory conditions for the implementation of large-scale earth works" with the purpose of preventing damage to unidentified archaeologic heritage. Chance find procedure is clearly established.

Requirements of the law on archaeological assessment prior to earth works and the chance find procedure will apply to the Project. Before earth works are commenced, Open Net shall obtain clearance from the Ministry of Culture of Georgia and ensure that contractors adhere to the change find procedure.

- **Law on Public Health (2007).** The law aims to promote healthy lifestyle, prevent public exposure to negative health impacts, protect reproductive health of families, and manage contagious and non-contagious diseases. Towards this end, the Ministry of Internally Displaced Persons from the Occupied Territories, Labor, Health and Social Affairs of Georgia (MoILHSA) establishes maximum permissible concentrations of pollutants and exposure limits for air, water, soil, noise, and electromagnetic radiation.

Regulations established by this law and its bylaws for the permissible exposure of humans to health hazards must be adhered to by the Project through monitoring and corrective action as required in case the thresholds are exceeded.

- **Labor Code of Georgia (2010).** Administered primarily by the MoILHSA, this law regulates labor relations between workers and employers. It requires fair reimbursement and the creation of safe and healthy working conditions. The law prohibits child and forced labor as well as discrimination based on color, race, sex, sexual orientation, disability, religion, political and social status, and other personal characteristics.

The law includes a number of provisions relevant to the project, including employment guarantees, working time, social insurance, benefits and pensions, age, internal labor regulations (i.e., human resources manual), and occupational health and safety. If a Project the contractor employs foreign workers, the same rights and obligations as those of the citizens of Georgia will be applicable to them.

- **Labor Safety Law of Georgia (2018).** The law establishes rules and norms pertaining health and safety in workplace, safeguarding measures for hazardous professions, obligations of employers and employees, requirements for health and safety trained staff within each enterprise, the procedures for state inspection of health and safety, and process for remedial actions and penalties for noncompliance. The Labor Inspection Department of the MoILHSA is in charge of enforcing this law.

Safety at the Project worksites will be ensured by full adherence to this law, including worksite risk assessment and its regular updates.

Technical norms, standards and regulations

Ordinance #383 of Government of Georgia on Ambient Air Quality Standards, July 27, 2018
Ordinance #425 of Government of Georgia on Protection of surface waters from pollution, December 12, 2013
Ordinance #17 of Government of Georgia on Environmental Technical Regulations, January 6, 2014
Ordinance #424 of Government of Georgia on Removal, Storage, Use and Re cultivation of topsoil, December 31, 2013,
Ordinance #440 of Government of Georgia on Water Protection Zones, December 31, 2013,
Ordinance #242 of Government of Georgia on Forest Use Rules, August 20, 2010,
Ordinance #211 of Government of Georgia on Rules of Development and Adoption Company's Waste Management Plan, August 4, 2015
Ordinance # 347 of Government of Georgia on Safety Rules of Construction of Power Lines and Installation of Electrical Equipment, December 17, 2013
Government Decree No. 59 dated January 15, 2014, on the approval of Technical Regulation on the Usage of Settlement Territories and Regulation of Development
Construction Norms and Rules for Seismo-resistant Construction (01 January 2009)
Cement and Concrete Construction norms and rules (01 January 2008)
Climate Studies of Georgia (01 May 2008)
Electricity Supplier Requirements: Georgia Power Company - Rules and Regulations for Electric Service
Code of Practice for Energy Efficiency of Electrical and Lighting Installations issued by the Government of Georgia
IEC 60364-7-704 – Construction and Demolition Site Installation
IEC 60335 – Safety of household and similar electrical appliances
EU Standard EN 12828
СНИП II-23-81*
СНИП 2.01.07-85
СНИП 7-81
СНИП 28-73

4.2 Environmental and Social Framework of the World Bank

Log In Georgia Project is implemented with the proceeds of a World Bank loan, which requires that the Project meet the World Bank's relevant Environmental and Social Standards (ESSs), as well as the national legislation of Georgia. If the requirements differ, the more stringent one has to be complied with. The World Bank's Environmental and Social Framework (ESF) includes the Environmental and Social Policy for Investment Project Financing, which describes the requirements the Bank must follow for projects it supports through Investment Project Financing, and 10 ESSs, which establish requirements for Borrowers such as Open Net to identify, assess, and control environmental and social risks and impacts of Bank-supported projects. The application of these standards, by focusing on the identification and management of environmental and social risks, supports Borrowers in their goal to reduce poverty and increase shared prosperity in a sustainable manner for the benefit of the environment and citizens. The standards aim to support Borrowers in achieving good international practice relating to environmental and social sustainability; assist Borrowers in fulfilling their national and international environmental and social obligations; enhance non-discrimination, transparency, participation, accountability and governance; and enhance the sustainable development outcomes of projects through ongoing stakeholder engagement. An overview of the ESSs and their relevance to the Log In Georgia Project is provided in Table 1 below.

Table 1. Summary of the Relevant Environmental and Social Standards

Environmental and Social Standards (ESS)	Relevance to the Project
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	The standard is relevant to the Project. Although the Project is likely to result in positive environmental and social benefits, there are potential environmental and social risks and impacts deriving from civil works. An ESMF is prepared for the Project setting out the principles, rules, guidelines and procedures to be followed to address and mitigate environmental and social risks and impacts. On the basis of the ESMF, site-specific Environmental and Social Management Plans (ESMPs) will be prepared detailing the measures to be taken during implementation to eliminate or offset adverse environmental and social impacts or reduce them to acceptable levels. The ESMF includes differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable. It utilizes national environmental and social institutions, systems, laws, regulations and procedures where appropriate. ESMPs to be developed for individual investments will use generic mitigation measures provided in the ESMF to apply the impact mitigation hierarchy as appropriate.
ESS2: Labor and Working Conditions	This standard is relevant given that the Project will hire both direct and contracted workers. Direct workers will be engaged directly by the country-level Project implementing entity to work specifically in relation to the Project. Contracted workers will work on the Project, hired by third parties. Labor relations, rules of employment, occupational health and safety, workforce protection, worker grievance mechanism, with specific requirements for contractor and subcontractor employees will adhere to national legislation and to ESS2 requirements. Accordingly, a Labor Management Procedures (LMP) is prepared inclusive of the Grievance Redress Mechanism for workers. The LMP outlines areas of alignment and gaps between Georgian national legislation and ESS2, the terms and conditions of employment, OHS requirements and mitigation measures that will apply to the present Project.

ESS3: Resource Efficiency and Pollution Prevention and Management	The standard is relevant. The Project seeks to avoid, minimize, and/or manage project-related non-hazardous and hazardous waste. The Project will also promote the sustainable use of energy and water during the construction and operational phases as necessary.
ESS4: Community Health and Safety	The standard is relevant. Some activities, such as transportation of materials, and equipment may increase the risk of traffic hazards, so the Project will avoid or minimize community exposure to Project-related traffic and road safety risks, diseases and hazardous materials, and have in place effective measures to address emergency events. The Project will promote quality, safety, and climate change considerations in infrastructure design and construction. Specific needs of vulnerable groups will be taken into account when ensuring community health and safety measures, for example, provision of accessible infrastructure and appropriate access for elderly, children, persons with disabilities.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	The standard is relevant. Even though the Project will prioritize building infrastructure in such a manner that it would not affect any private properties, there is still a chance of small-scale need for land acquisition or land use restrictions permanent or temporary) because of the deployment of fiber optic cables along long stretches in remote and mountain territories. Open Net has prepared a Resettlement Planning Framework (RPF) that establishes eligibility criteria and entitlements for affected persons, sets out the procedures and standards for compensation, and arrangements for consultations, monitoring and addressing grievances. Subproject-specific Resettlement Action Plans (RAPs) setting out measures and actions to minimize, avoid or mitigate risks, will be developed as needed, and implemented ensuring that compensations and assistance are received by affected persons before construction work begins
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	This standard is not relevant to the Project.

ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	This standard is not relevant to the Project as no indigenous people are known to reside in Georgia.
ESS8: Cultural Heritage	This standard is not relevant to the Project. As a precautionary measure, procedures to be applied in case of chance finds in order to protect archaeologic heritage are covered in the ESMF.
ESS9: Financial Intermediaries	This standard is not relevant, as there are no financial intermediaries involved in the Project.
ESS10: Stakeholder Engagement and Information Disclosure	The standard is relevant. Open Net prepared a Stakeholder Engagement Plan (SEP) and a Project-wide Grievance Redress Mechanism (GRM). This document and other safeguards instruments (LMP, RPF, ESMF) will be disclosed and consultations with the relevant stakeholders be held. Engagement with stakeholders will continue throughout the duration of the Project, and the SEP may be updated if required.

5. Environmental and Social Baseline

5.1 Physical Environment

Located in the region known as the Caucasus or Caucasia, Georgia is a small country of approximately 69,875 square kilometers. To the north and northeast, Georgia borders Russia. Neighbors to the south are Armenia, Azerbaijan, and Turkey. The shoreline of the Black Sea constitutes Georgia's entire western border. Georgia lies mostly in the Caucasus Mountains, and its northern boundary is partly defined by the Greater Caucasus range. The Lesser Caucasus range, which runs parallel to the Turkish and Armenian borders, and the Surami and Imereti ranges, which connect the Greater Caucasus and the Lesser Caucasus, create natural barriers that are partly responsible for cultural and linguistic differences among regions. Georgia has about 25,000 rivers, many of which power small hydroelectric stations. Drainage is into the Black Sea to the west and through Azerbaijan to the Caspian Sea to the east.

Figure 1: Map of Georgia

5.2 Natural Environment

Georgia, as part of the Caucasus eco-region, represents one of 34 biodiversity "hotspots" identified by Conservation International as areas distinguished for having high levels of endemism whilst also being seriously threatened by habitat loss. The Caucasus eco-region is also identified as having global significance by World Wildlife Fund (WWF) due also to high levels of diversity and endemism but also because of specific evolutional processes and unique historical floral and faunal development.

Mountains occupy a significant portion of the country: 54% of the country is located at altitudes higher than 1000 m above sea level. Forests cover about 40% of the territory of Georgia. Broadleaf and coniferous forests, rich with endemic and rare species, are the true treasure of the state with 97% of Georgian forest being natural. The vast majority (98%) of forested land is represented by mountainous forests providing such ecosystem services as water regulation, soil protection and climate stabilization whilst also being important habitat for many relict, endemic

and endangered species of plants and animals. Georgia's flora is one of the richest among countries with moderate climates with 4,130 vascular plant species, including around 900 species (approximately 21%) that are either Caucasian or Georgian endemics. In terms of the country's faunal components, 16,054 species have been described, 758 of which are chordates. Amongst the Caucasian endemics there are 19 mammals, three birds, 15 reptiles and three amphibians whilst the Georgian endemics are represented by only one species - the Adjarian lizard. Project activities will be implemented across all regions of Georgia but will predominantly follow the existing communication corridors creating minimal environmental footprint.

5.3 Poverty, Social and Gender Assessment

Georgia gained independence from the former Soviet Union in 1991, but a period of political instability and conflict hampered the country's development. The first decade of the 2000s saw rapid economic growth, but this was short-lived due to the 2008 conflict with the Russian Federation and the global financial crisis in 2008 and 2009. The period between 2010 and 2014 saw rapid economic development, with annual growth in gross domestic product (GDP) from $11.6 trillion to $16.5 trillion, and a gross national income (GNI) per capita from $3,000 in 2010 to $4,490 in 2014. But growth dipped slightly between 2014 and 2016, with GDP at $14.38 billion and GNI per capita at $3,830. However, economic growth has been very unevenly spread, mainly occurring in urban areas—particularly the capital, Tbilisi. About one-fourth of the population (21.9%) lives in absolute poverty. Women account for a significant proportion of the poorest, and female-headed households are overrepresented among the poor. Although overall poverty levels dropped from 42.7% to around 20% between 2010 and 2015, they remain among the highest in the Eastern Europe and Central Asia region.

Georgia made some significant strides forward in creating an enabling environment for gender equality in the past 30 years. The recognition of equal rights for all is a cornerstone of its constitution, and dedicated legislation has been put in place to promote nondiscrimination and women's rights. However, these measures have not translated into overall progress against regionally and globally comparable gender equality outcomes. In 2017 Georgia ranked 94th out of 144 countries, compared to 90th in 2016, 88th in 2010, and 54th in 2006. This puts Georgia among the lowest five countries for gender equality within the Eastern Europe and Central Asia region, just above Tajikistan, Armenia, Azerbaijan, and Hungary.

Although Georgia achieved near gender parity in educational attainment, the country needs further improvements on key global indicators of economic status and political voice. According to the most recent United Nations Development Programme (UNDP) Global Gender Index figures, women's labor force participation rate was 57.3%, compared to 78.4% for men. Even though the number of female parliamentarians has been rising in the last few years, women still hold only 16% of seats in the Parliament in 2017. Georgia ranked 114th of 144 countries for

women's political empowerment in the 2017 World Economic Forum Global Gap Index. Georgia also has skewed female-to-male sex ratios at birth.

Other vulnerable and disadvantaged groups that may be potentially disproportionately affected by the Project or not benefit equally by the Project, due to lack of voice or equitable means to express their voice and participate in Project decisions include: elderly women and men, internally displaced persons (IDPs), persons with disabilities and their households and caregivers, inactive youth, and ethnic minorities, among others.

Elderly people comprise a larger proportion of the population in the remote rural areas. They are also often owners of household-based micro and small enterprises such as guesthouses, cafes, restaurants, shops, produce suppliers, etc. However, their knowledge and experience using digital technologies is expected to be lower, hence, their take-up and use of high-speed internet may require additional outreach and skills training. Mobility limitations and long distances may also prevent elderly from full participating in Project activities. Affordability is also a concern as elderly households often rely on low fixed cash incomes.

IDPs from the Autonomous Republic of Abkhazeti (Abkhazia) and South Ossetia comprise approximately 7 percent of Georgia's population. As such, Georgia is one of the countries with highest of IDPs in the world. IDPs are particularly exposed to challenges such as lower employment, lower asset ownership, weaker social networks, and less secure housing. Three quarters of the IDP population ices in cities therefore the IDPs share in the target Project areas (remote and rural) may be lower; however, needs of IDPs particularly for capacity building and training should be considered to the extent that such groups are found within the targeted settlements. IDPs from natural disasters such as landslides (i.e., 'eco-migrants') are also found in many regions of Georgia and their needs should be equally considered in the project.

Persons with disabilities and limited abilities, as per the latest national Census (2014), comprise 8 percent of the population. Persons with disabilities, as well as their households and caregivers face a number of barriers to accessing development projects and services – physical barriers due to inaccessible infrastructure, lack of appropriate transportation, lower incomes as the education levels and employment of persons with disabilities is often lower due to lack of inclusive education curriculum and infrastructure in all parts of the country. Furthermore, persons with disabilities are often subject to social stigma within their communities which contributed to their invisibility and low participation in public activities, spaces, markets, and services.

Youth Not in Employment, Education, or Training (YNEET) comprise almost a third of young persons in Georgia. These youth, those of whom reside in rural areas and may be potential beneficiaries from the Project, hold high potential to improve their own lives and the opportunities within their community via more productive use of internet and technology. As such, YNEETs would also represent a target group for the Project Component 2 activities aimed at digital literacy and improving productive use of internet.

Ethnic minorities comprise approximately 15 percent of Georgia's population. The two largest minority groups are Azerbaijani and Armenian. These are concentrated in selected regions of Georgia (Armenian minority in Samtskhe-Javakheti region, and Azerbaijani minority in Kvemo Kartli region as well as to a lower extent in Kakheti region), although their representatives can be found throughout the country. Only about 19 percent of Azerbaijani and 40 percent of Armenian minority persons in Georgia are fluent in the Georgian language. This is one of the most significant barriers for their participation in social and economic life, accessing information, and benefitting from available services and projects. The Project would incorporate tailored outreach measures as described in SEP to include minority groups in consultations and target them in digital literacy activities. Wherever concentration of minorities is observed, the Project would ensure availability of facilitator speaking the minority language, and translation of Project materials in the predominant language of the area in addition to Georgian.

The Log In Georgia Project aims to improve access to affordable high-speed broadband services in Project areas across all regions of Georgia, promote the use of digitally enabled services, and increase digital inclusion through targeted support for vulnerable populations. The latest World Bank study on social exclusion in Georgia identifies vulnerable population groups, many of whom reside in rural areas. These include elderly women and men, persons with disabilities, ethnic minorities, and IDPs. The Project's digital inclusion activities will specifically focus on these vulnerable populations. Many of these groups, due to their spatial or social isolation, would particularly benefit from the use of digital technologies for education, income generation, access to public or financial services, among others. Therefore, the Project targets these groups and incorporate tailored outreach measures to ensure their inclusion and participation in Project activities.

6. Institutional Framework

This section outlines the implementation arrangements of Log In Georgia Project. The section provides guiding principles for implementers and partners.

Open Net is the Project implementing entity. This non-entrepreneurial, non-profit institution is established by the Innovation and Technology Agency of MoESD. ComCom will play an important role in the Project implementation, especially in regard to its Component 2. ComCom is an independent regulatory authority. Established on July 1, 2000, it is responsible for the broadcasting and electronic communications sectors. The Commission is a collegial administrative body. The Commission regulates TV broadcasting, Radio broadcasting, fixed/mobile telephone and internet services. The Project will be implemented by Open Net over a five-year period, under the oversight of MoESD. Open Net will be the Project implementing entity. It will implement Subcomponent 1.1. And it will implement jointly with MoESD Subcomponents 1.2 (a), 1.2 (c) and 2.1, and jointly with ComCom Subcomponents 1.2 (b), 2.2 and

2.3. Hence, MoESD and ComCom will also be implementing agencies under the Project. A Project Coordination Group (PCG), with the Project Director as its chairperson, will be created to coordinate and ensure smooth implementation across the implementing agencies. The PCG will provide a biannual reporting on Project implementation progress and identify issues for the attention to the Minister of MoESD. Open Net will also manage the Open Net network following its construction and offer wholesale services to third party SPs; it will not offer retail services. The MoESD Deputy Minister, responsible for overseeing the information and communications technology (ICT) sector, is designated as the Project Director. Ensuring strong collaboration and transparency across implementation agencies is seen as critical for the successful implementation of the Project. These arrangements would be governed by the guidelines and procedures set out in a POM and applied through a Subsidiary Agreement between agencies involved in implementation of the project.

Open Net undertakes the procurement, financial management, implementation of ESSs, reporting and monitoring tasks for all Project activities. For activities implemented under ComCom's technical leadership, ComCom is responsible for the design, technical specifications and requirements and for contract management, but all contracts with consultants, works provider and suppliers will be signed by the Open Net. For various subcomponents, a lead agency participates in the evaluation committees for procurement and will sign off on all consultant and contractor invoices prior to submitting a request to the Open Net to make a payment. Such arrangement allows a centralized approach to Project implementation functions, particularly procurement, financial management, and environmental and social management. Given the absence of experience of Open Net staff in the implementation of the World Bank-financed operations, the Project finances consultants to strengthen its capacity as needed. Minimum institutional capacity for adequate environmental and social management of the Project implies employment of one or several specialists fully competent in environmental, social, health and safety aspects of construction works and capable of leading community liaison. These may be core staff of Open Net or Com Com as well as external consultants hired by Open Net. Monitoring and evaluation will be provided by a hired supervision company.

The responsibilities of an **Environmental and Social Specialist** include the following:

- Lead the implementation of environmental and social instruments;
- Ensure compliance of al Project activities with the World Bank's relevant ESSs, ESF instruments, and the national environmental and social legislation;
- Undertake environmental and social screening of all subprojects to (i) ensure that no subproject is accepted for further processing if its environmental and social risks are substantial or high, (ii) describe subproject-specific environmental and social risks and impacts, (iii) define whether an ESMP has to be developed for a subproject to adequately manage the identified risks and expected negative impacts, (iv) reveal a need for land take or any other type of involuntary resettlement, identify adequate format of the required

resettlement documentation (RAP or abbreviated RAP), develop or cause it to be developed and ensure quality; oversee consultation on RAPs with the affected people, oversee completion of compensation payment, livelihood restoration and resettlement process, and delivery of a satisfactory completion report prior to authorizing commencement of works in a given subproject site;

- Develop ESMPs for subprojects with moderate environmental and social risks; ensure their disclosure in Georgian and English languages through the web page(s) of Open Net; organize stakeholder consultation on the draft ESMPs; participate in stakeholder consultation meetings drafting minutes of consultations, taking photos, and obtaining contact information and signatures of participants; and incorporate relevant public feedback to the final versions of ESMPs;
- Undertake quality assurance of environmental and social monitoring of works, ensure adequacy and completeness of monthly field environmental and social monitoring reports in documenting any incompliances, guarantee provision of advice to works providers on rectifying of the identified shortfalls and follow up to check outcome of the recommended actions;
- Alert the Open Net management on significant issues revealed through environmental and social monitoring and recommend remedial action;
- Oversee operation of the Grievance Redress Mechanism (GRM) described in the ESMF and SEP, and ensure its viability;
- Ensure implementation of the Project LMP as it relates to the works of civil works contractors and contracted workers (in collaboration with Open Net's Labor, Health, and safety specialist)
- Provide analytical write-ups on the environmental and social performance of the Project for including into the general progress reporting.
- Immediately report to Open Net management on any environmental and social incidents at or around Project sites causing tangible damage to human and/or environmental health and take lead in preparation of an incident notification report, its root cause analysis and corrective action plan for the submission to the World Bank.

The responsibilities of a Community Liaison Officer include the following:

- Be responsible for implementation of the SEP and execution of citizen engagement activities pertaining to all aspects of the Project. They will be involved in the public consultation process for each subproject at the demand assessment stage and continue coordination of engagement through Component 2 activity implementation – training on use-cases and support for digital inclusion. This individual will serve as the main grievance redress focal point for the Project. The individual will undertake the following responsibilities:

- Ensure that contact information for grievances pertaining to the Project is available at all subproject sites and easily accessible to local citizens and Project-affected persons and that the GRM records include information about GRM process, procedures and service standards;
- Ensure that local authorities are aware of the grievance redress mechanism and their roles and responsibilities in it;
- Ensure that any grievances received by Open Net are recorded, resolved or referred to competent authorities, and resolved;
- Maintain grievance redress log; ensure that adequate attention is paid to gender in conducting all surveys and collection and analysis of demographic, physical, economic, and financial data to attain this objective;
- Ensure that gender-disaggregated analysis is conducted on all relevant aspects of the Project;
- Report on the participation of men and women and recommend opportunities for them to participate in the planning and implementation phases of subprojects.

The responsibilities of **the Labor, Health and Safety Specialist** include the following:

- Provide and maintain safe working conditions for all the works associated with various components of Log In Georgia Project;
- Inspect, test, and evaluate workplace environments, equipment, and practices to ensure that they follow safety standards laid out in the Environmental, Health and Safety (EHS) Guidelines of the World Bank Group, Good International Industry Practice (GIIP) and the national regulations;
- Design and implement workplace processes and procedures that help protect workers from hazardous work conditions;
- Ensure relevant EHS training is provided to workers;
- Take action toward prompt notification of the World Bank on any environmental and/or social incidents/accidents leading to tangible damage to human and/or environmental health, Investigate incidents and accidents to identify their root causes and work out remedial actions, ensure due measures are taken for safe conservation of work sites in the event works are taken on hold and contractor is demobilized from a site.

Technical Supervisor of Works:

Technical supervision of works, including environmental and social monitoring, will be performed by a hired construction supervision company. The environmental and social supervision function of the technical supervisor will include, but may not limited to the following:

- Provide regular field environmental, social, and health and safety monitoring of works at all active work sites;
- Fill out monthly field environmental and social monitoring checklists and create dated photo documentation;
- Advise works providers on rectification of any revealed shortfalls in environmental, social and health and safety performance of the construction contractor and track their implementation;
- Record and promptly inform Open Net on any environmental, social and health and safety incidents leading to tangible damage to human or environmental health; after initial reporting, cooperate with the Open Net in collecting evidence on the incident, understanding its root causes, designing corrective actions and ensuring their implementation by construction contractors.

Construction Contractors:

Open Net will hire Construction Contractors for the provision of civil works. Contractors will be responsible for full adherence to ESMPs which will be attached to works contracts and be binding for them. Based on the ESMPs received from the Open Net, Construction Contractors will develop their EHS plans spelling out how they will approach implementation of Employer's ESMPs and providing technical details and specifications of the required actions. Contractors are also expected to have an Environmental and Social Code of Conduct, which all personnel is familiar with and follows. No person may be employed by Works Contractor without a formal individual work agreement/contract in place. All workers must be covered with health and life insurance.

Contractor's responsibilities include liaison with subproject-affected local communities that includes, but may not be confined to:

- Ensure work site safety for staff and prevent external access to worksites to ensure public safety and prevention of accidents;
- Post construction company's name and contact information near the work sites notifying local communities about duration and general type of works to be undertaken
- Alert local communities ahead of time about cut-offs of utility services caused by subproject works, indicating timing and duration of such cut-offs;
- Inform Open Net on issues raised by local communities if they cannot be resolved on-site by Contractor.

Also, Construction Contractor will be responsible for immediate suspension of all activities on site in case of encountering chance finds and prompt notification of the employer on such finds.

Contractors will be forbidden to take any further action until receipt of written communication from the Open Net.

Construction Contractor will be obligated to immediately report technical supervisor of works and Open Net on any environmental, social and safety incidents leading to tangible damage of human or environmental health, to cooperate with them in fact-finding, and implement corrective actions prescribed.

Other Central Government Agencies

Ministry of Environment Protection and Agriculture of Georgia. MEPA has the overall responsibility for protection of environment in Georgia. The Department of Environmental Assessment of National Environmental Agency under MEPA reviews Environmental Impact Assessment reports for activities subject to environmental permitting and issues positive or negative environmental conclusion. Positive conclusion is required for obtaining a construction permit. MEPA is mandated to undertake control over the compliance of construction works with the terms and conditions of the issued decision as well as compliance of any activity with environmental legislation currently in force. Works to be performed under the Log in Georgia Project are not expected to be subject to environmental review.

National Agency for Cultural Heritage Preservation (NACHP) under the Ministry of Culture provides formal consent on the issuance of a construction permit in case works are to be carried out in historic sites or zones of cultural heritage. If Construction Contractor encounters chance finds on a subproject site, Open Net must notify NACHP and receive its instructions on the further course of action. Open Net may not authorize resumption of work until obtaining consent of the NACHP confirming that all urgent measures are taken for the preservation of archaeological heritage.

7. Rules and Procedures for Environmental and Social Screening and Assessment

The selection of beneficiary settlements for the Project intervention will be undertaken by Open Net based on the information provided by the ComCom with the use of the following criteria: settlements classified as “white zones” by ComCom, whose populations exceed 200 residents, and where operators do not plan to construct broadband infrastructure for three years after the launch of the program. The criteria for phasing network construction will be developed and agreed by the Project Coordination Group, under the leadership of the deputy Minister of MOESD responsible for ICT.

Environmental and social screening is intended to assess environmental and social risks of the proposed subprojects and verify their eligibility for Project financing. It will be undertaken using

environmental and social screening forms (***Attachments 1 and 2*** of this ESMF). For eligible activities, screening outcome will include identification of the appropriate extent and type of environmental and social assessment (ESA) as required by ESS 1 of the World Bank as well as the national environmental legislation.

The ESA will (i) generate detailed technical information on the positive and negative environmental and social impacts expected from individual subprojects at the construction and operation phases, (ii) select and adjust mitigation measures applicable to individual subprojects from the generic set of actions included in the present ESMF, and (iii) produce a detailed plan for monitoring environmental and social performance under individual subprojects. The ESA findings will also feed into the process of designing subprojects through informing on environmental, climatic and social sensitivities, vulnerabilities and hotspots impacts on which may be reduced or avoided by application of adequate design solutions.

Information disclosure and public participation will be an integral part of the ESA process. Environmental and social management instruments prepared for individual subprojects will be publicly disclosed in the manner accessible and suitable for consumption by the stakeholders and a meaningful consultation will be undertaken to solicit public feedback. Particular attention will be paid to the engagement of project-affected communities, other local stakeholders disadvantaged/vulnerable groups, to enable them to participate actively in decisions about avoiding or managing environmental and social impacts.

Environmental and Social Specialist of Open Net will perform environmental and social screening of subproject proposals and provide confirmation or denial of subproject eligibility from environmental and social standpoint.

8. Sensitive Receptors and Potential Impacts

Log In Georgia Project activities will be carried out in the settlements countywide.

Deployment of the backhaul infrastructure to connect eligible settlements to the existing national backbone networks will bring positive changes to delivery of internet services. The training and digital inclusion activities supported by the Project in the connected settlements will support increased use of digital services. The expected overall positive environmental and social impacts from the Log in Project will be long-term and cumulative in nature, ultimately contributing to the increased social and economic benefits of the communities affected.

The potential adverse environmental and social impacts are described below for the construction and operation phases of the Open Net network. Other Project-supported activities will deliver technical assistance and entail consultancy services and surveys with limited potential for environmental and social adverse effects. In general, the potential adverse environmental

impacts associated with the construction of passive elements of the fiber optic cable network are expected to be construction-associated, short-term and localized. Vast majority of the potential adverse impacts will be observed during the construction period only and will mainly occur within the site of works implementation.

The impact assessment was conducted considering all major receptors both for construction and operation phases. When there could be adverse impacts, mitigation measures were identified and selected using the mitigation hierarchy.

8.1 Construction Phase Impacts

To ensure resilience to of the region-specific climate change and natural disaster risks underground deployment of optical cables will be prioritized, with the design to be resistant to floods, heavy snowfall, strong winds, landslides and other natural disasters.

Degradation of landscapes and soil erosion. Some of the areas are sensitive to soil erosion; therefore, when undertaking earth works and leveling the area anti-erosive measures will be implemented during the re-cultivation period.

Pollution by construction run-offs. As a result of oil leakage from machinery and stockpiled construction materials, oil products and chemicals can penetrate the ground water or run off to surface waterbodies.

Impacts on biodiversity. Impact on natural or critical ecosystems and on the provision of ecosystem services is not expected. Clearing of vegetation may be required within narrow strips of land within which the passive elements of the network will be laid. Because the cables will be installed mainly within the right of way of the existing roads, modest impacts are likely predominantly in the transformed habitats. If the optic fiber cable alignment passes close to the designated protected areas or other areas of high biodiversity value, careless operation of construction machinery, poorly organized temporary storage of construction materials and waste and misbehavior of workers may negatively affect these sensitive receptors.

Noise, vibration, and emissions. Noise, vibration, and emissions will be generated in the course of the transportation of construction materials and truck traffic. Emission of inorganic dust from excavation and loading works and emission of harmful substances and dust from combustion of diesel used by transportation means and machinery occur during the construction works. Welding works cause welding aerosol and manganese monoxide emissions. Concrete mixers work result in concrete dust emissions.

Generation of excavated materials and construction waste. Excess soil will be generated during excavation works. Generation of asbestos-containing waste is also possible while relocation of the existing infrastructure (asbestos-containing pipes).

Safety hazards from construction activities. Safety hazards may occur due to violation of proper health and safety practices and may lead to injuries and accidents. Corporate culture of many local construction companies does not include strong discipline in the use of personal protective equipment; installation of warning signage, demarcation and fencing of construction sites; and traffic management around and within working area. If works are undertaken in proximity of settlements or within them, deficient health and safety ensuring practices may affect safety and wellbeing of local communities.

Traffic management. Because optic fiber cables are likely to be laid mostly within the corridors of the existing motor roads, potential threats of poorly managed traffic are important. Movement of the construction machinery and vehicles may cause disruption of local traffic and add to the risk of traffic accidents. Temporary placement of excavated material, other waste, construction materials of pieces of machinery in the carriageway or road shoulders may also cause roadside accidents. Finally, negligence of safety measures and poor traffic management may expose workers operating within a road corridor to the risk of being hit by moving vehicles.

Impacts on historic-cultural and archaeological monuments. Some damage can be caused due to improper implementation of civil works near the cultural and/or historic monument.

8.2 Operation Phase Impacts

Safety hazards from operation activities. Operation of the Open Net network will not pollute the environment with discharges, generated waste, noise or vibration. In case of power outages, maintaining consistency of internet service provision may require deployment of backup sources of energy, such as battery storage or diesel generators, resulting in emissions and risk of improper disposal of batteries.

Localized social and economic impacts. Impacts on the local population and its occupation are expected to be generally positive through the improved access to the Internet, training and digital inclusion. The Project will create temporary and some permanent job opportunities for the local population (both men and women), as they could be employed during construction and maintenance. Minor to moderate risk of over-expectation on behalf of Project beneficiaries exist in regard to job opportunities and economic benefits. Additionally, it will support individuals and enterprises within the connected settlements to increase their use of digital services, leading to potential increases in welfare, reduction in transaction costs, and increased earning. The Project will monitor these impacts by applying gender-disaggregated indicators. Availability of high-speed internet will allow more people (especially youth) to stay in the village.

9. Impact Mitigation

Mitigation measures that could be used where appropriate (depending on type of infrastructure, volume and type of works, surrounding area, etc.) are separately defined for the design, construction and operation phases. Appropriate measures will be included into the ESMPs to be prepared by filling a checklist Environmental and Social Management Plan template (***Attachment 3*** to this ESMF).

9.1 Open Net Network Design Phase

Environmental and social mitigation requirements will be incorporated in the final designs, technical specifications, and bidding documents to be implemented by the construction contractors and the maintaining entity to avoid, prevent, or minimize the potential impacts. ESMPs will include references to the suggesting authorized mines of natural construction material in the vicinity of a given subproject site and a list of permits and agreements to be obtained from the relevant State and local authorities by construction contractor.

Because the construction activities under the Log In Georgia Project will imply much earth work, detailed design of subproject will be based on the thorough study of geologic conditions of the work sites. Designs will be adjusted so that the need for vegetation clearance – especially extraction of trees – is minimized.

9.2 Construction Phase

Preserving landscapes and minimizing soil erosion. To minimize degradation of landscapes and soil erosion, Contractors will use, where possible, existing quarries for required natural construction materials. Suitable excavated and dredged soils will be preferably used, thus limiting the need for quarrying. Access roads will be carefully chosen to minimize impacts on landscape and soil erosion and construction traffic will be closely monitored to exclude free movement of vehicles outside the designated routes. Indiscriminate land clearing and excavation will not be permitted.

Managing construction run-offs. Existing access roads will be used where possible, thus minimizing the need for establishing new ones. The surface of access roads and work areas will be compacted to minimize runoff and avoid waterlogging of the area. Any drain clogged by construction material or sediment will be cleaned promptly to prevent overflow and flooding. This may require digging drainage ditches and connecting them to natural drainage axes / rainwater discharge system (e.g. if available along the nearby road). Sites for storage of oil and lubricants, if any, will be properly equipped to minimize the risks of polluting soil and water. If works contractor needs to establish construction camp(s), the septic tanks to be placed within them will be made of impermeable material and will be emptied on the regular basis. The

wastewater will be transported by a special truck to a centralized wastewater collector, based on the agreement obtained from the local authorities during the design phase.

Preserving biodiversity. Works will be conducted within strictly identified corridors. Extraction of trees will be minimized to the extent possible. All trees to be removed will be marked. Permission for tree-cutting and handover of timber will follow established formal procedures depending on the ownership of land under these trees. No excessive tree-cutting will be allowed. All large trees will be marked and cordoned off with fencing, their root system protected, and any damage to the trees avoided. Personnel of works contractor will be strictly prohibited from hunting, foraging, logging or other damaging activities.

Managing noise, vibration, and emissions. Dust-depressing measures aimed at prevention of air pollution through watering of access roads and construction sites will be implemented. During construction, air pollution levels will increase locally, and the main pollutants caused by these operations will include exhaust gases emitted by machines and dust caused by the earthwork and stonework. Water sprinkling during construction will alleviate dust impacts, also construction materials such as sand, cement or other similar will be kept properly covered. Dust and noise from the construction site will be minimized by using closed/covered trucks for transportation of construction materials and debris. To minimize impacts on nearby settlements, the vehicles will be equipped with exhaust mufflers and regularly inspected to ensure their proper technical condition. The surrounding environment (sidewalks, roads) will be kept free of debris to minimize dust. There will be no open burning of construction / household waste. Construction works will be carried out only during daytime hours. Temporary noise barriers may be installed in the construction site as need be, to minimize noise levels exceeding the permitted thresholds. Affected communities will be notified in advance of the planned works that may occur on weekends or outside of working hours or during public holidays. Noise generating sources will be located away from residential or other noise sensitive receptors. If residents complain of noise, the contractor or Open Net will monitor noise at the location of concern and implement mitigation measures if noise levels exceed standards established through the national regulations.

Waste management. Temporary on-site storage of construction waste as well as its final disposal will be strictly regulated. Waste will be stored temporarily in the designated locations of the construction site, not preventing access or posing threat.

Waste collection and disposal pathways and sites will be identified for all major waste types expected from demolition and construction activities.
If hazardous waste is generated during excavation works, it will be packed, demarcated and stored under cover. Personnel handling hazardous waste will receive special training and personal protective equipment, the use of which will be strictly imposed.

No excessive volumes of waste will be accumulated on-site. Agreements on the final disposal of waste will be obtained from local authorities or waste acceptance agreements be signed with the designated landfills.

No free dumping or open-air burning of any type of waste will be allowed. Restoration to quasi-original conditions of landscape will be carried out after completion of works and after use of quarries by the construction contractor. Whenever feasible, the contractor will reuse and recycle appropriate and viable materials (except asbestos or other hazardous material)

Managing safety hazards. No major hazards are expected during the construction of passive elements of the network. Contractors will have an Occupational Health and Safety (OHS) Plan is in place to guide work activities and provide a safe environment for workers.

All relevant Labor and OHS regulations will be adhered. Workers must be provided with necessary equipment as well as protective gear as per their specific tasks such as hard hats, overalls, gloves, goggles, boots, etc. Sanitary facilities must be provided for all workers on site. Contractor(s) must ensure that there are basic medical facilities on site and that there are staff trained in the delivery of first aid. Appropriate posting of information within the site must be done to inform workers of key rules and regulations to follow.

Traffic Safety. Works contractor(s) will be requested to develop and agree with the supervision engineer of the Open Net a Traffic Management Plan to regulate movement of construction machinery of vehicles, ensure proper signaling and warning signage in the work sites located along the motor roads and other measures aimed at avoiding traffic and other roadside accidents, ensuring safety of workers, road traffic and nearby communities. It will also include training for drivers to sensitize them to the safety rules and requirements. Long hours of driving will be avoided. If travelling long distances, two drivers will be dispatched to work in shifts.

Preserving historic and/or cultural monuments. In case construction of the cable ducks and shelters requires entry to the cultural heritage buffer zones, a consent of the Ministry fo Culture shall be obtained before issuing of a construction permit. Contractors will be required to take all physical activity on hold in case of chance finds during excavation works and to promptly notify employer (Open Net). Open Net will communicate with NACHP and provide an enabling environment for the required archaeological work. Works will resume upon formal consent of NACHP to Open Net and a notice from Open Net to the contractor.

9.3 Operation Phase

Education and training of Project beneficiary communities will be undertaken to manage expectations from digital inclusion and maximize their benefits in the form of job opportunities, economic activity and availability of e-services. Particular effort will be invested in ensuring that the vulnerable groups are not even further distanced from the increasingly digitized economy.

Open Net will regularly inspect passive elements of the network and associated facilities to ensure proper technical state and prevent damages. Periodical maintenance of network and associated infrastructure will be undertaken timely and in due manner. If battery storage or diesel generators are used to maintain consistency of internet service provision during power shortages, (i) the used batteries will be turned in to supplier, (ii) generators will be installed outdoors or in well-ventilated premises and in the locations minimizing nuisance to communities from noise and exhaust, and (iii) the use of energy-efficient generators will be required.

10. Environmental and Social Management Planning

Based on the outcomes of environmental and social screening of subprojects, ESMPs will be prepared for moderate risk activities identifying all technical details associated with risks identified at the screening stage, adjusting generic set of mitigation measures suggested at the screening stage to the specific needs of a subproject implementation and producing environmental and social monitoring plans. Environmental and social management matrix, comprised of mitigation and monitoring tables, should identify estimated costs of key types of mitigation measures, parties responsible for application mitigation measures and for undertaking monitoring of ESMP's implementation.

It is essential that the table of mitigation measures names specific types of activities requiring mitigation, prescribes specific measures for mitigating risks associated with individual types of activities, and provides concrete measurable indicators against which the success of mitigation will be measured.

ESMPs must cover both – construction and operation phases of a subproject.

Checklist Environmental and Social Management Plan for Small Construction and Rehabilitation Activities (***Attachment 3***) will be used for the preparation of ESMPs. It is a template to be filled in with short information about the location of a subproject site, physical and natural environment around it, land ownership, legislation pertaining subproject implementation, and the specific types of activities required for a subproject implementation. The Checklist provides readily available generic set of mitigation measures applicable to various types of activities, which may be slightly adjusted to a specific subproject as need be. Environmental and social monitoring plan has to be developed following the suggested table format.

Present ESMF as well as subproject specific ESMPs may be revised in agreement with the World Bank from time to time in case new circumstances emerge in the life of the Project. Adaptive management of risks and impacts should be applied for keeping environmental and social management instruments relevant and for optimizing resources.

Selected works contractors will have to submit to the Open Net soon after contract signing their ESHS plans detailing how they plan to implement ESMP provided by the Open Net. This would include, but not be limited to:
(i) what kind of environmental permits, licenses, agreements are held by contractor or will be obtained (from which entity and by when);
(ii) technical specifications of on-site safety installations (fencing, barricading, signage, illumination, etc.),
(iii) health and safety training plan for personnel,
(iv) types of personal protective gear to be used at work sites,
(v) design of information boards to be erected near work sites to be used by local communities for communication, etc.).

Technical supervisor of works, if services of such company are being used by Open Net, will review and assure quality of contractors' EHS plans and have them updated periodically as need may be.

11. Public Consultation and Citizen Engagement in Social and Environmental Risk Management

Participatory approach to framing environmental and social governance under Log-in Georgia Project as well as for planning of environmental and social impact mitigation is essential for ensuring quality and realism of safeguard documents.

Draft versions of ESMF, RPF, SEP, LMP and ESCP were disclosed through the web page of Open Net and sent by mail to the respective regional administrations (57 municipalities where the Log in Georgia route will be going through) in Georgian and English languages, as well as to MoESD, MEPA, NACHP, local NGOs and private sector, including local Internet Service Providers (ISPs) who believed to be interested in being a part of the Log-in Georgia Project.

Virtual consultation with the government and non-government stakeholders on the draft ESMF, RPF and SEP was hosted by Open Net through WebEx sessions on July 24 and August 14, 2020. The documents were finalized thereafter. Records of the stakeholder consultation process are attached to the present ESMF (***Attachment 5***).

Present updated ESMF on June 27, 2025.

Site-specific ESMPs will be disclosed in two languages on the Open Net's web page, and hard copies in Georgian will be delivered to the administrative centers closest to the subproject sites.

Draft ESMPs will be disclosed in Georgian and English languages and public consultation meetings on the draft ESMPs will be held by Open Net. Representatives of Project Steering Committee and

Project Coordination Group will be invited to the consultation meetings. Local communities will be notified on the availability of these hard copies as well as on the means of communicating their feedback on ESMPs. Public consultation meetings with subproject-affected people will be held in the vicinity of subproject sites selected to guarantee easy access of stakeholders. Contact information for submitting questions, feedback or grievances of Open Net will be distributed during public consultations and displayed thereon at a visible location throughout the duration of the Project.

Detailed record of public consultation process will be kept. Minutes of all meetings held will be produced including the following information:[3]

- What announcement was made on the meeting, through what media, and on what date
- What was the time and venue of a meeting held;
- How many attendees were in the meeting and type of attendees (e.g. parents, teachers, etc.);
- What was agenda of the meeting (including, as minimum, key expected environmental and social impacts, mitigation measures, grievance redress mechanism);
- Who were key speakers and what aspects did they cover; and
- What were the main types of questions asked by local residents, and how these questions were entertained.

Minutes should be supported with photo material taken during consultation and lists of attendees with their contact information and original signatures.

The site-specific ESMPs will be finalized with incorporation of adequate feedback and re-disclosed along with the minutes of consultation meetings attached.

Consultations with Project-affected communities (public and private institutions, local residents and authorities, ISPs, worker and trade unions, civil society organizations, potential investors, educational institutions, vulnerable groups) will continue during the construction phase as well as after its completion under the component 2 managed by ComCom and records of environmental and social issues raised, and complaints received during consultations, field visits, informal discussions, formal letters, etc., will be followed up. The records will be kept in the Project office in the Open Net.

12. Environmental and Social Monitoring

Environmental and social monitoring is an integral part of the Open Net's supervisory work in the course of the Project implementation.

[3] Minutes of public consultation meetings are provided in Annex 1

Open Net is responsible to ensure that on-site managers of works contractors are familiar with ESMPs and instruct workers/personnel on the compliance with these ESMPs.

Open Net demands from works contractors' timely submission of environmental permits for the operation of asphalt/concrete plants (if owned); licenses for the extraction of rock, gravel, and sand (if operating quarries); and written agreements with local authorities on the disposal of waste. In addition to full-time quality assurance and monitoring of works by specialists, Open Net conduct regular on-site monitoring of civil works to verify contractors' adherence to the requirements set out in ESMPs, to identify any outstanding environmental issues or risks, and to ensure proper application of the prescribed remedial actions. In case of recorded incompliance with ESMPs, Open Net will instruct contractors on the corrective measures and closely monitor their further progress.

Open Net may procure an international construction supervision company. Oversight on the environmental, cultural, and social aspects of construction works will be an integral part of the terms of reference for such supervision company.

13. Grievances Redress Mechanism

During implementation of the subprojects, there might be several issues related to environmental hazards and disputes on entitlement processes may occur due to the Project activities. For example, an intensive schedule of construction activities; inappropriate timing of construction vehicle flow; waste; noise and air pollution from construction activities; ecological disturbances; compensation or other resettlement and environmental issues that are likely to arise from the Project activities.

According to the existing legal and administrative system in Georgia, there are several entities responsible for addressing environmental complaints of the population and interested parties. The administrative bodies directly responsible for environmental protection within the subproject areas are MEPA and municipalities administrations. The affected population and stakeholders may send their grievances related to the project-induced environmental impacts directly to the mentioned administrative bodies responsible for environmental protection.

A Grievance Redress Mechanism (GRM) will be set up for the Project to deal with both the environmental and social issues of the subprojects. Grievances can be submitted either on site by using grievance box or using other channels such as e-mail, phone number, web page. The grievance forms will be available on site and stakeholders can fill anonymous complaints if needed. If grievances are submitted on site, Contractor Company will be responsible for logging complaints and solving them according to Stage 1. In case the Contractor cannot solve the complaint, Open Net will be involved in the process as it is described on Stage 2. The Supervision

Company will be responsible for receiving a complaint log from Contractor Company and sharing it to Open Net. Stakeholders have the opportunity to use one of the stages for submitting grievances. They can directly apply to stage 2.

All verbal or written complaints or grievances will be logged immediately upon receipt by Contractors or to Open Net. Complaints will be responded according to the national legislation of Georgia. Individuals can request the right to have their name kept confidential and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

Grievances submitted will be solved and followed-up in accordance with the procedures given below:

Stage 1 – Contractor Company with Supervision Company receives and solves complaints. If at Stage 1 the project-affected person's (PAP) complaint is not solved, the PAP should be informed about grievance resolution procedures of Stage 2. The PAP has the right to use the procedures of Stage 2 without applying Stage 1 procedures. Open Net will be aware of all the grievances submitted at Stage 1 through the logbook and will monitor their resolution remotely.

Stage 2 – Open Net receives and solves complaints of PAP's which were not satisfied at the Stage 1. GRC exists at Open Net and on a need basis GRC shall make decision in compliance with the Administrative Code of Georgia

A PAP has the right to apply to the Court in case his/her complaint was not resolved on the Stage 1 and Stage 2.

Grievance redress procedures of Stage 1 are an informal tool of dispute resolution allowing the PAPs and Project implementation team to resolve the disagreement without any formal procedures, procrastination and impediments. The international experience of resettlement shows that such informal GRM helps to solve most of the complaints without formal procedures (i.e. without using the procedures specified in the Administrative Code or litigation). This mechanism enables unimpeded implementation of the Project and timely satisfaction of complaints.

PAPs shall be fully informed of the grievance redress mechanism, its functions, procedures, contact persons and rules of making complaints through oral information and booklets during the public consultation meetings. Contact information regarding GRM focal points will be available on the informational banners on the construction site. Every verbal/written complaint will be recorded, and grievance log managed by the Citizen and stakeholder Engagement Manager at Open Net.

The GRM will be sensitized to grievances related to sexual exploitation and abuse and sexual harassment (SEA/SH) to ensure confidential handling of such grievances and appropriate referral. To this end, Open Net will develop an information sharing and referral protocol relating the SEA/SH grievances and hold awareness sessions for all Project staff and consultants who may interact with the Project GRM to ensure their familiarity with this protocol.

14. Reporting

Documenting outcomes of the environmental and social supervision of subprojects is mandatory. Monthly monitoring reports will be generated by filling out field environmental and social monitoring checklists (***Attachment 4*** to this ESMF), reflecting quality and extent of the application of each mitigation measure prescribed by ESMPs. The information provided in checklists should be supported with photo material taken on-site and dated.

Environmental chapters of biannual progress reports on the Project implementation shared with the World Bank will carry more comprehensive, analytical information on the status of environmental performance under the Log in Georgia Project, including overview of deviations/violations of ESMPs encountered over the report period, instructions given to the works contractors for addressing any weaknesses or identified issues, and follow-up actions on the revealed outstanding matters.

Social chapter of the biannual progress reports will include a short description of the reasoning why projects did/did not trigger the application of the RPF, and the status of the application of different social safeguards provisions. Summaries of consultations, status of compensation to PAPs, status of livelihoods restoration activities and challenges in the implementation of RAPs will also be described. A list of projects expected to trigger the application of the RPF in the upcoming quarter will also be included.

Prompt notification of the World Bank on any accidents, emergencies, and unforeseen issues which may occur in the course of works and directly or indirectly affect environment, physical cultural resources, personnel of works providers, and or communities residing in the vicinity of a project site is mandatory regardless of timelines of reporting. Unexpected negative social impacts identified during Project implementation will also be reported. The construction supervision company and their staff will be responsible for monitoring such negative impacts during their supervision visits.

Attachment 1. Environmental Screening and Classification of Subprojects

(A) IMPACT IDENTIFICATION

Has subproject a substantial or high impact on the environment?	
What are the expected beneficial and adverse environmental impacts of subproject?	
May the subproject have any substantial or high impact on the local communities and other affected people?	

(B) MITIGATION MEASURES

Were there any alternatives to the subproject design considered?	
What types of mitigation measures are proposed?	
What lessons from the previous similar subprojects have been incorporated into the project design?	
Have concerned communities been involved and how have their interests and knowledge been adequately taken into consideration in subproject preparation?	

(D) CONCLUSION

1. Subproject is declined[4] ☐
2. Subproject is accepted ☐

Subproject preparation requires Completion of the Checklist Environmental and Social Management Plan for Small Construction and Rehabilitation Activities ☐

[4] If a subproject has substantial or high impacts on the environment and/or communities, it is ineligible for the Project support. Only activities with low or moderate risks may be funded from the Project proceeds.

Attachment 2. Social and Cultural Resource Screening of Subprojects

Social safeguards screening information		Yes	No
1	Is the information related to the affiliation, ownership and land use status of subproject site available and verifiable? (The screening cannot be completed until this is available)		
2	Will subproject reduce other people's access to their economic resources, such as land, pasture, water, public services or other resources that they depend on?		
3	Will subproject result in resettlement of individuals or families or require the acquisition of land (public or private, temporarily or permanently) for its development?		
4	Will subproject result in the temporary or permanent loss of crops, fruit trees and household infra-structure (such as ancillary facilities, fence, canal, granaries, outside toilets and kitchens, etc)?		
If answer to any above question (except question 1) is "Yes", then **ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement** is applicable and mitigation measures should follow this ESS and the **Resettlement Policy Framework**			
Cultural resources safeguard screening information		**Yes**	**No**
5	Will the project require excavation near any historical, archaeological or cultural heritage site?		
If answer to question 5 is "Yes", **then** possible chance finds must be handled in accordance **with relevant procedures provided in the Environmental and Social Management Framework**			

Attachment 3. Checklist Environmental and Social Management Plan for Small Construction and Rehabilitation Activities

General Guidelines for use of ESMP checklist:

For low-risk topologies, such as broadband internet network arrangement activities, the World Bank safeguards team developed a streamlined approach to preparing ESMPs for minor rehabilitation or small-scale works in building construction, in the health, education and public services sectors. The checklist-type format has been developed to provide "example good practices" and designed to be user friendly and compatible with ESF requirements.

The EMP checklist-type format covers typical core mitigation approaches to civil works contracts with small, localized impacts. It is accepted that this format provides the key elements of an Environmental and Social Management Plan (ESMP) or Environmental and Social Management Framework (ESMF) to meet World Bank Environmental Assessment requirements under ESS1. The intention of this checklist is that it would be applicable as guidelines for the small works contractors and constitute an integral part of bidding documents for contractors carrying out small civil works under Bank-financed projects.

The checklist has three sections:

Part 1 includes a descriptive part that characterizes the project and specifies in terms the institutional and legislative aspects, the technical project content, the potential need for capacity building program and description of the public consultation process. This section could be up to two pages long. Attachments for additional information can be supplemented when needed.

Part 2 includes an environmental and social screening checklist, where activities and potential environmental issues can be checked in a simple Yes/No format. If any given activity/issue is triggered by checking "yes", a reference is made to the appropriate section in the following table, which contains clearly formulated management and mitigation measures.

Part 3 represents the monitoring plan for activities during project construction and implementation. It retains the same format required for ESMPs proposed under normal Bank requirements for Category B subprojects. It is the intent of this checklist that Part 2 and Part 3 be included into the bidding documents for contractors, priced during the bidding process and diligent implementation supervised during works execution.

CONTENTS OF ESMP

A) General Project and Site Information

B) Safeguards Information

C) Mitigation Measures

D) Monitoring Plan

PART A: GENERAL PROJECT AND SITE INFORMATION

INSTITUTIONAL & ADMINISTRATIVE			
Country			
Project title			
Subproject title			
Scope of site-specific activity			
Institutional arrangements (WB)	Task Team Leader: (insert)	E&S Specialists: (insert)	
Implementation arrangements (Borrower)	Implementing entity: (insert)	Works supervisor: (tbd)	Works contractor: (tbd)
SITE DESCRIPTION			
Name of institution whose premises are to be rehabilitated			
Address and site location of institution whose premises are to be rehabilitated			
Who owns the land? Who uses the land (formal/informal)?			
Description of physical and natural environment, and of the socio-economic context around the site			
Locations and distance for material sourcing, especially aggregates, water, stones?			
LEGISLATION			
National & local legislation & permits that apply to project activity			
PUBLIC CONSULTATION			
When / where the public consultation process will take /took place			
ATTACHMENTS			
Attachment 1: Site plan / photo Attachment 2: Construction permit (as required) Attachment 3: Agreement for construction waste disposal Other permits/agreements – as required			

PART B: SAFEGUARDS INFORMATION

ENVIRONMENTAL /SOCIAL SCREENING			
Will the site activity include/involve any of the following?	**Activity/Issue**	**Status**	**Triggered Actions**
	1. Building rehabilitation	[ ] Yes [ ] No	See Section **A** below
	2. New construction	[ ] Yes [ ] No	See Section **A** below
	3. Individual wastewater treatment system	[ ] Yes [ ] No	See Section **B** below
	4. Historic building(s) and districts	[ ] Yes [ ] No	See Section **C** below
	5. Acquisition of land[5]	[ ] Yes [ ] No	See Section **D** below
	6. Hazardous or toxic materials[6]	[ ] Yes [ ] No	See Section **E** below
	7. Traffic and Pedestrian Safety	[ ] Yes [ ] No	See Section **F** below
	8. Social Risk Management	[ ] Yes [ ] No	See Section **G** below

[5] Land acquisition includes displacement of people, change of livelihood encroachment on private property this is to land that is purchased/transferred and affects people who are living and/or squatters and/or operate a business (kiosks) on land that is being acquired.

[6] Toxic / hazardous material includes but is not limited to asbestos, toxic paints, noxious solvents, removal of lead paint, etc.

PART C: MITIGATION MEASURES

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
0. General Conditions	Notification and Worker Safety	(a) Notify local construction and environment inspectorates and communities on the upcoming activities (b) Notify public on the works through appropriate notification in the media and/or at publicly accessible sites (including the site of the works) (c)Acquire all legally required permits for construction and/or rehabilitation (d) Formally agree with Employer that all work will be carried out in a safe and disciplined manner designed to minimize impacts on neighboring residents and environment. (e) Ensure that workers' PPE complies with international good practice (always hardhats, as needed masks and safety glasses, harnesses and safety boots) (f) Appropriately signpost construction site to inform workers on key rules and regulations.
A. General Rehabilitation and /or Construction Activities	Air Quality	(a) Suppress dust during pneumatic drilling/wall destruction by ongoing water spraying and/or installing dust screen enclosures at site (b) Keep the surrounding environment (sidewalks, roads) free of debris to minimize dust (c) Disallow open burning of construction / waste material at the site (d) Disallow excessive idling of construction vehicles at sites
	Noise	(a) Limit construction noise to daytime unless extreme urgency. Notify local communities on the works schedule if it deviates from standard working hours (b) Ensure that during operation, engine covers of generators, air compressors and other powered mechanical equipment are closed, and equipment placed as far away from residential areas as possible
	Water Quality	(a) 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) Identify waste collection and disposal pathways for all major waste types expected from demolition and construction activities (b) Separate mineral construction and demolition wastes from general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers. (c) Collect construction waste and dispose properly to the designated locations (d) Whenever feasible, reuse and recycle appropriate and viable materials (except asbestos)

B. Individual wastewater treatment system	Water Quality	(a) Ensure that the approach of handling sanitary wastes and wastewater and the design of the treatment system is approved by relevant authorities (b) Ensure that before discharging into receiving waters, effluents from individual wastewater systems are treated in order to meet the minimal quality criteria set out by national guidelines on effluent quality and wastewater treatment (c) Undertake monitoring of newly established wastewater treatment systems and report to Employer on the monitoring outcome (d) Wash construction vehicles and machinery only in designated areas where runoff will not pollute natural surface water bodies
C. Cultural Heritage sites /buffer zones	Cultural Heritage	(a) If the cable ducks or shelters will be arranged within buffer zone of cultural heritage site, prior consent of the Ministry of Culture should be obtained. all construction activities are planned and carried out in line with local and national legislation (b) Acquaint personnel with the procedures for handling chance finds. Take all physical activity on hold if a change find is suspected or reported by staff and immediately notify Employer in writing. Do not resume work until formal notice from the Employer
D. Acquisition of land	Land Acquisition Plan/Framework	(a) If expropriation of land was not expected but is required, or if loss of access to income of legal or illegal users of land was not expected but may occur, immediately consult the World Bank's Task Team Leader (b) Make sure not to enter a subproject site and not to start any physical activity in it prior to receiving formal notice on the completion of resettlement and full delivery of compensation to the affected people
E. Toxic Materials	Asbestos management	(a) If asbestos is located on the subproject site, mark it clearly as hazardous material (b) When possible, appropriately contain and seal asbestos to minimize exposure (c) Treat asbestos prior to removal (if removal is necessary) with a wetting agent to minimize asbestos dust (d) Handle and disposed asbestos using skilled & experienced professionals (e) If asbestos material is being stored temporarily, securely enclosed it inside closed containments and mark appropriately. Take security measures against unauthorized removal from the site (f) Do not reuse the removed asbestos

	Toxic / hazardous waste management	(a) Temporarily store all hazardous or toxic substances on site in safe containers labeled with details of composition, properties and handling information (b) Place containers of hazardous substances in leak-proof containers to prevent spillage and leaching (c) Transport waste to official landfills and dispose excess excavated material at sites agreed with the local authorities (d) No not use paints with toxic ingredients or solvents, or lead-based paints
F. Traffic and Pedestrian Safety	Direct or indirect hazards to public traffic and pedestrians by construction activities	(a) Signpost, place warning signs, arrange barriers and traffic diversions so that the work site is clearly visible, and the public is warned of all potential hazards (b) Establish traffic management system and conduct staff training, especially for site access and near-site heavy traffic. Provide safe passages and crossings for pedestrians where construction traffic interferes (c) Adjust working hours to local traffic patterns, e.g. avoid major transport activities during rush hours or times of livestock movement (d) Actively manage traffic if required for safe and convenient passage for the public
G. Social Risk Management	Public relationship management	(a) Assign local liaison person within Contractor's team to be in charge of communication with and receiving requests/ complaints from local population (b) Consult local communities to identify and proactively manage potential conflicts between an external workforce and local people (c) Raise local community awareness about sexually transmitted disease risks associated with the presence of an external workforce and include local communities in awareness activities. (d) Inform the population about construction and work schedules, interruption of services, traffic detour routes and provisional bus routes, blasting and demolition, as appropriate (e) Limit construction activities at night. When necessary ensure that night work is carefully scheduled, and the community is properly informed, so they can take necessary measures. (f) At least five days in advance of any service interruption (including water, electricity, telephone, bus routes), advice community through postings at the work site, at bus stops, and in affected homes/businesses (g) Address concerns raised through Grievance Redress Mechanism established by the Employer within the designated timeline within the scope of Contractor's liability (h) To the extent possible, do not locate work camps in close proximity to local communities (i) Undertake siting and operation of worker camps in consultation with neighboring communities

	Labor management	(a) Recruit unskilled or semi-skilled workers from local communities to the extent possible. Where and when feasible, worker skills training, should be provided to enhance participation of local people (b) Provide adequate lavatory facilities (toilets and washing areas) in the work site with adequate supplies of hot and cold running water, soap, and hand drying devices. A temporary septic tank system should be established for any residential labor camp and without causing pollution of nearby watercourses (c) Raise awareness of workers on overall relationship management with local population, establish the code of conduct in line with international practice and strictly enforce them, including the dismissal of workers and financial penalties of adequate scale (d) Immediately inform technical supervisor of works and the employer about any accidents/incidents happening at work sites and/or resulting from any contractual activity of works provider which has resulted in tangible damage to human and/or environmental health, including but not limited to trauma or death at work site, traffic accident, emergency emission/pollution of environment with hazardous substances, etc.

PART D: MONITORING PLAN

Activity	What (Is the parameter to be monitored?)	Where (Is the parameter to be monitored?)	How (Is the parameter to be monitored?)	When (Define the frequency / or continuous?)	Why (Is the parameter being monitored?)	Who (Is responsible for monitoring?)
CONSTRUCTION PHASE						
1.						
2.						
n.						
OPERATION PHASE						
1.						
2.						
n.						

Attachment 4. Monthly Field Environmental Monitoring Checklist

Site location					
Name of contractor					
Name of supervisor					
Date of site visit					
Status of civil works					
Documents and activities to be examined	Status				Comments
	Yes	Partially	No	N/A	
Contractor holds license for extraction of natural resources					
Contractor holds permit for operating concrete/asphalt plant					
Contractor holds agreement for final disposal of waste					
Contractor holds agreement with service provider for removal of household waste from site					
Work site is fenced, and warning signs installed					
Traffic is regulated with sufficient warning and signalling signage sufficient for timely slowdown, safe bypassing of temporary barriers and night-time visibility					
Works do not impede pedestrian access and motor traffic, or temporary alternative access is provided					
Working hours are observed					
Construction machinery and equipment is in standard technical condition (no excessive exhaust and noise, no leakage of fuels and lubricants)					
Construction materials and waste are transported under the covered hood					

Construction site is watered in case of excessively dusty works					
Contractor's camp or work base is fenced; sites for temporary storage of waste and for vehicle/equipment servicing are designated					
Contractor's camp is supplied with water and sanitation is provided					
Contractor's camp or work base is equipped with first medical aid and fire-fighting kits					
Workers wear uniforms and protective gear adequate for technological processes (gloves, helmets, respirators, eyeglasses, etc.)					
Servicing and fuelling of vehicles and machinery is undertaken on an impermeable surface in a confined space which can contain operational and emergency spills					
Vehicles and machinery are washed away from natural water bodies in the way preventing direct discharge of runoff into the water bodies					
Construction waste is being disposed exclusively in the designated locations					
Extraction of natural construction material takes place strictly under conditions specified in the license					
Excess material and topsoil generated from soil excavation are stored separately and used for backfilling / site reinstatement as required					
Works taken on hold if chance find encountered and communication made to the State agencies responsible for cultural heritage preservation					

Upon completion of physical activity on site, the site and contractor's camp/base cleared of any remaining left-over from works and harmonized with surrounding landscape					

Attachment 5. Minutes of Public Consultation
on the draft Environmental and Social Management Framework, Resettlement Policy Framework and Stakeholder Engagement Plan

July 24, 2020

Public consultation on the draft Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan and the Resettlement Policy Framework (RPF) was held on July 24, 2020, through the webex link organized by the Open Net. The invitation to the consultation was sent in advance to the stakeholders and was posted online on the website of Open Net.

The virtual meeting was hosted by the Open Net and had 15 participants representing Samtredia Municipality, Small and Medium Telecom Operators, Magti and Parvus Group. The World Bank representatives were also connected.

The meeting lasted for 45 minutes. The first part of it was used to describe the ESMF,RPF and SEP to the stakeholders, to introduce public to the World Bank ESF and explain which ESSs apply to Log In Georgia Project and why, to characterize environmental and social risks associated with the Project and explain how these risks will be avoided, minimized or mitigated in the course of construction and operation of the Project-supported infrastructure. Thus, the stakeholders acquired a better picture of what Open Net is aiming to achieve through environmental and social management of the forthcoming activities and became better positioned to provide comments and/or ask questions for clarification.

In the second part of the meeting, time was allowed for a questions-and-answers' session. Some questions were asked by Samtredia municipality and one of the representatives of the Small and Medium Telecom Operators. The questions were of rather a general nature but with a touch on the environmental issues. The municipality told us that they would have more questions once the High-Level Design of the Project is produced, and they have a better understanding of where the construction works would take place. Open Net told them that they will always be kept up to date on the Project developments and all relevant information will always be available online or other sources (such as local municipalities, worksites, etc.). Also promise was made to have meetings like this on regular basis throughout the Project implementation as well and, hopefully, in a face-to-face manner once the COVID-19 pandemic subsides. The second question was regarding the language of Project documentation: will the documents continue to be produced in Georgian and English. Open Net confirmed that all documentation will be bilingual, so that every stakeholder will have a chance to read it.

The meeting closed with an agreement that a 3-week period would be allowed for the submission of additional questions/suggestions from stakeholders. Communication would be held by e-mail. Another consultation session would then be held, and the feedback received through virtual consultation meetings and by mail would be used to update the ESMF, SEP and RPF.

The second virtual consultation meeting was supposed to be held after three weeks, on August 14, 2020. Open Net did not receive any questions or comments regarding draft documents under consideration, hence it was decided to continue with current documents and update them over time with future meetings that will happen.

Stakeholder engagement into Project implementation will continue throughout its implementation according to the SEP prepared for Log In Georgia Project.