Program Safeguard Systems Assessment

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SRI: Skills Development System Transformation Program

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PROGRAM SAFEGUARD SYSTEMS ASSESSMENT

A. Program Environmental and Social Impacts and Risks

1. Sri Lanka's progress in skilling its workforce faces a shortage of trained workers in the industrial and service sectors, while its young population is not ready for jobs. Youth unemployment rate in Sri Lanka slightly decreased to 19.2% in the third quarter of 2025 from 22.40% in the first quarter of 2023.[1] Youth Unemployment Rate in Sri Lanka averaged 24.63% from 1992 until 2023. The Asian Development Bank (ADB), through its results-based lending (RBL) modality, is supporting the Government of Sri Lanka to strengthen skills development and technical and vocational education and training (TVET) sector through the proposed Skills Development System Transformation Program (SDSTP).

2. As envisaged under Output 2, increasing the provision of employment-oriented and quality-assured TVET requires expanding access to high-quality, demand-driven skills training aligned with labor market needs. Accordingly, civil construction works will be undertaken to upgrade selected public TVET institutes into regional training hubs to enhance practical training capacity. In addition, a national TVET Center of Excellence in the automotive sector will be established to pilot industry-aligned training models, advanced curricula, and quality assurance practices. The structural component of upgrading TVET institutes will generally involve the renovation, retrofitting, rehabilitation, or expansion of existing buildings and structures, together with improvements to the surrounding areas and associated facilities. The Automobile Engineering Training Institute at Orugodawatta will require the vertical expansion of an existing building, for which structural provisions were incorporated into the original design to accommodate future vertical expansion.

3. **Environmental impacts and risks**: The program safeguard systems assessment (PSSA) examined regulatory framework, and implementation practice of the country safeguard system and principles of the ADB's Safeguard Policy Statement (SPS) 2009, including an evaluation of institutional capacity of the Ministry of Education, Higher Education and Vocational Education (MOEHEVE or the ministry). All TVET institutes are located close to urbanized cities to make easy access to the students and staff, and to facilitate public utilities such as safe water, electricity, communication, public transport, accommodation, etc. The subprojects for upgrading TVET institutes are expected to generate substantial positive outcomes by providing a healthy and safe learning environment within the institutions and environmentally sustainable infrastructure and facilities outside the classrooms. Field observations, stakeholder consultations, and mission meetings with Ministry officials confirmed that: (i) civil works are limited to the upgrading of existing institutional buildings and associated infrastructure; (ii) all construction activities will be confined within the premises of TVET institutions enclosed by boundary walls or fences; (iii) the institute premises are sufficiently large to accommodate construction activities and associated site facilities without disrupting ongoing educational activities or affecting surrounding communities; and (iv) the institutes are not located within protected areas, environmentally sensitive areas, or sites of physical cultural heritage. Further, field visits and stakeholder consultations conducted at the institutional level (Appendix 1) identified the following pre-existing issues, which vary according to site-specific conditions and are not applicable to every TVET institution; none of these issues was considered significant enough to constitute a safeguard system gap: (i) stormwater stagnation during the rainy season; (ii) wastewater stagnation due to inadequate maintenance; (iii) leftover construction aggregates scattered within the site premises and

[1] Trading and Economics. Sri Lanka Youth Unemployment Rate.

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dismantled materials, including timber, steel, and cement asbestos sheets, in temporary stores; (iv) partially completed structures accessible to students; (v) poorly maintained sanitation facilities, electrical wiring, fittings, and installations; and (vi) roof leaks and damaged roof drainage systems. These deficiencies can be rectified through routine maintenance of the institutional facilities during the operational phase.

4. During the field visits as part of this PSSA, the Ministry was in the process of finalizing the scope of upgrading works for the individual TVET institutions and stakeholder consultations focused on the overall upgrading of buildings and associated infrastructure of the TVET institutes. Accordingly, the potential adverse environmental impacts and risks are commonly associated with building and infrastructure upgrading works and are expected to be limited in scale, extent, and duration. Nevertheless, careful planning and implementation of mitigation measures are essential, as construction activities will be undertaken while educational programs continue. Potential adverse environmental impacts/ risks include dust and noise pollution, construction related disturbances, occupational health and safety risks, and construction waste management. These impacts are site-specific and temporary, occurring only during the construction phase. They include: (i) dust generation from site clearing, stockpiles of fine aggregates, and building preparation for upgrading works; (ii) elevated noise levels resulting from the movement and operation of construction vehicles and equipment within institute premises; (iii) construction-related nuisances, including dust, noise, and vibration, that may disrupt teaching and learning activities, as civil works will be undertaken within occupied buildings while educational programs continue; (iv) occupational health and safety risks to project workers; and (v) improper management of construction waste and solid waste, together with inadequate site restoration following the completion of construction activities. Implementation of awareness programs for students and staff, together with the dissemination of safety guidelines and the provision of site safety measures—including safety signage, temporary barriers, safe pedestrian access, and enforcement of health and safety requirements—can significantly mitigate these impacts. Since the impacts will be short-term confined to the construction phase, the proposed activities of subprojects are classified as Category B or Category C for environmental safeguards. Under the PBL requirements, sub projects classified as Category A on environmental safeguard are excluded from the program. Above issues and measures were identified through consultations with the heads and administrative staff of the TVET institutions, together with observations made during the field visits. These issues and measures were further presented and discussed during the ADB mission meetings attended by Ministry officials, led by the Additional Secretary. A copy of the draft PSSA was also shared with the Additional Secretary for review and comments. Consultations at the Ministry level were conducted in English. During the field visits, both English and local languages were used to facilitate effective communication and to ensure the meaningful participation of stakeholders with limited English proficiency. The Ministry agreed that the PSSA be disclosed on ADB and Ministry web sites. Ministry officials and institutional staff participating in the field visits and consultations emphasized the importance of incorporating environmental considerations into the construction activities associated with the proposed institutional upgrading.

5. **Involuntary Resettlement (IR)**: The program will exclude sub projects requiring land acquisition or result in IR impacts. Consultations with the administrations of the TVET institutes during the field visits confirmed that the institutions and their surrounding premises are owned by the Government. The premises of each TVET institute are physically separated from the surrounding areas, and each institute has sufficient vacant land within its premises, outside the existing buildings, to accommodate future development. Consequently, implementation of the subprojects will not require land acquisition, physical displacement, or economic displacement, and the program is classified as Category C for involuntary resettlement (IR).

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6. **Indigenous People (IP)**: The program will not finance any subproject that is likely to have adverse impacts on the livelihoods, rights, or cultural identity of Indigenous Peoples, where present. The Sinhalese are the majority and historically rooted ethnic community in Sri Lanka, accounting for approximately 75% of the total population, while the remainder comprises approximately 15% Tamils, 9% Muslims, and 1% other ethnic groups. A small indigenous forest-dwelling community, historically known as the Veddas, are also referred to as Vanniyala-Eththo ("forest people") or Adivasi. They are citizens of Sri Lanka and constitute a very small proportion of the national population, estimated at approximately 1,373 (0.006%) persons in 2024 out of a total national population of about 21.7 million.[2] All communities of Sri Lanka are recognized as citizens under the Citizenship Act of 1948 and are entitled to the rights and privileges guaranteed by the Constitution of the country. The Constitution does not formally recognize any group or community as IPs. Nevertheless, the program activities do not directly or indirectly target this community settled in Dambana of Uva Province and Ratugala in Eastern province. Accordingly, IPs' safeguard triggers category C. The Vanniyala-Eththo community, as citizens of Sri Lanka, is eligible to access and benefit from TVET courses offered by these institutes.

B. Safeguards Principles Triggered

7. The safeguards principles likely to be triggered because of the program activities and alignment with the program safeguards are in Table 1. The program will trigger nine (09) out of eleven (11) environmental safeguards policy principles (except policy principle 8 on critical habitats and policy principle 11 on physical cultural resources). Further, the program will not trigger involuntary resettlement safeguards policy principles except policy principle 1 on screening and categorization. The constitution of the country has not categorized any ethnic group as Indigenous Peoples. A comparison of ADB's SPS (2009) with the program's relevant regulatory frameworks and practices for environmental safeguards is in Appendix 2.

Table 1. Safeguard Policy Principles Triggered

Principles	Description	Significant Gaps, if any, Requiring Program Actions
Principle 1: Project screening process	**Triggered.** Program safeguards, incorporating provisions obtained from the NEA regulations implemented by CEA (stipulated in CSS) will be implemented. The program screening and categorization will be undertaken through BIQ (as per NEA), and REA categorization checklists presented in Appendix 3 (as per ADB, SPS) focusing on same objectives. The program will not finance activities listed in ADB PIAL presented in Appendix 5 of ADB, SPS.	None
Principle 2: Conduct of environmental assessment	**Triggered**. Environmental Category A subprojects will be excluded from the program. Environmental assessments will be conducted of all Category B subprojects. Regardless of environmental categorization, all subprojects shall comply with applicable national requirements relating to pollution prevention and control, occupational health and safety, community health and safety, and grievance handling. These requirements shall	None

[2] Ministry of Finance, Planning, and Economic Development. Department of Census and Statistics. Census of Population and Housing - 2024 Final Report.

Principles	Description	Significant Gaps, if any, Requiring Program Actions
	be incorporated into the contract documents through a site-specific EMP. In addition, all program-supported subprojects—except those with a contract value below USD 4,500, which require only an environmental impact checklist—shall be supported by an EMP. The threshold value may be revised during the preparation of the program procurement plan	
Principle 3: Examine alternatives to the project	**Triggered.** All civil work is limited to infrastructure facilities within the existing TVET premises. Site alternative is not possible. However, design, technology, and construction methodology options will be considered.	None
Principle 4: Avoid, minimize, mitigate, and/or offset adverse impacts and preparation of EMP with monitoring and reporting requirements	**Triggered.** The mitigation hierarchy will be implemented. A generic EMP is included in the PSSA (Appendix 4) which will serve as the basis to be further updated into site-specific construction EMP.	There are no significant gaps. However, institutional measures should be taken to strengthen the capacity of supervisory staff to apply the mitigation hierarchy and preparation of site-specific EMP with monitoring and reporting requirements (Actions 2, and 4 of Table 2)
Principle 5: Carry out meaningful consultation and grievance redress	**Triggered**. Consultations with stakeholders will continue throughout the program implementation as necessary as stipulated in local regulations, particularly to address issues related to safeguarding the health and safety of students, staff, and visitors while construction activities are undertaken alongside ongoing educational programs.	Although grievance redress mechanism is in place under labor laws and regulations, resolving grievances can be a lengthy and time-consuming process. A specific project of GRM is included in Appendix 5 of the PSSA (Action 3 of Table 2).
Principle 6: Disclose a draft environmental assessment (including EMP)	**Triggered**. Information disclosure is required under NEA as well as ADB, SPS. The environmental assessments including EMPs will be disclosed on the website of MOEHEVE and ADB. These documents will be made available at selected TVET institutes and centers.	None
Principle 7: Implement EMP and monitor its effectiveness	**Triggered**. Site-specific construction EMP will be implemented by the contractor/s. MOEHEVE will monitor its implementation and ensure that any non-compliance or deficiencies are addressed through timely corrective actions. .	There are no significant gaps. However, MOEHEVE shall ensure the effective implementation of the EMP, undertake regular monitoring, review environmental performance during progress review meetings, take timely corrective actions where necessary, and submit periodic environmental monitoring reports in a timely manner (Actions 2 and 4 of Table 2)

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Principles	Description	Significant Gaps, if any, Requiring Program Actions
Principle 8: Avoidance of critical habitats	**Not Triggered**. The program activities are implemented within existing TVET centers which are located outside any environmentally sensitive areas (including any critical habitats).	None
Principle 9: Apply pollution prevention and control technologies and practices	**Triggered**. Compliance with the standards prescribed under the CEA regulations and applicable local government regulations shall be ensured through the implementation of site-specific construction EMPs during civil work.	There are no significant gaps. However, institutional measures should be taken to strengthen the capacity of contractors' personnel and to comply with applicable national regulations as a condition of contract (Actions 1, 2 and 4 of Table 2)
Principle 10: Workers' health and safety	**Triggered**. Compliance with the standards prescribed under the labor regulations and applicable local government regulations shall be ensured through the implementation of site-specific construction EMPs during civil works	There are no significant gaps. However, institutional measures should be taken to strengthen the capacity of contractors' personnel and to comply with applicable national regulations as a condition of contract (Actions 1, 2 and 4 of Table 2)
Principle 11: Conserve physical cultural resources	**Not Triggered.** Construction activities for upgrading TVET institutes will be carried out entirely within the existing premises of the TVET institutes. Field observations and consultations with the heads of the institutes confirmed that no designated physical cultural heritage sites are located within or in the vicinity of the institutional premises.	None
Involuntary Resettlement		
Principle 1: Project screening process.	**Triggered.** Due diligence, including safeguards risk screening, site visits, and consultations, confirms that the program is classified as Category C for IR.	None
Principles 2 to 12.	**Not Triggered.**	None
Indigenous People		
Principle 1: Project screening process.	**Triggered.** Due diligence, including safeguards risk screening, site visits, and consultations, confirms that the program is classified as Category C for IP.	None
Principles 2 to 9.	**Not Triggered.**	None

BIQ – Basic Information Questionnaire; CEA – Central Environment Authority; CSS – Country Safeguard System; EMP – Environmental Management Plan; EIA – Environmental Management Plan; IEE – Initial Environmental Examination; IP – Indigenous People; IR – Involuntary Resettlement; NEA – National Environment Act No 47 of 1980 including subsequent amendments and regulations; PAP- Program Action Plan; PIAL - Prohibited Investment Activities List; REA – Rapid Environment Assessment; SPS – ADB's Safeguard Policy Statement 2009.
Source: Asian Development Bank.

C. Diagnostic Assessment

1. Assessment Methodology and Resources

8. This assessment is based on (i) desk review of program documents, regulations of statutory authorities; (ii) field visits, including functional facilities of buildings, observing surrounding environment, topography and surface drainage, and status of partially constructed structures; and (iii) stakeholder consultations. Stakeholder consultations were conducted with officials of the Ministry, including the Additional Secretary, Chief Engineer, Directors, Heads of TVET institutions, staff, and students, to understand the existing environmental and social conditions, current safeguard practices, and institutional capacity for implementing the proposed program. The consultations were carried out during ADB's program review mission, with the participation of the ADB environmental and social safeguard officers, senior projects officer of ADB's resident mission and a safeguard-consultant. The consultations at the ministry level were conducted in English. During the field visits, both English and the national language, Sinhala, were used to ensure effective communication and enable the meaningful participation of stakeholders with limited English proficiency.

9. As part of the environmental due diligence, field visits were conducted to assess the environmental conditions and safeguard requirements of the College of Technology in Kurunegala, the Vocational Training Centre in Ballapana (Kegalle), the Technical College in Godagama (Homagama), the Training Centre for Students Requiring Special Care of the Vocational Training Authority in Colombo in July 2024, the Automobile Engineering Training Institute in Orugodawatta, the Technical College in Gampaha in January 2026, the Technical College in Polonnaruwa, and the Technical College in Trincomalee in April 2026.

2. Environment

10. **Policy and legal frameworks**: The environmental safeguard legal framework in Sri Lanka is well established, with clearly defined legislation, regulations, institutional arrangements, environmental clearance requirements, and implementation procedures designed to avoid, minimize, and mitigate adverse environmental impacts. The framework is principally governed by the National Environmental Act, No. 47 of 1980, as amended (NEA), together with the regulations issued thereunder, and the procedures and guidelines published by the Central Environment Authority (CEA), which serves as the country's principal environmental regulatory authority. Under the NEA, environmental risk and impact assessment requirements apply only to projects and activities classified as “prescribed projects/activities” under the applicable regulations, which are updated periodically through amendments as necessary. Projects that do not fall within these prescribed categories are not required to undergo an Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA). However, all projects and activities, including program subprojects, remain subject to the applicable legislation and regulations of Sri Lanka and are required to comply with all relevant legal requirements. This includes, among others, the pollution

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prevention and control requirements of the CEA;[3] labor laws[4] governing occupational health and safety, worker welfare, and grievance redress; and local authority regulations[5] relating to public health, sanitation, and solid waste management. Compliance with these legal and regulatory requirements is mandatory. Further, physical cultural resources are protected under the Antiquities Ordinance and the regulations of the Urban Development Authority.[6] Public access to information is provided through the Right to Information Act.[7]

11. Accordingly, the relevant provisions are incorporated into the program as a generic Environmental Management Plan (EMP) of the contract documents. Contractors are therefore required to prepare and implement a site-specific construction EMP to ensure compliance throughout the execution of civil works. The supervising staff are responsible for monitoring the effective implementation of the construction EMP, verifying compliance, requiring timely corrective actions where necessary, reviewing implementation progress as part of contract administration, and reporting the compliance status to the Ministry.

12. **Implementation practice**: As the program subprojects are confined to the existing premises of TVET institutions, which are not located within protected areas, environmentally sensitive areas, or sites of physical cultural heritage significance, and primarily involve the upgrading of existing buildings and associated infrastructure, they are not classified as "prescribed projects" under the national environmental assessment framework. Therefore, they do not require further environmental assessment under the EIA procedures. Nevertheless, compliance with the requirements stipulated in applicable government legislation and local authority regulations remains mandatory. Accordingly, the relevant provisions are incorporated into the program as a generic EMP of the contract documents. The successful bidder will therefore be contractually obligated to implement appropriate mitigation measures, including pollution prevention and control measures, and to ensure the health and safety of project workers, students, staff, and visitors throughout the construction period. Contractors are therefore required to prepare and implement a site-specific construction EMP to ensure compliance throughout the execution of civil works. The supervising staff are responsible for monitoring the effective implementation of the construction EMP, verifying compliance, requiring timely corrective actions where necessary, reviewing implementation progress as part of contract administration, and reporting the compliance status to the Ministry. Capacity-building programs will continue during the operational phase to strengthen awareness among TVET institute management, students, teaching staff, and other relevant stakeholders regarding the applicable regulatory framework and required environmental and social mitigation measures. The CEA, as the environmental regulatory authority, has deployed field officers nationwide to monitor compliance, verify

[3] National Environmental (Ambient Air Quality) Regulations, published under Gazette No. 1562/22 on 15.08.2008 and subsequent amendments; National Environmental (Stationary Sources Emissions Control) Regulations, published on 05.06.2019 under Gazette No. 2126/36; National Environmental (Noise Control) Regulations, sanctioned on 06.05.1996 under Gazette No. 924/12 and subsequent amendments; National Environmental (Protection and Quality) Regulations, No. 1 of 2008 and subsequent amendments for wastewater and effluent discharges into different inland and coastal environments; and National Environmental (Municipal Solid Waste) Regulations, No. 1 of 2009 published in Gazette No. 1627/19 of 10 Nov. 2009 set the regulations for Municipal Solid Waste.

[4] The Factories Ordinance, No. 45 of 1942, as amended (including Act No. 32 of 1984 and subsequent amendments), establishes the legal framework for occupational health and safety, requiring employers to provide workers with safe and healthy working conditions and to prevent occupational accidents, injuries, and diseases through appropriate workplace safety measures, welfare facilities, and safe work practices.

[5] Public Health Ordinance No. 3 of 1897, as amended, provides the legal framework for safeguarding public health by regulating sanitation, waste management, the prevention of public health nuisances, and the control of communicable diseases through the competent public health authorities.

[6] Antiquities Ordinance, No. 9 of 1940, as amended, and the Urban Development Authority Law, No. 41 of 1978, as amended.

[7] Right to Information Act, No. 12 of 2016.

adherence to environmental approval conditions, facilitate corrective actions where necessary, and report compliance status. In parallel, the project proponent remains responsible and accountable for ensuring that contractors implement the prescribed mitigation measures and for monitoring their effectiveness throughout the project lifecycle. As the subproject activities do not fall under the prescribed activities under national regulations, no further environmental assessment, including screening and classification under the national environmental assessment process, is required. Environmental screening and classification were undertaken using the REA checklist (Appendix 3).

13. Although the objective of the national environmental safeguard framework and the policy principles of ADB's SPS is to achieve environmental sustainability through the application of the mitigation hierarchy, there are procedural differences between the two approaches. A project classified as “non-prescribed” does not exempt it from complying with environmental and other statutory obligations. Regardless of the environmental assessment requirement, every project proponent, employer, contractor, consultant, and other responsible parties are required to comply with all applicable laws and regulations of Sri Lanka. These include, but are not limited to, legislation governing environmental pollution (air, water, land, and noise), waste management, occupational health and safety, community health and safety, labor grievance handling, public grievance management, and other applicable environmental and social requirements.

14. Statutory grievance redress mechanisms are available under the national legal framework. To strengthen grievance management during project implementation, the Standard Bidding Documents (SBDs) issued by the Construction Industry Development Authority (CIDA) require contractors to comply with a Code of Conduct that includes the establishment and operation of a grievance redress mechanism (GRM) for the Contractor's Personnel and/or the project-affected communities, as appropriate. The CIDA SBDs also facilitate the incorporation of an EMP into the contract documents to ensure effective implementation of environmental mitigation measures. Stakeholder consultation is an integral component of the project planning and feasibility assessment process under the national system and is expected to continue throughout project implementation. Physical cultural resources are protected through the relevant national laws and regulations. Under the ADB SPS, these environmental and social safeguard requirements are addressed through the applicable safeguard policy principles.

15. To ensure consistency with the objectives and requirements of the SPS, the Ministry has agreed to adopt the following program-specific safeguard arrangements: (i) incorporate a generic EMP (Appendix 4), addressing the safeguard requirements of the triggered SPS Policy Principles, into the contract documents, thereby making these requirements binding contractual obligations throughout program implementation; (ii) incorporate a program-level Grievance Redress Mechanism (GRM) into the contract documents (Appendix 5); and (iii) establish a system for periodic safeguard monitoring and public disclosure of safeguard information through the official web portals of the Ministry and ADB. Similar safeguard procedures have been successfully followed by the Ministry in previous RBL programs.

16. **Gaps**: Field visits to ongoing and completed construction sites, together with stakeholder consultations, revealed common deficiencies resulting from the lack of preventive maintenance since the commencement of the operational phase. These pre-existing deficiencies can be effectively addressed through regular maintenance undertaken throughout the operational phase. Potential adverse environmental impacts and risks include dust and noise pollution, construction-related disturbances, occupational health and safety risks, and inadequate construction waste management. As construction activities will be undertaken while educational programs continue, special attention should be given to minimizing construction-related nuisances and disturbances

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that may disrupt teaching and learning activities. Since contractors are contractually required to comply with applicable government regulations on pollution prevention and control, occupational health and safety, and public health and safety, and these requirements are incorporated into the contract documents, the identified potential adverse impacts will be addressed through the implementation of contractual obligations. Accordingly, no significant systemic gaps were identified; however, routine implementation issues may arise during the construction phase, as these can be effectively addressed through regular supervision, monitoring, and corrective actions by the supervisory responsible staff.

17. **Programmatic risk**. Table 1 highlights that the program triggers fully or partly nine (09) of ADB's eleven (11) environmental policy principles, i.e., 1, 2, 3, 4, 5, 6, 7, 9, and 10 and detailed elaboration is presented in Appendix 2. These principles are substantially aligned with the NEA regulatory framework. Absence of experienced and skilled environmental safeguard personnel within the Ministry weakens institutional planning and implementation arrangements for environmental safeguard management, thereby limiting the effective implementation of safeguard functions. Programmatic risks may arise due to inadequate consideration of environmental safeguard requirements during the planning, design, and procurement processes, thereby resulting in insufficient guidance and ineffective implementation of mitigation measures by contractors. To mitigate these risks, qualified environmental safeguard specialists should be engaged on a project basis until permanent safeguard staff are recruited and institutional capacity is strengthened. Therefore, the overall programmatic risk of the program is low.

18. **Institutional risk**. MOEHEVE has accumulated experience in managing ADB-financed RBL programs since 2014. In previous programs, environmental safeguard functions were managed by establishing a separate unit for the program, comprising a project-engaged environmental safeguard officer, the chief engineer, ministry engineer, among other officers. Although the Ministry has gained considerable experience in implementing similar programs, institutional knowledge and capacity for environmental safeguard management have not been retained. The ministry does not have dedicated environmental and social safeguard personnel within its permanent establishment and instead relies on project-specific safeguard specialists engaged for the duration of individual projects. Consequently, safeguard knowledge, institutional capacity, and good practices are not sustained or progressively strengthened over the long term. At present, environmental and social safeguard responsibilities are overseen by the Chief Engineer of the Ministry; however, capacity to effectively manage environmental safeguard requirements needs to be strengthened. The Ministry has established a Project Coordination Unit (PCU) to support program planning and implementation, while the recruitment of dedicated safeguard personnel is still in progress. Therefore, the institutional capacity to manage environmental safeguards remains limited. Institutional risks may arise due to inadequate consideration of environmental safeguard requirements during program implementation, monitoring, and reporting, potentially resulting in insufficient supervision, delayed identification of issues, and a lack of proactive mitigation measures. These gaps may increase the likelihood of complaints from TVET staff regarding construction-related nuisances. However, such issues can be effectively addressed through routine supervision, monitoring, and timely corrective actions. Therefore, the overall institutional risk of the program is low.

19. **Contextual risk**. Information obtained through stakeholder consultations and field observations confirmed that the existing premises of the TVET institutes are generally not located in areas highly susceptible to natural hazards, particularly flash floods and landslides, including those associated with climate change. Consequently, the program is not expected to be exposed to significant direct disaster-related risks, other than temporary disruptions to access roads and public transport services caused by adverse weather conditions, which may affect the mobility of

students, staff, and project workers, as well as the delivery of construction materials and equipment. Therefore, the overall contextual risk of the program is low.

3. Involuntary Resettlement

20. Due diligence confirmed that the program will not require land acquisition or result in IR impacts. Outputs 1 and 2 may involve the renovation, upgrading, and limited expansion of existing TVET facilities; however, involuntary resettlement impacts are not anticipated, as civil works will be confined to existing campuses. Outputs 3 and 4 focus on policy, institutional, governance, and systems reforms with no physical footprint and are therefore not expected to involve land acquisition, land-use restrictions, or physical, or economic displacement. Any subproject identified during screening as requiring land acquisition, physical or economic displacement, or affecting land users (category A or B for IR) will be excluded from the program and will not be considered for financing or included in the achievement of program results. Therefore, the program's institutional, programmatic, or contextual risks are considered low.

4. Indigenous people

21. In Sri Lanka, the Vedda community constitutes a very small population that self-identifies as a distinct social and cultural group; however, the Constitution does not recognize any group as IPs. With reference to foot note 2, 1,373 Veddas were recorded within a total population of 21.8 million. No Vedda communities are present within the program's area of influence, nor do they use the project sites for any purpose; therefore, the program is not expected to have any impact on Vedda communities. Since the program is categorized as Category C for IPs safeguards, the program's institutional, programmatic, and contextual risks are considered low.

D. Safeguard Program Actions

22. The PSSA concludes that the Government of Sri Lanka's environmental legislation and other relevant legal and policy frameworks, including labor laws, local government regulations, and construction guidelines, are generally aligned with the environmental safeguard policy principles (1–11) of the ADB Safeguard Policy Statement (SPS), with no significant gaps identified. The assessment also concludes that the program presents low programmatic, institutional, and contextual risks. However, the PSSA identified a few potential weaknesses in the implementation of environmental and social safeguards, especially during the construction phase. To address these issues the MOEHEVE agreed to (i) establish and environmental and safeguard unit within the PCU; (ii) include health and safety clauses and environmental management plans in the bidding documents and contracts; (iii) safeguards monitoring and reporting; and (iv) implement the grievance redress mechanism and communication, as measures address any safeguards issues during program implementation. Accordingly, the grievance redress mechanism established under previous programs will be continued under this program. ADB will conduct periodic compliance reviews. The MOEHEVE further agreed to submit semi-annual environmental and social safeguard monitoring reports to ADB. Upon ADB's clearance, these monitoring reports will be disclosed on the ADB website. The proposed organizational structure of the PCU including the staff at Environmental unit (Environmental and GESI unit) is presented in appendix 6. The Ministry will be responsible for maintaining the upgraded institutions after project completion. The routine maintenance program of each TVET facility will include measures to ensure the long-term sustainability of the project outcomes. Any unanticipated environmental or social safeguard impacts identified during program implementation will be promptly reported to ADB through the Quarterly Progress Reports. These issues will be addressed through the agreed actions presented in Table 2, to be implemented by the MOEHEVE

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in collaboration with the TVET institutions participating in the program.

Table 2: Corrective Action Plan

Environment and Social Safeguards Issue	Proposed action	Responsibility	Timing
Limited capacity of the MOEHEVE to coordinate and manage the ESS requirements of the program.	Establish the environmental and social safeguard cell within the PCU and fill the required safeguard positions.	MOEHEVE and MSD	2026
Weak compliance of civil and electromechanical work contractors with respect to ESS requirements.	Include environmental and social safeguard clauses and environmental management plans in the bidding documents, ensuring the contractors develop and implement site specific environmental management action plans.	PCU of the Ministry	2027, before initiating the tender process of for the program
Attending to public and workforce grievances.	Continue the GRM established under SSEP with continued consultations and information disclosure.	PCU-MOEHEVE	2027
Irregular monitoring and reporting of ESS progress	Regular monitoring of safeguards actions implementation and reporting on a semi-annual basis. Ensure effective coordination between the ESS Specialist and the Ministry's procurement unit through the PCU.	PCU-MOEHEVE	2027

ESS = Environmental and Social Safeguard; GRM = Grievance Redress Mechanism; PCU = Program Coordinating Unit; SSEP = Skills Sector Enhancement Program.
Source: ADB.

STAKEHOLDER CONSULTATIONS FOR THE SDSTP PROGRAM, SRI LANKA

A. Introduction

1. A consultation mission for the proposed Skills Development System Transformation Program (SDSTP) was conducted in July 2024 in Kurunegala, Kegalle, and Homagama; January 2026 in Orugodawatta and Gampaha; and April 2026 in Polonnaruwa and Trincomalee. The mission team comprised Rayhalda Susulan (Senior Social Safeguards Officer, ADB), Saranga Gajasinghe (Senior Safeguards Officer, ADB), and Palitha Bandara (Environment Consultant), representing the environmental and social safeguards team. Through the Results-Based Lending (RBL) modality (the program), the ADB is supporting the Government of Sri Lanka to strengthen the skills development and technical and vocational education and training (TVET) sector through the proposed Skills Development System Transformation Program (SDSTP). The Ministry of Education, Higher Education, and Vocational Education (MOEHEVE or the Ministry) serves as both the executing agency and implementing agency for the program. During the consultation missions, the team held discussions with the Additional Secretary, Directors, Chief Engineer, and other relevant officials of the Ministry, as well as heads of TVET institutions, faculty members, and students. The consultations at the ministry level were conducted in English. During the field visits, both English and the national language, Sinhala, were used to ensure effective communication and enable the meaningful participation of stakeholders with limited English proficiency.

2. Increasing the provision of employment-oriented and quality-assured TVET requires expanding access to high-quality, demand-driven skills training aligned with labor market needs is one of the program outcomes. Accordingly, civil construction works will be undertaken to upgrade selected public TVET institutes into regional training hubs to enhance practical training capacity. In addition, a national TVET Center of Excellence in the automotive sector will be established to pilot industry-aligned training models, advanced curricula, and quality assurance practices.

3. The mission discussions focused on institutional readiness, safeguard compliance, stakeholder engagement, Grievance Redress Mechanism, and the potential environmental and social implications associated with the upgrading of the proposed TVET institutes. The structural component of upgrading TVET institutes will generally involve the renovation, retrofitting, rehabilitation, or expansion of existing buildings and structures, together with improvements to the surrounding areas and associated facilities. The Automobile Engineering Training Institute at Orugodawatta will require the vertical expansion of an existing building, for which structural provisions were incorporated into the original design to accommodate future vertical expansion.

B. Details of the Consultation

Location and Date	Discussion
College of Technology, Kurunegala – 30 July 2024	• The following information was gathered through consultations with the head of the TVET institute, academic and non-academic staff, and students. • The College of Technology (CTK), Kurunegala was established in 1965 and is one of the oldest technical education institutions in Sri Lanka. The CTK offers

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Location and Date	Discussion
	technical and vocational training programs covering engineering, information technology, hospitality, and business-related disciplines. The courses are designed to provide students with competency-based technical knowledge, practical skills, and workplace-oriented training aligned with National Vocational Qualification framework (NVQF) standards. The CTK accommodates approximately 1,000–1,100 new students annually across its full-time and part-time technical and vocational training programs. The total student population is approximately 1,600, including students enrolled in different years of multi-year diploma and certificate programs. • The College of Technology is in an urbanized area with convenient access for students and staff. The site has a relatively flat topography and is enclosed by a boundary wall, providing a degree of separation from the surrounding community. The land is owned by the Government. No informal settlements, encroachments, or livelihood activities were observed within the institute premises. In addition, no Indigenous Peoples communities have been identified in the surrounding area. • The college comprises both older and newly constructed buildings. One building is currently under construction; however, the contractor has temporarily demobilized from the site. The site has not been adequately reinstated prior to demobilization. Unused construction materials, including aggregates, remain scattered within the area, creating a potential risk of waterlogging. In addition, access to the incomplete building remains open, posing potential safety risks to students and other users of the premises. • The existing premises provide sufficient space for contractors to organize and manage construction activities related to the upgrading of educational buildings and associated infrastructure. Except for naturally grown trees and fruit-bearing trees, the premises do not contain dense vegetation cover. Dust generation and increased noise levels during the construction phase are unavoidable. Renovation of existing buildings may cause disturbances to students and teachers, as construction activities will be undertaken while educational programs continue. • Since construction administration is undertaken by Ministry officers, the involvement of institutional staff in construction supervision and safety management is limited. Measures to ensure the safety of students and staff should be strengthened, and appropriate authority should be delegated to the head of the institute or a designated institutional officer to monitor and coordinate safety-related matters. Although a GRM has been established, its effectiveness in addressing concerns and grievances raised by students and staff during the construction stage has been limited. • Students engaged in practical training, including automobile technology programs, welding activities, electrical installation etc., have been provided with appropriate personal protective equipment (PPE) to ensure their safety during workshop-based activities. • The site is not exposed to significant disaster risks, such as flooding or landslides, except for potential temporary transport difficulties during periods of adverse wet weather. As the site has a relatively flat topography and sandy soil conditions, stormwater is expected to drain naturally, and any temporary water stagnation is unlikely to persist for an extended period.
District Vocational Training Centre (DVTC), Ballapana – 30 July 2024	• The following information was gathered through consultations with the head of the TVET institute, academic and non-academic staff, and students. • The District Vocational Training Centre (DVTC), Ballapana, provides competency-based vocational training in engineering trades, construction, ICT, hospitality, and service-sector occupations under the NVQF. The center offers multiple full-time and part-time certificate programs, with annual intake varying

Location and Date	Discussion
	according to available training facilities, instructor capacity, and labor market demand. • The DVTC, Ballapana is located slightly away from the urbanized area; however, it has convenient access through regular public transport services. The site has a gently sloping topography with relatively well-drained soil conditions. Except for naturally grown vegetation and fruit-bearing trees, no other significant or valuable trees were observed within the premises. The institute premises are separated from surrounding settlements, and the land is owned by the Government. No informal settlements, encroachments, or livelihood activities were observed within the institute premises. In addition, no Indigenous Peoples communities have been identified in the surrounding area. • The institute comprises both older and recently constructed buildings. Debris removed during previous maintenance activities has been placed on some flat concrete roofs, which may create potential health and safety risks due to water stagnation and mosquito breeding. Water leakage from roofs was observed in some buildings. Although adequate sanitation facilities are available, routine maintenance, including the replacement of damaged or deteriorated fittings and accessories, requires further improvement. • Common maintenance requirements observed across the institutes include the replacement of outdated electrical installations, improvements to roof drainage systems, and cleaning and minor repairs to wastewater discharge systems. Due to the soil conditions, temporary stormwater stagnation may occur following heavy rainfall. However, the gently sloping terrain supports natural drainage and reduces the likelihood of prolonged waterlogging. • The existing premises provide sufficient space for contractors to organize and manage construction activities related to the upgrading of educational buildings and associated infrastructure. Dust generation and increased noise levels during the construction phase are unavoidable. Renovation of existing buildings may cause disturbances to students and teachers, as construction activities will be undertaken while educational programs continue. • Although certain areas of Kegalle District are identified as landslide-prone, the institute premises are not located within a designated landslide hazard area. Potential impacts are limited mainly to temporary transportation difficulties during periods of adverse weather conditions, and no other significant disruptions associated with natural hazards have been identified. • Since construction administration is undertaken by Ministry officers, the involvement of institutional staff in construction supervision and safety management is limited. Measures to ensure the safety of students and staff should be strengthened, and appropriate authority should be delegated to the head of the institute or a designated institutional officer to monitor and coordinate safety-related matters. Although a GRM has been established, its effectiveness in addressing concerns and grievances raised by students and staff during the construction stage has been limited. • Students engaged in practical training, including, soldering activities, electrical installation etc., have been provided with appropriate personal protective equipment (PPE) to ensure their safety during workshop-based activities.
Technical College (TC), Godagama – 31 July 2024	• The following information was gathered through consultations with the head of the TVET institute, academic and non-academic staff, and students. • Technical College (TC), Godagama, Homagama in Colombo District accommodates students enrolled in full-time and part-time NVQF-based certificate and diploma programs. The annual intake varies depending on the number of courses offered and available training facilities. The institution provides practical workshop and laboratory-based training in engineering, construction, electrical, electronics, ICT, and other technical disciplines.

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	• The Technical College, Godagama is located within a semi-urbanized setting with convenient access to public transport and other essential services. The site has relatively flat terrain, sandy soil conditions, and adequate stormwater drainage arrangements. The TVET premises are enclosed by a boundary wall, providing physical separation from the surrounding residential and urban environment. The land is owned by the government. No informal settlements, encroachments, or livelihood activities were observed within the institute premises. In addition, no Indigenous Peoples communities have been identified in the surrounding area. • Common maintenance requirements observed across the institutes include replacement of frequently damaged sanitary facilities, improvement of outdated electrical installations, and cleaning and minor repairs to wastewater discharge systems. Although the well-drained soil conditions facilitate stormwater infiltration and reduce the likelihood of prolonged waterlogging, the relatively flat terrain may result in temporary surface water accumulation in localized areas following heavy rainfall. • The existing premises provide sufficient space for contractors to effectively organize and manage construction activities associated with the upgrading of educational buildings and associated infrastructure. Dust generation and increased noise levels are expected during the construction phase and will require appropriate mitigation measures. As renovation activities will be undertaken while educational programs continue, temporary disruptions to teaching and learning activities may occur. Adequate site safety arrangements, including controlled access, separation of construction areas, and protection of students, staff, and visitors, will be required throughout the construction period. • Since construction administration is undertaken by Ministry officers, the involvement of institutional staff in construction supervision and safety management is limited. Measures to ensure the safety of students and staff should be strengthened, and appropriate authority should be delegated to the head of the institute or a designated institutional officer to monitor and coordinate safety-related matters. Although a GRM has been established, its effectiveness in addressing concerns and grievances raised by students and staff during the construction stage has been limited. • Students engaged in practical training, including, automobile activities, electrical installation etc., have been provided with appropriate personal protective equipment (PPE) to ensure their safety during workshop-based activities.
Automobile Engineering Training Institute in Orugodawatta, Colombo – 27 Jan 2026	• The following information was gathered through consultations with the head of the TVET institute, academic and non-academic staff, and students. • Automobile Engineering Training Institute (AETI) is a specialized national-level training institute dedicated to automobile engineering and related trades. It functions under the National Apprentice and Industrial Training Authority (NAITA) and is administered under the MOEHEVE. The institute was established in 1989 with Japanese Government assistance to develop skilled manpower for the automobile sector. In 2017, the institute was relocated and upgraded with support from the Japan International Cooperation Agency (JICA) to enhance training facilities. • AETI admits students annually for full-time and part-time automobile engineering training programs. The annual intake varies according to available training facilities, instructor capacity, and industry demand. The institute provides practical workshop-based training supported by specialized divisions for automobile mechanics, automobile electrical systems, air-conditioning, machining, body repair, and vehicle painting. • The AETI is situated in a highly urbanized area within the Colombo Metropolitan Region, with good access to public transport and other essential services. The

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	institute premises are enclosed by boundary walls and fencing, providing physical separation from the surrounding urban environment. A drainage channel along the rear boundary provides adequate drainage for stormwater runoff from the premises during heavy rainfall events. The land is owned by the government. No informal settlements, encroachments, or livelihood activities were observed within the institute premises. In addition, no Indigenous Peoples communities have been identified in the surrounding area. • Regular preventive maintenance has been undertaken, and no significant maintenance deficiencies were observed during the assessment. • The proposed upgrading of AETI includes vertical expansion of the existing building. The original design incorporated structural provisions to accommodate future vertical extensions. The surrounding area within the premises provides sufficient space for contractors to safely organize and manage construction activities associated with the proposed expansion. • However, as construction activities will be undertaken while educational programs continue, special attention should be given to ensuring the safety of students and staff. Discussions revealed that separate access arrangements have been provided for students and staff during the construction period. The mission emphasized the importance of incorporating construction-related safety awareness into orientation programs for new intakes and existing students, as well as distributing leaflets highlighting required safety measures and conducting safety drills. • Since construction administration is undertaken by Ministry officers, the involvement of institutional staff in construction supervision and safety management is limited. Measures to ensure the safety of students and staff should be strengthened, and appropriate authority should be delegated to the head of the institute or a designated institutional officer to monitor and coordinate safety-related matters. Although a GRM has been established, its effectiveness in addressing concerns and grievances raised by students and staff during the construction stage has been limited. • Students engaged in practical training in automobile activities and related electro-mechanical activities have been provided with appropriate personal protective equipment (PPE) to ensure their safety during workshop-based activities.
Technical College in Gampaha 29 Jan 2026	• The following information was gathered through consultations with the head of the TVET institute, academic and non-academic staff, and students. • Technical College (TC), Gampaha is one of the oldest technical education institutions in the country located and in Colombo District. The college provides competency-based technical and vocational education and training (TVET) aligned with the NVQF, with a particular emphasis on engineering and technology disciplines. The TC, Gampaha provides full-time and part-time NVQF-based certificate, diploma, and higher diploma programs in engineering, electronics, telecommunication, construction, refrigeration and air conditioning, and related technical disciplines. The annual student intake varies according to the training capacity, available facilities, and industry demand. • The Technical College is located a few kilometers from the main city, with convenient access from the Colombo–Kandy Highway and good public transport connectivity. The site is situated on gently sloping terrain with well-drained soil conditions. The premises are characterized by naturally occurring vegetation and fruit-bearing trees. The sloping topography, together with the permeable soil conditions, facilitates effective stormwater drainage, and significant waterlogging is unlikely to occur during periods of heavy rainfall. • The institute premises are enclosed by boundary walls and fencing, providing physical separation from the surrounding urban environment. The land is owned

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	by the government. No informal settlements, encroachments, or livelihood activities were observed within the institute premises. In addition, no Indigenous Peoples communities have been identified in the surrounding area. • The institute comprises both older and recently constructed buildings. While adequate sanitation facilities are available, routine maintenance requires strengthening. Key other maintenance needs include, upgrading of outdated electrical installations and cleaning and minor repairs to wastewater discharge systems. • The existing premises provide sufficient space for contractors to effectively organize and manage construction activities associated with the upgrading of educational buildings and associated infrastructure. Dust generation and increased noise levels are expected during the construction phase and will require appropriate mitigation measures. As renovation activities will be undertaken while educational programs continue, temporary disruptions to teaching and learning activities may occur. Adequate site safety arrangements, including controlled access, separation of construction areas, and protection of students, staff, and visitors, will be required throughout the construction period. • Since construction administration is undertaken by Ministry officers, the involvement of institutional staff in construction supervision and safety management is limited. Measures to ensure the safety of students and staff should be strengthened, and appropriate authority should be delegated to the head of the institute or a designated institutional officer to monitor and coordinate safety-related matters. Although a GRM has been established, its effectiveness in addressing concerns and grievances raised by students and staff during the construction stage has been limited. • Students engaged in practical training, including, automobile activities, electrical installation etc., have been provided with appropriate personal protective equipment (PPE) to ensure their safety during workshop-based activities.
Polonnaruwa Technical College 21 April 2026	• The following information was gathered through consultations with the head of the TVET institute, academic and non-academic staff, and students • Technical College (TC), Polonnaruwa provides full-time and part-time NVQF-based certificate and diploma programs in engineering, construction, electrical and electronic technology, ICT, automobile engineering, refrigeration and air conditioning, plumbing, machining, and business-related disciplines. The college has an annual intake of approximately 380–400 students, with a total enrolment of about 450 students of which nearly 40% are female students. Training combines classroom instruction with practical workshop- and laboratory-based learning aligned with industry requirements. • The Technical College is located on relatively flat terrain, approximately 3 km from the main town of Polonnaruwa. The site is characterized by well-drained sandy soil, which promotes effective stormwater drainage and minimizes the likelihood of prolonged waterlogging. The surrounding environment contains naturally occurring vegetation and fruit-bearing trees. The institute premises are enclosed by a boundary wall, providing physical separation from the surrounding urban environment. The land is owned by the government. No informal settlements, encroachments, or livelihood activities were observed within the institute premises. In addition, no Indigenous Peoples communities have been identified in the surrounding area. • The Technical College comprises predominantly older buildings, many of which require urgent rehabilitation. Key maintenance and rehabilitation needs include repairs to damaged roofs, roof gutters, and downpipes; replacement or upgrading of deteriorated electrical systems and installations; improvements to the wastewater discharge system; and rehabilitation of sanitation facilities.

Location and Date	Discussion
	• The institute premises provide sufficient space for the contractor to organize and manage construction activities associated with the upgrading of TVET buildings and related infrastructure. Dust generation and increased noise levels are expected during the construction phase and will require appropriate mitigation measures. As renovation activities will be undertaken while educational programs continue, temporary disruptions to teaching and learning activities may occur. Adequate site safety measures, including controlled access, segregation of construction areas, and protection of students, staff, visitors, and project workers, should be maintained throughout the construction period. • Since construction administration is undertaken by Ministry officers, the involvement of institutional staff in construction supervision and safety management is limited. Measures to ensure the safety of students and staff should be strengthened, and appropriate authority should be delegated to the head of the institute or a designated institutional officer to monitor and coordinate safety-related matters. Although a GRM has been established, its effectiveness in addressing concerns and grievances raised by students and staff during the construction stage has been limited. • Students engaged in practical training in automobile activities and related electro-mechanical activities have been provided with appropriate personal protective equipment (PPE) to ensure their safety during workshop-based activities.
Technical Institute, Trincomalee- 21 April 2026	• The following information was gathered through consultations with the head of the TVET institute, academic and non-academic staff, and students • Technical College (TC), Trincomalee is not very large institute like others. The TC admits approximately 230–250 students annually to full-time and part-time certificate and diploma programs. Student enrolment varies depending on program availability, training facilities, and labor market demand. The college offers NVQF-based certificate and diploma programs in construction technology, ICT, engineering, electrical trades, plumbing, accounting, office management, and language studies. Serving the multilingual communities of the Eastern Province, the college delivers training in Tamil, Sinhala, and English. Practical workshop and laboratory training is integrated with classroom instruction to develop industry-ready technical and vocational skills. • The Technical College is located approximately 3–4 km from the main town of Trincomalee on gently sloping terrain, separated from the main urban settlements, thereby providing a relatively quiet environment for teaching and learning. The premises contain mature trees, and a small natural forest patch is located adjacent to the site. The sloping topography facilitates effective stormwater drainage, minimizing the likelihood of waterlogging during heavy rainfall events. The land is owned by the government. No informal settlements, encroachments, or livelihood activities were observed within the institute premises. In addition, no Indigenous Peoples communities have been identified in the surrounding area. • The institute comprises both older and recently constructed buildings, which are generally maintained in fair condition; however, continued routine maintenance is required. Although adequate sanitation facilities are available, maintenance practices, including timely replacement of damaged or deteriorated fittings and accessories, need further strengthening. Existing classrooms and workshop spaces used for practical training require expansion and improvement to ensure a safe and conducive learning environment. Replacement of outdated equipment is also required to enhance training quality and occupational safety. • The existing premises provide limited space along the hilly terrain for contractors to organize construction activities associated with the upgrading of educational buildings and related infrastructure. However, construction activities can be

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	managed through careful planning and efficient utilization of the available space. Nevertheless, construction activities may create temporary access constraints for students and staff. Therefore, separate and safe access arrangements should be planned and established prior to the commencement of construction works. Dust generation and increased noise levels are expected during the construction phase and will require appropriate mitigation measures. As renovation activities will be undertaken while educational programs continue, temporary disruptions to teaching and learning activities may occur. Adequate site safety measures, including controlled access, segregation of construction areas, and protection of students, staff, visitors, and project workers, should be maintained throughout the construction period. • Since construction administration is undertaken by Ministry officers, the involvement of institutional staff in construction supervision and safety management is limited. Measures to ensure the safety of students and staff should be strengthened, and appropriate authority should be delegated to the head of the institute or a designated institutional officer to monitor and coordinate safety-related matters. Although a GRM has been established, its effectiveness in addressing concerns and grievances raised by students and staff during the construction stage has been limited. • Students engaged in practical training in automobile activities and related electro-mechanical activities have been provided with appropriate personal protective equipment (PPE) to ensure their safety during workshop-based activities.

AETI = Automobile Engineering Training Institute, CTK = College of Technology, DVTC = District Vocational Training Centre, GRM = Grievance Redress Mechanism, ICT = Information and Communication Technology, JICA = Japan International Cooperation Agency, MOEHEVE = Ministry of Education, Higher Education and Vocational Education, NAITA = National Apprentice and Industrial Training Authority, NVQF = National Vocational Qualification Framework, PPE = Personal Protective Equipment, TC = Technical College, TVET = Technical and Vocational Education and Training. Source: ADB.

A COMPARISON OF ADB'S SPS (2009) WITH PROGRAM'S RELEVANT REGULATORY FRAMEWORKS

ADB SPS Policy Principle (SPS-PP env.)	Triggered by the RBL Program	Equivalence of GOSL Environmental Regulatory Framework		Gap and Gap Filling Measures
		Regulatory System	Current Practices	
1. Use a screening process for each proposed project, as early as possible, to determine the appropriate extent and type of environmental assessment so that adequate studies are undertaken to commensurate with the significance of potential environmental impacts and risks.	Yes	The legal framework for screening and categorizing is established under Act No. 56 of 1988, an amendment to the NEA. The Act requires all projects identified as "prescribed projects," which are subject to prior approval by the PAA appointed by CEA. Pursuant to the Act, Gazette Extraordinary No. 772/22 of 1993 and its subsequent amendments establish the institutional arrangements for appointing PAAs and specify the categories of prescribed projects requiring environmental assessment. The project proponent is required to submit a BIQ containing preliminary project information with project description, which enables the PAA to screen the project and determine whether an EIA, IEE, or no further environmental assessment is required. The BIQ incorporates regulatory requirements related to protected areas, environmentally sensitive areas, physical cultural resources, and other environmental considerations relevant to the screening process. Furthermore, the permissible limits for air emissions, noise, and wastewater and effluent discharges to inland water bodies and the marine environment are prescribed under separate regulations issued by the CEA.	As the program subprojects are confined to the existing premises of TVET institutes, which are not located within protected areas, coastal zones, environmentally sensitive areas, or physical cultural resources, and involve improvements to existing structures, they are not classified as "prescribed projects" under the national environmental screening process. Therefore, no further environmental assessment is required under the applicable national regulations.	The program aligns with SPS-PP env #1. CSS does not require further assessment to comply with SPS pp 1. Therefore, environmental screening and categorization were carried out using ADB's REA Checklist. In addition, it was verified that the proposed program activities do not fall within the activities listed in ADB's PIAL.
2. Conduct an environmental assessment for each	Yes	As the program activities are not classified as "prescribed projects" under the national environmental screening process and are	Although contractors are legally required to comply with the applicable	The program aligns with SPS-PP env #2.

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ADB SPS Policy Principle (SPS-PP env.)	Triggered by the RBL Program	Equivalence of GOSL Environmental Regulatory Framework		Gap and Gap Filling Measures
		Regulatory System	Current Practices	
proposed project to identify potential direct, indirect, cumulative, and induced impacts and risks to physical, biological, socio-economic and physical cultural resources in the context of the project's area of influence		not subject to further environmental assessment requirements, such as an IEE or EIA, under the national regulatory framework, significant direct, indirect, cumulative, or induced impacts and risks on physical, biological, socioeconomic, and physical cultural resources within the project's area of influence are not expected. Further, contractors are legally required to comply with the applicable government regulations, including pollution control requirements: National Environmental (Ambient Air Quality) Regulations, published under Gazette No. 1562/22 on 15.08.2008 and subsequent amendments; National Environmental (Stationary Sources Emissions Control) Regulations, published on 05.06.2019 under Gazette No. 2126/36; National Environmental (Noise Control) Regulations, sanctioned on 06.05.1996 under Gazette No. 924/12 and subsequent amendments; National Environmental (Protection and Quality) Regulations, No. 1 of 2008 and subsequent amendments for wastewater and effluent discharges into different inland and coastal environments; and National Environmental (Municipal Solid Waste) Regulations, No. 1 of 2009 published in Gazette No. 1627/19 of 10 Nov. 2009 set the regulations for Municipal Solid Waste)	government regulations, the relevant pollution control requirements are also incorporated into the contract documents to ensure their effective implementation	Since pollution control measures are incorporated into the contract documents, significant gaps are not expected. However, conducting capacity-building programs would provide additional benefits by strengthening the ability of project planners to appropriately incorporate these requirements during project planning stage.
3. Examine alternatives to the project's location, design, technology, and	Yes	Projects that are not classified as "prescribed projects" under the national regulatory framework and no further	Since the subproject activities are primarily focused on upgrading	The program aligns with SPS-PP env #3

ADB SPS Policy Principle (SPS-PP env.)	Triggered by the RBL Program	Equivalence of GOSL Environmental Regulatory Framework		Gap and Gap Filling Measures
		Regulatory System	Current Practices	
components and their potential environmental and social impacts and document the rationale for selecting the particular alternative proposed. Also consider the no project alternative.		environmental impact assessment is required. Further, since all upgrading activities are confined within the TVET premises, no alternative site selection is required. However, alternative methods are considered during the feasibility study.	educational buildings and will be undertaken while educational programs continue, relevant engineering codes of practice incorporating safety planning, green building principles, climate resilience, and resilience to natural disasters shall be applied during the design stages and thereby alternative design approaches will be evaluated to selected most feasible option.	Since alternative design approaches have been evaluated during the engineering design process and appropriately incorporated into the contract documents, significant gaps are not anticipated.
4. Avoid, and where avoidance is not possible, minimize, mitigate, and/or offset adverse impacts and enhance positive impacts by means of environmental planning and management. Prepare an EMP that includes the proposed mitigation measures, environmental monitoring and reporting requirements, related institutional or organizational arrangements, capacity development and training measures, implementation schedule,	Yes	Since the program subprojects are not classified as prescribed projects under the national regulatory framework, no further environmental impact assessment is required. However, any activity, including subproject activities, shall comply with applicable labor legislation governing occupational health and safety, local authority regulations relating to public health and safety, and permissible limits for air, water, and noise pollution prescribed under the regulations of the CEA.	A generic EMP (Appendix 4) containing occupational health and safety, public health and safety, and permissible limits for air, water, and noise pollution shall be prepared and incorporated into the contract documents to ensure compliance with applicable government regulations.	The program aligns with SPS-PP env #4 Although a generic (EMP) is incorporated into the contract documents, its effective implementation may be constrained by the absence of a qualified environmental safeguard specialist within the Ministry. This capacity gap will be addressed during the project period through the engagement of a qualified environmental safeguard specialist.

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ADB SPS Policy Principle (SPS-PP env.)	Triggered by the RBL Program	Equivalence of GOSL Environmental Regulatory Framework		Gap and Gap Filling Measures
		Regulatory System	Current Practices	
cost estimates, and performance indicators				
5. Carry out meaningful consultation with affected people and all other stakeholders. Continue consultations during project implementation and establish a grievance redress mechanism	Yes	Although the program subprojects are not classified as prescribed projects under the national regulatory framework and therefore do not require further environmental impact assessment, compliance with applicable government regulations remains mandatory. The Industrial Disputes Act, No. 43 of 1950, as amended, promotes sound industrial relations and provides mechanisms for resolving worker grievances and industrial dispute; CEA maintains a public complaint mechanism to address complaints relating to environmental pollution; the Public Health Ordinance, No. 3 of 1897, as amended, provides the legal framework for addressing public complaints relating to sanitation, waste management, the prevention of public health nuisances, and the control of communicable diseases through the competent public health authorities.	The legal processes established under government regulations are often lengthy and time-consuming. To facilitate the timely resolution of project-related concerns, previous RBL programs established a project-level GRM. A similar GRM will be established and implemented under this program.	The program aligns with SPS-PP env #5 Consultations during the field visits are summarized in Appendix 1 A two-tier, subproject-level GRM to facilitate the timely receipt, assessment, and resolution of environmental safeguard-related concerns under the current program, as described in Appendix 5.
6. Disclose a draft environmental assessment (including the EMP) in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders. Disclose	Yes	Although the program subprojects are not classified as prescribed projects under the national regulatory framework and therefore do not require further environmental impact assessment, compliance with applicable government regulations remains mandatory. As such, Section 7 of the Right to Information Act, No. 12 of 2016, requires every public authority to maintain its records in a duly catalogued and indexed manner,	All program related documents are uploaded into Ministry web portal in two local languages and in English.	The program aligns with SPS-PP env #6 Current program related documents are disclosed in ADB and Ministry web portal in three languages before commencement of civil works .

ADB SPS Policy Principle (SPS-PP env.)	Triggered by the RBL Program	Equivalence of GOSL Environmental Regulatory Framework		Gap and Gap Filling Measures
		Regulatory System	Current Practices	
the final environmental assessment, and its updates if any, to affected people and other stakeholders.		consistent with its operational requirements, to facilitate the effective exercise of the right to access to information provided under the Act		
7. Implement the EMP and monitor its effectiveness. Document monitoring results, including the development and implementation of corrective actions and disclose monitoring reports.		As prescribed in previous sections, EMP to address local regulations is incorporated into contractual document.	Before commencing any civil work, the successful contractor shall submit a site-specific construction EMP to the Engineer for approval. The Engineer shall oversee the contractor's implementation of the prescribed mitigation measures, verify compliance with the approved construction EMP, and ensure effective environmental monitoring and timely corrective actions throughout the project lifecycle.	The program aligns with SPS-PP env #7 The ministry should ensure that the periodic monitoring reports are submitted in time and disclose in the official web portal.
8. Do not implement project activities in areas of critical habitats. If a project is located within a legally protected area, implement additional programs to promote and enhance the conservation aims of the protected area. Use a precautionary approach to the use, development, and management of	No	The program subprojects are not classified as prescribed projects under the national regulatory framework and therefore do not require further environmental impact assessment.	No critical habitats, protected areas, or notified eco sensitive zones of protected areas are located within the premises of TVET institutes.	SPS-PP env #8 is not triggered, because there are no critical habitats or legally protected areas identified within or near the proposed program area.

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		Regulatory System	Current Practices	
renewable natural resources.				
9. Apply pollution prevention and control technologies and practices consistent with good international practices as reflected in internationally recognized standards such as the World Bank Group's Environmental, Health, and Safety Guidelines. Adopt cleaner production processes and good energy efficiency practices. Avoid pollution, or, when avoidance is not possible, minimize or control the intensity or load of pollutant emissions and discharges, including direct and indirect greenhouse gases emissions, waste generation, and release of hazardous materials from their production, transportation, handling, and storage. Avoid the use of hazardous materials. Purchase, use, and manage pesticides based on integrated pest management approaches	Yes	Although the program subprojects are not classified as prescribed projects under the national regulatory framework and therefore do not require further environmental impact assessment, compliance with applicable government regulations remains mandatory. National Environmental (Ambient Air Quality) Regulations, published under Gazette No. 1562/22 on 15.08.2008 and subsequent amendments; National Environmental (Stationary Sources Emissions Control) Regulations, published on 05.06.2019 under Gazette No. 2126/36; National Environmental (Noise Control) Regulations, sanctioned on 06.05.1996 under Gazette No. 924/12 and subsequent amendments; National Environmental (Protection and Quality) Regulations, No. 1 of 2008 and subsequent amendments for wastewater and effluent discharges into different inland and coastal environments; and National Environmental (Municipal Solid Waste) Regulations, No. 1 of 2009 published in Gazette No. 1627/19 of 10 Nov. 2009 set the regulations for Municipal Solid Waste)	A baseline survey of air quality, noise levels, and water quality shall be conducted prior to the commencement of any project involving activities that may cause significant environmental pollution. During project implementation, the same environmental parameters are monitored periodically to assess the impacts of project activities, verify the effectiveness of mitigation measures, and ensure compliance with the applicable environmental standards and approval conditions. These requirements are incorporated into the contract documents.	The program aligns with SPS-PP env #9 Sub project activities do not cause significant environmental pollution. However, since sub project activities are conducted while educational programs continue, adequate mitigation measures shall be taken to minimize noise and dust generation as stipulated in the EMP presented in Appendix 4

ADB SPS Policy Principle (SPS-PP env.)	Triggered by the RBL Program	Equivalence of GOSL Environmental Regulatory Framework		Gap and Gap Filling Measures
		Regulatory System	Current Practices	
and reduce reliance on synthetic chemical pesticides				
10. Provide workers with safe and healthy working conditions and prevent accidents, injuries, and disease. Establish preventive and emergency preparedness and response measures.	Yes	Although the program subprojects are not classified as prescribed projects under the national regulatory framework and therefore do not require further environmental impact assessment, compliance with applicable government regulations remains mandatory. The health and safety of workers and students and staff are governed by: The Factories Ordinance, No. 45 of 1942, as amended (including Act No. 32 of 1984 and subsequent amendments), establishes the legal framework for occupational health and safety, requiring employers to provide workers with safe and healthy working conditions and to prevent occupational accidents, injuries, and diseases through appropriate workplace safety measures, welfare facilities, and safe work practices. Complementing these requirements, the Public Health Ordinance, No. 3 of 1897, as amended, provides the legal framework for safeguarding public health by regulating sanitation, waste management, the prevention of public health nuisances, and the control of communicable diseases through the competent public health authorities	Occupational and public health and safety requirements are incorporated into the EMP, which forms an integral part of the bidding documents. Consequently, the successful contractor is contractually obligated to implement the prescribed health and safety measures to protect project workers, students, staff, visitors, and nearby communities throughout the construction period.	The program aligns with SPS-PP env #10 Since sub project activities are conducted while educational programs continue, adequate mitigation measures shall be taken for the safety of students and staff as stipulated in the EMP presented in Appendix 4.
11. Conserve physical, cultural resources and avoid destroying or damaging them by using	No	Antiquities Ordinance, No. 9 of 1940 (as amended by Act No. 2 of 1955, Act No. 22 of 1998, and subsequent amendments) provides the principal legal framework for	No physical cultural resources are located within the premises of	SPS-PP env #11 is not triggered, because there are no physical cultural resources located within or

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ADB SPS Policy Principle (SPS-PP env.)	Triggered by the RBL Program	Equivalence of GOSL Environmental Regulatory Framework		Gap and Gap Filling Measures
		Regulatory System	Current Practices	
field-based surveys that employ qualified and experienced experts during environmental assessment. Provide for the use of "chance find" procedures that include a pre-approved management and conservation approach for materials that may be discovered during project implementation		the identification, protection, conservation, and management of antiquities and archaeological heritage. The Urban Development Authority Law, No. 41 of 1978 (as amended) and relevant development regulations provides planning controls in designated development areas, including restrictions and approvals for development activities that may affect heritage-related locations	TVET institutes or nearby outside area.	near the proposed program area

BIQ = Basic Information Questionnaire; CEA = Central Environment Authority; CSS = Country Safeguard System; EIA = Environment Impact Assessment; EMP = Environment Management Plan; GOSL = Government of Sri Lanka; NEA = National Environmental Act No. 47 of 1980 with subsequent regulations and amendments; PAA = Project Approving Agency; PCU = Program Coordinating Unit; PIAL = Prohibited Investment Activity List; REA = Rapid Environmental Assessment; SPS = ADB's Safeguard Policy Principles 2009; SPS PP = SPS Policy Principle; TVET = Technical and Vocational Education Training.
Source: ADB.

Rapid Environmental Assessment (REA) Checklist

URBAN DEVELOPMENT

Instructions:

- This checklist is to be prepared to support the environmental classification of a project. It is to be attached to the environmental categorization form that is to be prepared and submitted to the Chief Compliance Officer of the Regional and Sustainable Development Department.
- This checklist is to be completed with the assistance of an Environment Specialist in a Regional Department.
- This checklist focuses on environmental issues and concerns. To ensure that social dimensions are adequately considered, refer also to ADB checklists and handbooks on (i) involuntary resettlement, (ii) indigenous peoples planning, (iii) poverty reduction, (iv) participation, and (v) gender and development.
- Answer the questions assuming the "without mitigation" case. The purpose is to identify potential impacts. Use the "remarks" section to discuss any anticipated mitigation measures.

Country/Project Title:

Sector Division:

SCREENING QUESTIONS	Yes	No	REMARKS
A. Project Siting Is the project area…			
▪ Densely populated?		☐	
▪ Heavy with development activities?	☐	☐	
▪ Adjacent to or within any environmentally sensitive areas?			
● Cultural heritage site	☐	☐	
● Protected Area	☐	☐	
● Wetland	☐	☐	
● Mangrove	☐	☐	
● Estuarine	☐	☐	
● Buffer zone of protected area	☐	☐	
● Special area for protecting biodiversity	☐	☐	
● Bay	☐	☐	
B. Potential Environmental Impacts Will the Project cause…			

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URBAN DEVELOPMENT, page 2

SCREENING QUESTIONS	Yes	No	REMARKS
▪ impacts on the sustainability of associated sanitation and solid waste disposal systems and their interactions with other urban services.	☐	☐	
▪ deterioration of environmental conditions due to rapid urban population growth, commercial and industrial activity, and increased waste generation to the point that both manmade and natural systems are overloaded and the capacities to manage these systems are overwhelmed?	☐	☐	
▪ degradation of land and ecosystems (e.g. loss of wetlands and wild lands, coastal zones, watersheds and forests)?	☐	☐	
▪ dislocation or involuntary resettlement of people	☐	☐	
▪ degradation of cultural property, and loss of cultural heritage and tourism revenues?	☐	☐	
▪ occupation of low-lying lands, floodplains and steep hillsides by squatters and low-income groups, and them exposure to increased health hazards and risks due to pollutive industries?	☐	☐	
▪ water resource problems (e.g. depletion/degradation of available water supply, deterioration for surface and ground water quality , and pollution of receiving waters?	☐	☐	
▪ air pollution due to urban emissions?	☐	☐	
▪ social conflicts between construction workers from other areas and local workers?	☐	☐	
▪ road blocking and temporary flooding due to land excavation during rainy season?	☐	☐	
▪ noise and dust from construction activities?	☐	☐	
▪ traffic disturbances due to construction material transport and wastes?	☐	☐	
▪ temporary silt runoff due to construction?	☐	☐	
▪ hazards to public health due to ambient, household and occupational pollution, thermal inversion, and smog formation?	☐	☐	
▪ water depletion and/or degradation?	☐	☐	
▪ overpaying of ground water, leading to land subsidence, lowered ground water table, and salinization?	☐	☐	
▪ contamination of surface and ground waters due to improper waste disposal?	☐	☐	
▪ pollution of receiving waters resulting in amenity losses, fisheries and marine resource depletion, and health problems?	☐	☐	

GENERIC ENVIRONMENTAL MANAGEMENT PLAN

	Issue	Environmental impact (s)	Mitigation measure (s)	Monitoring sources	Responsible party (ies)
1	Pre-construction phase (Investigation, planning, design, preparation of bidding documents and pre-bid meetings)				
A	Potential risk in environment pollution.	Carefully observe the locations of adjoining classrooms and staff working areas where there is potential impact from: (i) dust-generating activities (demolition, material dumping); and (ii) noise and vibration from drilling, cutting, fixing, and machine operation. Investigate the existing topography of the surrounding area and check whether washed water or polluted surface run off will drain into clear water bodies.	Include site clearing measures to protect students and staff from dust, noise and vibration if classrooms and working areas are exposed to such impacts. Plan for completing earth work before monsoon rains Include provisions for diverting surface drainage water out of the clear water bodies.	Evaluation of designs and plans Observation and reporting	MOEHEVE Design engineers Potential bidders to accommodate
B	Garbage disposal arrangements, prior to commence the work	Disposing construction waste and food waste within the premises of the institutes where students are moving, until remove from the sites will impact human health. Disposing construction waste and food waste on unauthorized areas outside the institutes will impact community health.	During the stage of investigation, suitable temporary dumping areas which are free from danger shall be demarcated. Permission from local authorities shall be obtained for dumping construction waste and garbage and reinstating them	Evaluation of designs and plans Observation and reporting	MOEHEVE Design engineers Local authorities

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	Issue	Environmental impact (s)	Mitigation measure (s)	Monitoring sources	Responsible party (ies)
C	Insufficient drainage facilities of existing TVET institutes and centers	Water stagnation due to inadequate drainage facilities will create breeding grounds for mosquitos.	Incorporate necessary drainage facilities into the proposed activities.	Necessary drainage facilities included	Design engineers Focal points of TVET institutes and centers
2	Construction phase (mobilization, site preparation, and construction in operation)				
A	Cutting down trees	There can be grown trees that pose a risk to building structures, foundations and associated facilities. The loss of trees may lead to: Greenery reduction disregarding the number of trees removed Reduced shading, and a decrease in the aesthetic value and greening of the area.	Remove all trees that pose a risk to building structures, foundations and associated facilities. For any trees removed, compensate by planting the same or suitable species of trees at 1: 3 ratios. Include landscaping measures to prevent soil erosion and maintain greenery, ensuring environmental and aesthetic value.	Trees are planted and maintained until they reach self-growing stage. Landscaping included to the design Progress reports	Design architects/engineers Focal points of TVET institutes and centers
B	workers welfare/sanitary	Inadequate sanitary will create airborne and vector-borne diseases, Stray dogs, cats, searching for food waste can carry zoonotic diseases like rabies and toxoplasmosis.	The minor civil work in the program does not require a large labor force. Provide temporary toilets with washing facilities for construction workers and adequate welfare facilities, such as safe drinking water, meal room, first aid, etc. Avoid disposing of food waste in open areas; use closable tall bins that prevent access by stray dogs and cats, and utilize public services for disposal	Implemented the proposed mitigation measured Monitored performance regularly Took corrective actions where necessary	Focal points of TVET institutes and centers Contractor

	Issue	Environmental impact (s)	Mitigation measure (s)	Monitoring sources	Responsible party (ies)
C	Demolition of structures, partitions, and facilities	Spoil material generated due to any demolition (e.g. for masonry work, concrete, iron work, and electrical work) would disturb the students and staff, block access, and may be a health risk due to dust and noise including surrounding community and workers.	Plan demolishing work as much as possible to complete during holidays of the study programs. Extend support by the focal points of the institutes and centers Provide noise barriers and dust screens as in the BOQ. Plan drilling work (walls) to avoid educational program times by coordinating with the designated focal point of the TVET institutions and centers Provide water sprinkling or similar arrangements to control dist. Display sign boards about health and safety Cover temporary dumping areas before disposal Arrange awareness programs for the students, staff, and workers. Arrange separate corridor for the students and staff to access the institutes and centers. Provide dust masks for the students and staff Provide PPEs to the workers Hold regular toolbox meetings Practice waste minimization practices such as reusing, recycling, repurposing, and composting.	Ensure that all proposed mitigation measures, as needed based on the situation, have been taken and implemented. Ensure that students, staff, and workers have been practicing the procedures. Take corrective actions where necessary. Received local authority approval for the disposal yards Reinstated disposal yards regularly	Focal points of TVET institutes and centers Contractor Staff and students of the TVET institutes and centers

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	Issue	Environmental impact (s)	Mitigation measure (s)	Monitoring sources	Responsible party (ies)
			Dispose the residual waste to the yards approved by the local authorities. Reinstate the disposal yards regularly		
D	Soil erosion	Lands cleared for improving infrastructure facilities alter the surface runoff pattern and increase soil erosion during the rainy season. These activities can cause polluting surface runoff, and form runnels along newly constructed embankments during the monsoon rains. Stormwater congestion on site can create inconveniences for ongoing activities of the TVET institutes and construction work.	Plan as much of the earthwork as possible during dry weather periods. This is often practically difficult to achieve. Provide soil conservation bunds by studying the surface runoff pattern, natural drainage paths, surrounding land cover and nearby water bodies. Plan for avoiding delays of soil back filling. Dispose waste soil material for reinstatement of garbage pits. Construct intercepting ditches and drains to prevent runoff entering construction sites, and divert runoff from sites to existing drainage; Stabilize all earthwork disturbance areas within two weeks after earthworks have ceased; Adequately compact slop and re-vegetate disturbed surface (turfing)	Implemented the proposed mitigation measured Monitored performance regularly Took corrective actions where necessary	Focal points of TVET institutes and centers Contractor
E	Air pollution	Air pollution due to dust generation affects health situation of atmosphere,	Deploy water sprinkling system or similar arrangement	Implemented the proposed mitigation measured	Focal points of TVET institutes and centers Contractor

	Issue	Environmental impact (s)	Mitigation measure (s)	Monitoring sources	Responsible party (ies)
		students, staff, workers, and community nearby. Emitting malodorous smell from the containers of food/kitchen waste will disturb educational programs and affect health of students, staff, and workers	Provide dust screens as stipulated in the contract documents Cover fine construction material stockpiles during wind blowing periods Provide closable containers for collecting food waste and kitchen waste until dispose. Provide dust masks to students, staff, and workers Do not allow transport of fine material unless the material load is tightly covered	Monitored performance regularly Took corrective actions where necessary	
F	Noise pollution	Increased noise can cause discomfort, nuisance, and lack of concentration, leading to a decrease in performance of students.	Provide noise barriers as stipulated in the contract documents Schedule drilling of the walls of existing buildings during off-hours at the TVET institutes and centers by coordinating with the designated focal points.	Implemented the proposed mitigation measured Monitored performance regularly Took corrective actions where necessary	Focal points of TVET institutes and centers Contractor
G	Water pollution and drainage	Disposal of chemical-based wash water deteriorates surface runoff and pollutes the quality of wash water draining into natural waterways. Removing polluted water from foundations, trenches, and pits, haphazardly can lead to it draining into	Provide silt traps and avoid draining of polluted water into nearby habitats, water bodies, or other sensitive areas Avoid diverting hazardous effluents to the nearby water ways.	Implemented the proposed mitigation measured Monitored performance regularly Took corrective actions where necessary	Focal points of TVET institutes and centers Contractor

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	Issue	Environmental impact (s)	Mitigation measure (s)	Monitoring sources	Responsible party (ies)
		nearby gardens, clear streams, and water bodies downstream			
H	Accident risk	Potential risks due to accidents such as: The movement of machinery and trucks inside the premises of institutes while students and staff move; Material pieces falling from building top, which may cause damage to students and staff on the ground Material pieces falling from uncovered trucks, which may cause damage to pedestrians on the roadsides and vehicles traveling behind	Employ experienced drivers and operators for trucks and heavy machinery. Avoid deploying trucks and heavy machinery with inexperienced drivers, operators, or helpers. Regularly attend to the running repairs of all types of construction vehicles, trucks, and heavy machinery. Ensure all material-transporting trucks are not overloaded and are securely covered. Provide safety nets while carrying out building repairs. Display warning boards close to vulnerable places. Conduct awareness programs for students, and staff of TVET institutes, and distribute safety leaflets among students and staff.	Implemented the proposed mitigation measured Monitored performance regularly Took corrective actions where necessary	Focal points of TVET institutes and centers Contractor
I	Occupational safety and health	Construction workers are exposed to occupational hazards due to: Inadequate personal protective equipment (PPE), Inadequate safety of temporary structures,	Conduct safety awareness programs for the workforce, students, and staff of the TVET institutes Provide adequate personal protective equipment (PPE) in the correct sizes and ensure all workers and visitors are properly equipped.	Implemented the proposed mitigation measured Monitored performance regularly Took corrective actions where necessary	Focal points of TVET institutes and centers Contractor

	Issue	Environmental impact (s)	Mitigation measure (s)	Monitoring sources	Responsible party (ies)
		Unsafe extensions/wiring harnesses from power sources, Damaged safety nets, waste scraps, unsafe power tools, etc. Careless handling of solvents, explosives, and acidic and alkaline material. The students and staff involved in ongoing TVET programs and visitors may also exposed to such hazards because of their movements	Display sign boards for safety and health Hold regular toolbox meetings with the workforce All temporary structures must be approved by the engineer. Ensure protective nets are installed where necessary and verify their quality. All electrical fittings, wiring, and tools must be approved and regularly supervised by a qualified electrician. Waste scraps should be collected regularly and stored in a secure location until disposal. Ensure all workers handling chemicals, solvents, and other hazardous materials are properly equipped with PPE, including masks, gloves, goggles, safety kits, helmets, and rubber boots. Ensure security of students to prevent any interaction between workers and students under all circumstances.		
J	Impact of waste generation	Waste streams will include: Inert construction wastes (such as waste from demolished structures, debris, asbestos, concrete, etc.),	Conduct awareness programs on waste segregation, focusing on reducing, reusing, recycling, repurposing, and proper disposal. To make this operational, provide adequate facilities.	Implemented the proposed mitigation measured Monitored performance regularly	Focal points of TVET institutes and centers Local authorities Public Health Inspectors Contractor

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	Issue	Environmental impact (s)	Mitigation measure (s)	Monitoring sources	Responsible party (ies)
		Municipal-type waste (such as food waste and other waste disposed by workers), Wastes from construction consumables (such as paper, plastic containers, polythene, wrappings), Small quantities of hazardous waste (such as fuel containers, oil filters, oily rags, etc.). Spilled or leaked lubricants from site storage and improperly disposed of used oils from vehicles can contaminate the soil.	Identify suitable locations for disposing of waste materials, with approval from local authorities, and regularly reinstate these disposal yards. Regularly inspect leaks of hazardous liquids, oils, and lubricants in storage areas, and implement preventive measures to avoid contamination. Promptly repair oil leaks in machinery and vehicles and maintain records of these repairs in logbooks. Strictly control camp waste and ensure workers handle it with adequate care	Took corrective actions where necessary	
3	Decommissioning phase				
A	Disposing waste and cleaning site	Leaving temporary sheds without proper demolition, along with unused materials and waste, can create adverse impacts during the operational phase	All temporary structures—including buildings, shelters, and latrines—that are no longer required are fully removed, Any temporary access arrangements will be removed, and any wasted or hardened concrete deposited on road surfaces will be cleared. Compacted sections of the roadway, as well as temporary humps or speed barriers installed during construction, will also be removed.	Implemented the proposed mitigation measured Monitored performance regularly Took corrective actions where necessary	Focal points of TVET institutes and centers Local authorities Public Health Inspectors Contractor

	Issue	Environmental impact (s)	Mitigation measure (s)	Monitoring sources	Responsible party (ies)
			Areas where materials were previously stockpiled will be cleaned, and any loose fine materials will be collected. If rain is expected, temporary barriers will be placed on the downhill side to prevent soil from washing away; Remove nails, strapping, and plastic off cuts that could puncture tires; All temporary facilities, bins, liners, pallets, and residues will be removed and disposed of through licensed carriers with receipts; Make waste segregation, focusing on reducing, reusing, recycling, repurposing, and proper disposal practice operational at the stage of decommissioning as well. Dispose residual to the approved disposal yard and reinstate it. All biodegradable and non-biodegradable waste, including construction waste that is no longer required, is removed;		

BOQ = Bill of Quantities; MOEHEVE = Ministry of Education, Higher Education and Vocational Education; PPE = Personal Protective Equipment; TVET = Technical and Vocational Education and Training.
Source: ADB.

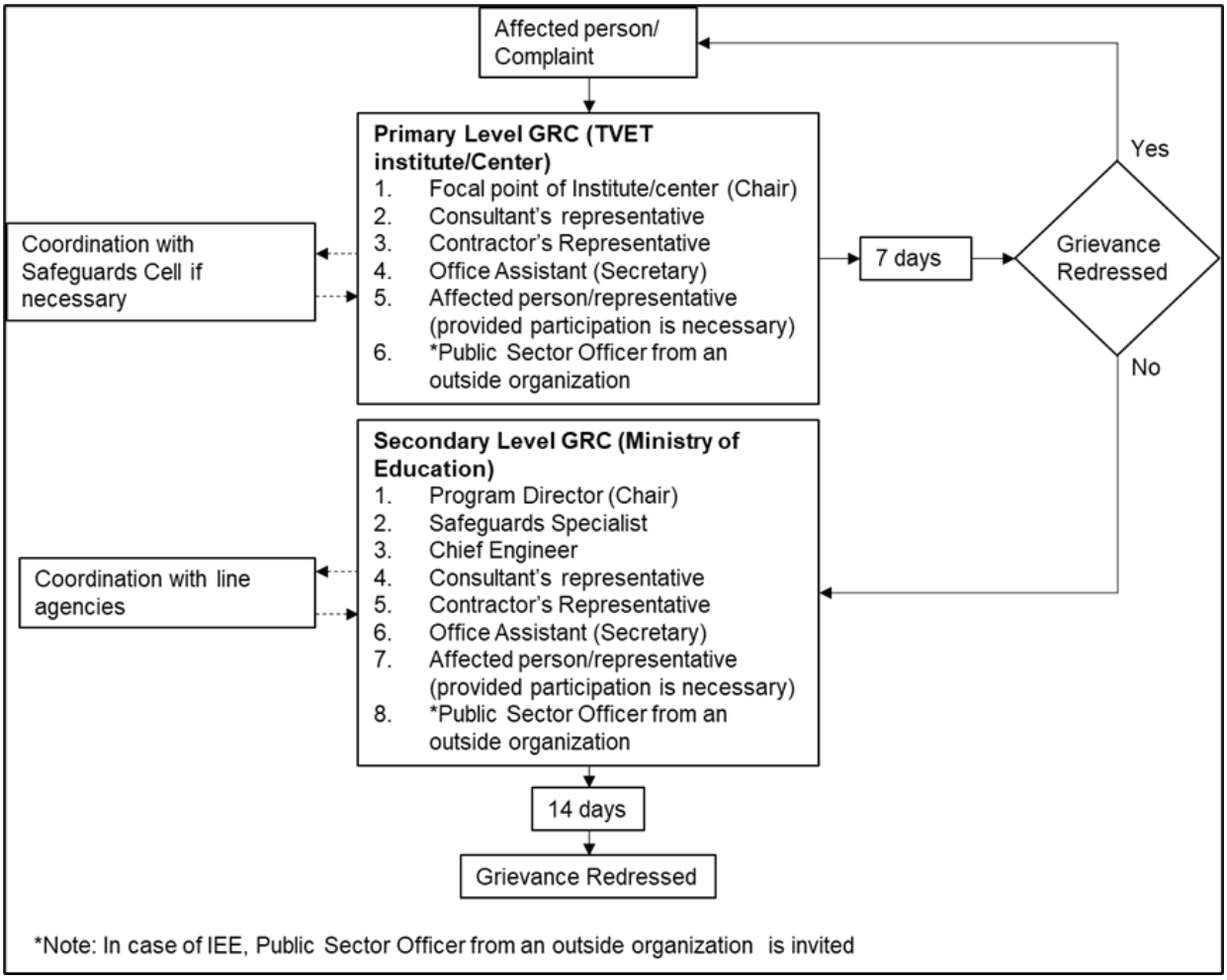
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Grievance Redress Mechanism

1. The program will adopt a Grievance Redress Mechanism (GRM) that is transparent, objective, and unbiased, addressing both environmental and social grievances. The previous Skills Sector Enhancement Program (Additional Financing) highlighted that complaints regarding environmentally adverse impacts were initially handled by project authorities. However, unresolvable complaints referred to the provincial or district officers of the CEA experienced significant delays in resolution. The regional officers of the CEA are responsible for addressing non-compliance related to Environmental Protection Licenses (EPL) and Scheduled Waste Management Licenses. As discussed during the fact-finding mission, all environment-related complaints will be primarily resolved at the sub-project level. Any unresolved complaints must be addressed by the PCU, with support from the environmental officer. These measures will be adopted by the MOEHEVE while executing the current program.

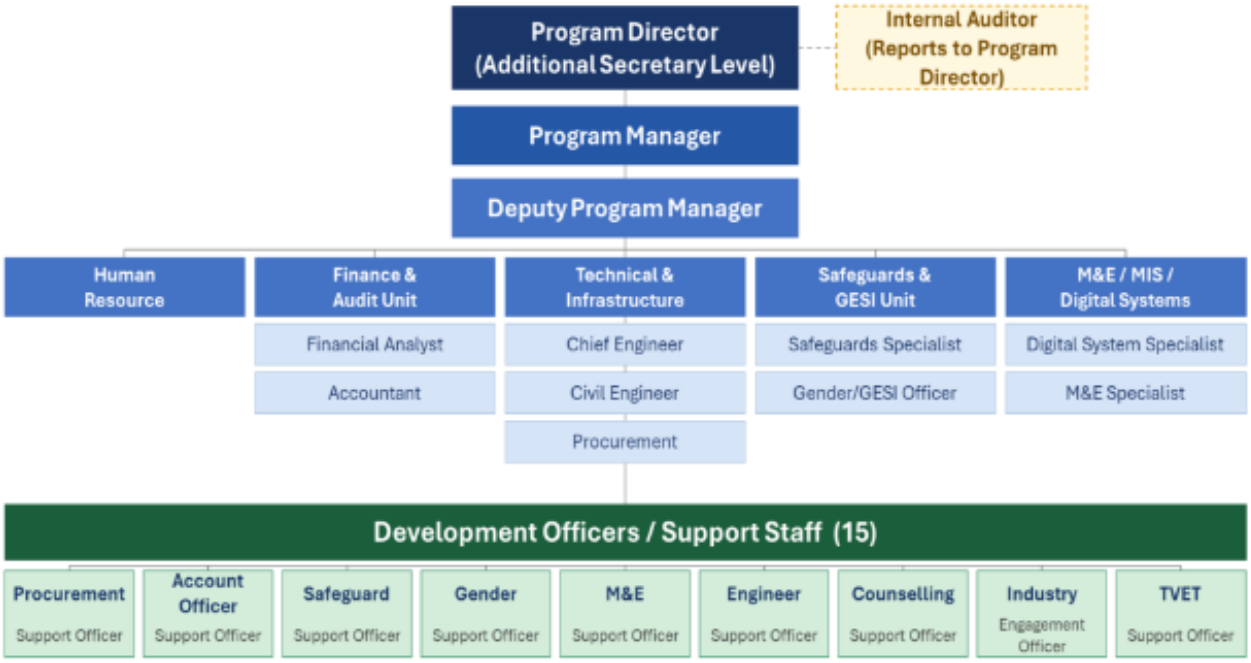
2. Each GRM established at the sub project level will be supported by the GRM established at the level of the MOEHEVE. Since the program involves civil construction works, a workable grievance redress committee will be formed, headed by the focal point of the TVET institute, with representation from the contractor's site manager and the environment officer. The MOEHEVE's Environmental Safeguards Officer will maintain close communication, employing mediation mechanisms as needed. However, any unresolved complaints will be addressed at the PCU level, allowing the Safeguards Officer to coordinate with other line agencies and the CEA if necessary. Informal and formal meetings will be conducted during project development and implementation, with minutes recorded. The environmental safeguards cell at the MOEHEVE will be responsible for managing the GRM. Schematic diagram of the GRM is presented below.

Figure a: Process of GRM and composition of GRC



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Program Coordination Unit (PCU) Organizational Chart



Source: MOEHEVE and ADB.