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Results-based Financing

Environmental and Social Systems Assessment

P00881 Uzbekistan: Expansion and Modernization of Public School Infrastructure, Phase 1 Project



Images on Cover Page

The top-left and bottom-left images show typical three-storey school buildings designed for 330 and 510 student places, with 11 and 17 classrooms, respectively. The top-right and bottom-right images show typical four-storey school buildings designed for 450 and 660 student places, with 15 and 22 classrooms, respectively.

Under Tranche 1, the RBP will construct 104 additional school buildings: 53 based on the 330-student model, 25 on the 450-student model, 6 on the 510-student model, and 20 on the 660-student model.

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Abbreviations

AIIB	Asian Infrastructure Investment Bank
AP	Action Plan
BILIM	Transforming Public Education for Economic Growth Program
BOQ	Bill of Quantities
CIDCA	China International Development Cooperation Agency
CP	Core Principle
DLI	Disbursement-Linked Indicator
DLR	Disbursement-Linked Result
EIA	Environmental Impact Assessment
ES	Environmental and Social
ESEL	Environmental and Social Exclusion List
ESMP	Environmental and Social Management Plan
ESSA	Environmental and Social Systems Assessment
GASN	State Architectural and Construction Supervision Inspectorate
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
ICT	Information and Communication Technology
IFI	International Financing Institution
IPF	Investment Project Financing
IsDB	Islamic Development Bank
LRU	Law of the Republic of Uzbekistan
MoCHCS	Ministry of Construction and Housing and Communal Services
MoEF	Ministry of Economy and Finance
MOES	Ministry of Education and Science
NCECC	National Committee on Ecology and Climate Change
OEM	Original Equipment Manufacturer
O&M	Operation and Maintenance
OHS	Occupational Health and Safety
PCO	Program Coordination Office
PPE	Personal Protective Equipment
PPM	Project-affected People's Mechanism
RA	Results Area
RBF	Results-based Financing
RBP	Results-based Project
SanPiN	Sanitary Rules and Norms
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEE	State Environmental Expertise
SHNK	Construction Norms and Rules
STEM	Science, Technology, Engineering and Mathematics
UCS	Unified Customer Service under Capital Construction Division of Regional Governments
WASH	Water, Sanitation and Hygiene
ZRU	Law of the Republic of Uzbekistan
ZVOS	Environmental Impact Assessment documentation

Executive Summary

This Environmental and Social Systems Assessment (ESSA) assesses the adequacy of the Government of Uzbekistan's environmental and social (ES) systems for managing the anticipated ES effects of the proposed Results-based Project (RBP), Expansion and Modernization of Public School Infrastructure, Phase 1 Project, in accordance with the Asian Infrastructure Investment Bank's (AIIB) Results-based Financing (RBF) Core Principles.

Project Context and RBP Scope

Project rationale. The proposed Project will support the Government of Uzbekistan's ongoing efforts to expand, modernize and improve the quality of public secondary education infrastructure. The Project responds to rapid demographic growth, urbanization and sustained pressure on existing school capacity. Although Uzbekistan has achieved near-universal participation in compulsory general secondary education, many schools operate in two shifts, instructional time is constrained, and learning environments vary significantly across regions and between urban and rural schools. Shortcomings in water, sanitation, and hygiene (WASH) facilities; accessibility for children with disabilities; science, technology, engineering and mathematics (STEM) and digital-learning infrastructure; and adequate classroom space affect the quality, inclusiveness, and safety of education services.

Project scope and location. The RBP supports a defined subset of the Government Program, focusing on eligible investments that directly contribute to results in school infrastructure, education quality, access and inclusion. The Project objective is to expand and modernize public school infrastructure, improve access to education, and enhance the quality of the learning environment to meet the increasing needs of secondary education across Uzbekistan. The RBP will be implemented through two tranches. Tranche 1 will support 104 confirmed existing general secondary schools across Bukhara, Kashkadarya, Khorazm, Samarkand and Surkhandarya regions and the Republic of Karakalpakstan during 2027–2029. These comprise 19 urban and 85 rural schools. Tranche 2 will support a further 112 schools during 2028–2030 in the same regions; the locations and profiles of these schools will be confirmed using the same eligibility and selection criteria applied to Tranche 1.

Capacity needs and expected benefits. The 104 confirmed Tranche 1 schools currently enroll 89,955 students against their current capacity of 53,222 places, indicating an aggregate capacity-utilization ratio of approximately 169 percent. The proposed additional buildings will provide 45,000 student seats, increasing the combined rated capacity of these schools to 98,222 places. This additional capacity is expected to reduce overcrowding, support more stable instructional hours, create conditions to reduce multiple-shift schooling, and enable participating schools to offer improved extracurricular, STEM, and digital-learning opportunities. The Project will also strengthen accessibility, gender-responsive WASH facilities, energy-efficient school design, and access to modern information and communication technology (ICT) facilities.

Results areas. The RBP is structured around three interrelated Results Areas. Results Area 1 supports the enabling environment for green and quality education, including energy-efficiency requirements for school infrastructure, extracurricular curriculum development and ICT classroom standards. Results Area 2 supports improved school infrastructure and capacity expansion through the phased completion of new, green and resilient school buildings and the creation of additional operational school seats and ICT classrooms. Results Area 3 supports access, equity and quality in education by reducing overcrowding and school capacity-utilization ratios, increasing the proportion of teachers completing certified training, and applying agreed inclusion and gender standards in targeted schools.

Physical works and model designs. The RBP will finance expansion within existing school compounds rather than construction of entirely new schools on new sites. Each participating school will receive one standardized additional teaching building, based on one of four model designs, with capacities of 330, 450, 510, or 660 students. The models include classrooms, teachers' rooms, STEM laboratories, libraries, separate toilets for girls and boys on each floor, accessible toilets, entrance ramps, elevators serving all floors, fire safety facilities, and rooftop solar panels. Associated works will include site preparation, foundations, superstructure, finishes, building services, local drainage, access works, and connections to available water-supply, sewerage, and electricity networks.

RBP boundary and exclusions. The RBP boundary and exclusion criteria are central to managing environmental and social (ES) risk. Eligible physical investments are limited to existing general secondary schools in the six priority regions, within verified school compounds and on land with confirmed government ownership or use rights. Activities requiring land acquisition, voluntary land donation, physical or economic displacement, restrictions on access, unresolved land disputes, significant conversion of natural habitats, impacts on protected areas or cultural heritage, large-scale demolition, or unmanageable hazardous-waste risks will be excluded. Category A and High ES risk activities, Category B activities with potentially significant adverse impacts, and activities prohibited under the AIIB Environmental and Social Exclusion List are also excluded.

Environmental and Social Benefits and Risks

Expected benefits. The expected ES effects of the RBP are predominantly positive. The Project will expand capacity in overcrowded schools, improve the quality and stability of school time, support safer and more inclusive learning environments, and strengthen institutional systems for delivering school infrastructure. Direct beneficiaries will include students, teachers, families and school communities. Students and teachers will benefit from less congested classrooms, improved WASH and accessibility arrangements, better STEM and digital-learning facilities, and safer, more resilient buildings. Families and communities are expected to benefit from more stable school schedules and increased access to improved education services.

Environmental risks. Potential adverse environmental impacts are assessed as Moderate. The main risks arise from construction within operating school compounds. These include site clearance, excavation, dust, noise, vibration, traffic and pedestrian safety, construction and hazardous waste, surface runoff, accidental spills, worker health and safety, tree removal, utility installation, fire and electrical safety, and operation and maintenance of new building systems. These impacts are expected to be site-specific, temporary, predictable and reversible. They can be managed through careful site planning, application of design standards, environmental assessment and approval, contract requirements, construction supervision, and operation and maintenance arrangements.

Social risks. Potential social impacts and risks are also assessed as Moderate. Construction at each school is expected to last approximately 8 months and involve a peak workforce of about 70 workers, most of whom will be recruited locally. Key social risks include disruption to school operations, temporary loss of school space, restricted access, child and community safety hazards, labour and working-condition risks, worker conduct and SEA/SH risks, temporary disturbance to neighbouring communities, and the possibility that girls, children with disabilities or other vulnerable groups may not fully benefit without consistent implementation and maintenance of inclusion measures. No land acquisition or displacement is anticipated because works will be confined to existing school compounds.

Legal, Institutional and Operational Performance

Legal and regulatory systems. Uzbekistan has a comprehensive legal and regulatory framework covering environmental assessment, construction permitting, waste management, labour and occupational health

and safety, child protection, gender equality, accessibility, grievance redress, cultural heritage, tree protection, energy efficiency and renewable energy. School construction is classified as Category III under the national environmental impact assessment (EIA) framework and requires EIA documentation (ZVOS) and a positive State Environmental Expertise (SEE) conclusion before construction begins. The Urban Planning Code and related construction, fire, seismic, accessibility and sanitary standards provide the basis for safe and functional school design. The principal issue is therefore consistent implementation and coordination, not the absence of applicable requirements.

Institutional responsibilities. Institutional responsibilities are distributed across the Ministry of Education and Science (MOES, established in October 2026 through the merger of the former Ministry of Preschool and School Education and the Ministry of Higher Education, Science and Innovation), regional MOES departments, regional Unified Customer Services (SCS or UCS), regional Ecology Committees, regional Labour Inspectorates, regional State Architectural and Construction Supervision Inspectorate (GASN), design consultant, and school administrations. MOES will report to AIIB. Regional UCKS will manage procurement, contract administration, daily technical supervision, construction quality, verification of completed works and handover. The Ecology Committee will review EIA documentation and issue SEE conclusions, while the Labour Inspectorate and GASN will provide regulatory oversight of labour, occupational health and safety (OHS) and construction compliance.

Institutional capacity. MOES has established a Project Coordination Office (PCO) and engaged an environmental consultant, while a multidisciplinary Design/EIA Consultant supports preparation. During implementation, the MOES will engage consulting services for project management support and construction supervision, including OHS supervision and ES monitoring, to further enhance the capacity of MOES regional branches and facilitate RBP implementation. However, MOES does not maintain permanent institutional ES capacity, and implementation requires a qualified social consultant and regional ES focal points. UCS has certified technical inspectors assigned across districts; however, their ability to provide comprehensive oversight may be affected by the number of construction sites under their supervision. The regional Ecology Committees and Labour Inspectorates have adequate capacity for approvals, targeted inspection and enforcement.

Operational Performance in Managing ES Effects

Performance of ES systems in the Project life cycle. Operational performance was assessed across the Project lifecycle to understand how existing environmental and social systems operate in practice. At the planning stage, the ESSA reviewed the model school designs, recent EIA documentation and SEE conclusions for sample schools. At the procurement stage, it reviewed the Government standard works contract and an international financing institution (IFI) funded school-construction contract to assess how ES requirements are incorporated into tendering and contracting. At the implementation stage, it reviewed the UCS construction-monitoring checklist and supervision practices. At the operation stage, the ESSA visited selected schools to assess the functionality, accessibility and maintenance of facilities after handover.

Review of model designs. The ESSA reviewed the model school designs to assess how ES considerations are incorporated into planning. The designs include entrance ramps, elevators for all floors (gender-separated) and accessible toilets on each floor, ventilation, fire and life safety, STEM laboratories, libraries, and renewable-energy systems. Their effectiveness will depend on site-specific adaptation, reliable utility connections, construction quality, commissioning and maintenance after handover.

Review of EIA documentation. The sample school EIA reviewed by the ESSA addresses environmental issues such as air quality, wastewater, waste, soil, flora and emergency risks. However, it does not

adequately assess labour, OHS, construction traffic, community and child safety, worker conduct, or SEA/SH, and it does not include details on stakeholder consultation.

Review of SEE conclusions. The corresponding SEE conclusion provides formal environmental approval and includes binding conditions on protecting utilities and sensitive areas, tree preservation, landscaping, waste management, dust control, topsoil conservation, and the installation of solar panels. These conditions provide a useful regulatory basis for construction-stage environmental management, but do not include monitoring and reporting requirements.

Review of contracts. The ESSA reviewed the Government standard works contract and an Islamic Development Bank (IsDB) financed school-construction contract to assess how ES requirements are incorporated into procurement and contract management. Standard Government contracts include general provisions on technical safety, working conditions, environmental protection, sanitation, waste removal, green space protection, site security, and technical supervision. However, they do not consistently require regular ES reporting, incident notification or corrective-action tracking. The IsDB-financed contract demonstrates stronger controls through designated ES personnel, worker Codes of Conduct, ES reporting, incident notification and remedies for non-compliance.

Review of construction supervision. The reviewed UCS monitoring record demonstrates an established and operational system for daily technical supervision. The UCS inspector uses a standard checklist and digital monitoring system to record construction progress, deficiencies, corrective instructions and verification of completed works for payment. However, the existing checklist focuses primarily on technical quality, quantities, progress, and expenditure. It does not systematically record compliance with SEE conditions or the broader ES impacts.

Review of operation-stage performance. The ESSA also reviewed the operational performance of existing schools during the site visits to sample schools. Schools generally have designated staff and budget arrangements for routine cleaning, maintenance of WASH facilities, and service providers are available for solid-waste collection and septic-tank servicing. The main operational concern identified was an unreliable water supply at some schools, which affected toilet cleanliness, handwashing, and overall hygiene conditions.

Stakeholder Engagement, Disclosure and Grievance Management

Consultations and disclosure: Stakeholder engagement during ESSA preparation included consultations with national institutions, regional and local agencies, school administrations, families, mahalla representatives, and communities from 13 to 28 July 2026 and on 24 August 2026. Consultations confirmed strong support for the proposed investments and for reducing overcrowding. Stakeholders also identified operational risks associated with construction in functioning schools, including access restrictions, construction-related hazards, dust, noise, and vehicle movements. The draft ESSA will be disclosed before appraisal, with summaries in Uzbek and consultations on the draft will inform the final ESSA.

Grievance Mechanism. The existing grievance system provides several channels, including the People's Reception system, MOES appeals arrangements, regional and local *khokimiyat* channels, and labour-related complaints to the Labour Inspectorate. These channels provide a well-established framework for receiving and resolving complaints. However, the ESSA identifies gaps in project-level tracking, child-accessible arrangements, confidential handling of sensitive complaints, protection against retaliation, and consolidation of grievances related to RBP-supported schools. The RBP will adapt existing systems by implementing project-level tagging, consolidated reporting, confidential handling protocols, and the disclosure of grievance channels, including AIIB's Project Affected Peoples Mechanism, at each participating school and mahalla.

Overall Assessment and Action Plan

Overall systems adequacy. The ESSA concludes that Uzbekistan's environmental and social legal, regulatory and institutional framework is generally adequate for managing the RBP's expected effects, provided that identified operational gaps are addressed through targeted system-strengthening measures. The overall ES risk is Moderate. The expected adverse impacts are manageable through careful application of eligibility criteria, site-specific EIA and SEE approval, standard ES Specifications, contractor oversight, worker and community safety controls, inclusive stakeholder engagement, strengthened grievance tracking and semi-annual ES monitoring. The Project's design also integrates ES considerations through disbursement-linked indicators (DLIs) related to energy efficiency, green and resilient buildings, operational school seats, and inclusion and equity.

Assessment against Core Principles. The ESSA finds that the applicable systems are broadly aligned with the AIIB RBF Core Principles, particularly in relation to environmental assessment and approval, construction safety, technical supervision, accessibility, grievance redress and avoidance of land acquisition or displacement. The assessment also identifies operational gaps in ES staffing, inclusive stakeholder engagement, project-level grievance tracking, confidential handling of sensitive complaints, contractor ES requirements, UCS inspector capacity and consolidated ES monitoring. These gaps are manageable and are addressed through the proposed Action Plan and DLI-linked measures.

Action Plan 1–8. Table 1 presents the recommended Action Plan (AP), which includes ten priority measures. Actions 1–4 strengthen the enabling systems for implementation by requiring ES staffing at national and regional levels, inclusive stakeholder engagement, project-level grievance tracking, and confidential reporting and referral pathways for sensitive complaints, including SEA/SH and other safeguarding concerns. Actions 5–8 address construction-stage implementation by requiring standard ES Specifications for school works, ES training for UCS inspectors, construction supervision and ES monitoring and semi-annual ES monitoring reports covering environmental, social and OHS performance, incidents, grievances, stakeholder engagement, training, non-compliance and corrective actions.

DLI-linked safeguards (AP 9–11). Actions 9–11 strengthen the ES implementation of DLI-linked results. Action Plan 9 will ensure that energy efficiency measures are implemented in RBP-supported schools. Action Plan 10 will ensure that Design/EIA completes ES screening for all RBP-supported schools as part of the EIA documentation. This screening will confirm eligibility, assess land legal status and current land use, including any informal use, identify site-specific ES risks, verify compliance with the RBP exclusion criteria, and support approval of the EIA/ZVOS and SEE documentation before works are tendered or commenced. Action Plan 11 will ensure that agreed inclusion and gender standards are applied and verified in targeted schools, including gender-segregated toilets, accessible routes and facilities for children with disabilities, and applicable inclusive learning materials.

Structure of the Main Document. The remainder of this ESSA is organized as follows. Chapter 1 introduces the Project context, objectives and assessment process. Chapter 2 defines the RBP scope, eligible activities, exclusion criteria and expected environmental and social effects. Chapter 3 assesses Uzbekistan's environmental and social management systems against AIIB's RBF Core Principles. Chapter 4 summarises stakeholder engagement, disclosure and grievance arrangements. Chapter 5 presents conclusions, recommended actions and implementation support arrangements. The annexes provide the screening matrix, legal framework, consultation records, detailed systems assessment and standard ES specifications.

Table 1: Proposed ES Actions and Measures

No.	Identified Gaps	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type
1	Limited dedicated ES staffing at MOES national and regional levels.	MOES shall (i) engage qualified environmental and social consultants in the Program Management Office and (ii) designate ES focal points in each participating regional office.	MOES/PCO and participating regional MOES offices	Within three months of RBP effectiveness and maintained throughout implementation	• The Terms of Reference for ES consultants and focal points have been approved. • The existing environmental consultant is formally assigned to implement RBP AP. • A qualified social consultant is engaged. • ES focal points are formally designated in all participating regional MOES offices. • The consultants and focal points remain in place throughout implementation.	AP
2	Stakeholder engagement during implementation does not consistently include women, persons with disabilities and other vulnerable groups.	Strengthen inclusive stakeholder engagement practices at the local level, with attention to women, persons with disabilities, and other vulnerable groups during planning and implementation.	MOES/PCO ES consultants and Regional Focal Points, in coordination with local authorities (khokimiyats) and the education department	Ongoing; first consultation and disclosure before works start at each school	• Planned works, schedule, expected disturbance and grievance channels are disclosed at the school and mahalla before work starts. • At least one consultation is held before work starts and one during implementation at covered schools. • Consultation and disclosure records show participation of women, persons with disabilities and other vulnerable groups.	AP
3	Project-related grievances received through existing government channels are not consolidated	Strengthen project-level tracking, consolidation, and reporting of grievances received through existing grievance mechanisms to	MOES/PCO ES consultants and regional Focal Points in coordination with	Ongoing; project tagging/register and reporting arrangements established within	• A project-specific grievance database or tagging system is established using existing grievance channels.	AP

No.	Identified Gaps	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type
	or reported at the Project level, making them difficult to identify and track.	ensure timely resolution and feedback.	relevant government authorities	three months of RBP effectiveness	• Grievances concerning RBP schools are extracted or reported from relevant government channels and entered into the project database. • Semi-annual consolidated reports present grievances received, resolved, outstanding and recurring issues.	
4	Existing grievance mechanisms do not provide a clear, confidential and anonymous reporting and referral process for SEA/SH and other sensitive complaints.	Formalize confidential reporting and referral pathways for sensitive complaints, including GBV/SEA/SH.	MOES/PCO, participating regional MOES offices, khokimiyats, school administrations and contractors	Within six months of RBP effectiveness and before works start at any occupied school	• A written protocol for confidential and survivor-centered handling of sensitive complaints is adopted and integrated into the project grievance arrangements. • Referral pathways to available health, psychosocial, legal and other support services are documented for all participating regions. • Relevant MOES, regional, school, and contractor personnel are informed of and trained in the protocol and referral process.	AP
5	School works contracts do not consistently include standalone ES specifications, contractors' ES staffing at site, or regular contractor ES reporting.	Apply standard ES Specifications for all AIIB-financed school works. The specifications shall be included in design documents intended for tendering. They shall require: (i) deployment of one qualified ES inspector	MOES/PCO with design institutes/consultants	Before the issue of the first RBP works tender and applied to all subsequent works packages	• The standard ES Specifications and the standard mitigation measures for school construction have been finalised and adopted by MOES. • The adopted ES Specifications are included in all RBP school designs and will be part of the tender documents. • Each contractor designates a qualified ES inspector for every active school site.	AP

No.	Identified Gaps	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type
		at each active school construction site, (ii) implementation of the standard mitigation measures, and (iii) monthly contractor ES reporting.			• Monthly contractor ES reports are submitted using the approved format.	
6	UCS inspectors may not be aware of all ES requirements applicable to the RBP.	Implement an ES training program for UCS inspectors in each participating region.	MOES/PCO ES consultants	Before or at the start of works in each participating region; refresher training every six months	• A common training presentation, handout and evaluation checklist are prepared. • A training schedule covering all six regions is approved. • At least one half-day training session is delivered to UCS inspectors in each participating region. • Attendance records and training materials are maintained.	AP
7	Limited capacity for consistent construction-stage ES and OHS supervision across multiple geographically dispersed school construction sites.	Engage construction supervision and ES monitoring consultants (CSC) under the IPF component, with professional ES/OHS capacity covering each participating region.	MOES/PCO	Before commencement of RBP-supported construction works and maintained throughout construction.	• Construction supervision and ES monitoring consultants engaged; • CSC contract includes environmental, health and safety, and social supervision requirements. • Qualified environmental, health and safety, and social specialists are deployed and maintained in each participating region before commencement of works. • Supervision findings, non-compliances and corrective actions are documented and reported through the Project's ES monitoring arrangements.	AP

No.	Identified Gaps	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type
8	MOES does not currently prepare any report on ES performance of ongoing school construction activities.	Prepare and submit semi-annual ES monitoring reports covering environmental, social and OHS performance of the RBP.	MOES/PCO ES consultants	Every six months	• A standard semi-annual ES monitoring report template is approved. • Reports cover all participating regions and active AIIB-financed school construction sites. • Reports summarise implementation of each applicable Action Plan item. • Reports include contractor performance, incidents, grievances, consultations, training, non-compliance, and corrective-action status. • Reports are submitted to AIIB within the agreed reporting period.	AP
9	Energy-efficiency and green-building requirements need to be consistently applied in school infrastructure design, approval and implementation	Apply the Energy Efficiency Decree and related implementation guidelines to all RBP-supported school infrastructure.	MOES in coordination with the Ministry of Construction	One-time DLI, in accordance with the agreed DLI schedule.	• The Decree is officially published, in force, and implementation guidelines applicable to school infrastructure are issued and circulated, as verified through official government documents and circulars.	DLI 1.1
10	ES screening and EIA documentation must be completed for all RBP-supported schools to confirm eligibility, identify site-specific risks and support informed decision-making under DLI 2.1.	Complete ES screening for all RBP-supported schools as part of the EIA documentation. The screening shall verify compliance with the RBP exclusion criteria; assess land legal status and current land use, including any informal use; identify	MOES/PMO, regional MOES departments with design institutes/ consultants	Phased throughout implementation in accordance with the DLI/DLR schedule	• Achievement is verified through applicable milestones, including approval of the detailed engineering design and ZVOS/EIA documentation; procurement and contract-award records; completion, handover, and commissioning certificates; and checklists confirming functional	DLI 2.1

No.	Identified Gaps	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type
		site-specific ES risks and mitigation measures; and support approval of the EIA/ZVOS documentation before works are tendered or commenced.			WASH, energy-efficiency, and solar-energy systems.	
11	Inclusive and equitable access to education facilities and services, particularly for girls and children with disabilities.	Ensure that the agreed percentage or number of targeted schools meets defined inclusion and gender standards.	MOES/PCO, regional MOES departments	In accordance with the annual targets and final DLI verification protocol	• The agreed percentage or number of targeted schools has functional gender-segregated toilets, accessible routes and facilities for children with disabilities, and applicable inclusive learning materials, as verified through facility audits, accessibility checklists and school documentation.	DLI 3.3

1 Overview

1.1 Background

Uzbekistan has achieved near-universal participation in school education. General secondary education covers Grades 1–11 and is compulsory. However, rapid growth in the school-age population and continued urbanization are placing increasing pressure on the public school system. In the 2024–2025 academic year, Uzbekistan had 10,943 general secondary schools. Available capacity has not kept pace with enrolment growth, affecting the quality, inclusiveness and safety of the learning environment. The main challenges in the education sector are summarized below.

- **Multiple shifts and insufficient instructional time**. About 65 percent of schools operate on two shifts due to insufficient capacity. Formal instruction is generally limited to less than five hours per day. Multiple-shift operation also restricts extracurricular activities.
- **Regional differences in the education environment**. Urban schools commonly have constrained sites and overcrowded classrooms, although they generally have better sanitation, digital infrastructure and modern learning facilities. Rural schools often have more land but older buildings and weaker sanitation, digital and educational infrastructure. Access to laboratories and equipment needed to deliver science, technology, engineering and mathematics (STEM) education also varies considerably between schools and regions.
- **Education quality**. Uzbekistan ranked 70th among 80 participating economies in the 2022 Programme for International Student Assessment. The Government aims to improve the country's ranking to 30th by 2030. Achieving this target will require better teaching practices, qualified teachers, improved learning facilities and expanded access to modern science, technology and foreign-language education.
- **Inclusive education**. Further measures are required to ensure equitable access for girls, children with disabilities and students from poor, rural and remote communities. The female-to-male ratio in general secondary education is 95:100, compared with 99:100 in the overall population. Girls may face greater barriers to continuing education in Grades 10 and 11. Many existing schools also lack accessible entrances, toilets and other facilities needed by children with disabilities.
- **Water, sanitation and hygiene (WASH) facilities**. According to 2023 estimates from the World Health Organization and United Nations Children's Fund Joint Monitoring Programme on WASH facilities in Uzbekistan, 70 percent of schools nationally have basic drinking-water services, with coverage reaching 80 percent in urban schools but only 49 percent in rural schools. Basic sanitation is available in 80 percent of schools nationally, including 86 percent of urban schools and 62 percent of rural schools. These disparities affect student health, dignity and attendance, particularly for girls and children with disabilities.

The Government is addressing these challenges through the Uzbekistan 2030 Strategy, the National Program for the Development of School Education in 2022-2026, and the annual state investment program. These initiatives support improvements in education quality, teacher capacity, inclusive education, digitalization and school infrastructure. They also seek to reduce overcrowding and multiple-shift operation through the construction, reconstruction, expansion, modernisation and equipping of schools.

Asian Infrastructure Investment Bank (AIIB) proposes to support a defined portion of the Government Program through Results-based Financing (RBF) under the Uzbekistan Expansion and Modernization of Public School Infrastructure Project, Phase 1. The Results-based Project (RBP) aims to expand and modernize public school infrastructure, improve access to education, and enhance the quality of the learning environment to meet the growing needs of secondary education across Uzbekistan. It will support expansion at 216 existing secondary schools across six regions.

1.2 Objectives of the Environmental and Social Systems Assessment

AIIB has prepared this Environmental and Social Systems Assessment (ESSA) in accordance with Section 15 of its Environmental and Social Policy. The ESSA assesses the environmental and social (ES) systems proposed to govern the RBP. It determines whether these systems can manage the expected ES effects in a manner consistent with the applicable RBF Core Principles.

The overall objectives of the ESSA are to (i) promote environmental and social sustainability in the design of the RBP; (ii) avoid, minimize or mitigate adverse environmental and social impacts; (iii) promote informed decision-making relating to the environmental and social effects of the RBP; and (iv) help the Client strengthen its environmental and social systems, where needed, and develop adequate capacity to manage the RBP's environmental and social risks and impacts.

1.3 ESSA Process

The main steps followed in preparing this ESSA are summarised below:

- **Review of the Government Program and screening of activities:** The overall Government Program has been reviewed to identify and screen potential ES risks. Category A activities, High ES risk activities, and Category B activities with the potential for significant adverse impacts were excluded. The screening results are presented in **Annex 1**.
- **Review of the applicable legal and regulatory framework:** The relevant national laws, regulations, standards and administrative procedures applicable to the RBP have been reviewed. The framework was assessed against the RBF Core Principles. **Annex 2** summarises the applicable requirements.
- **Assessment of institutional capacity:** This includes a review of the mandates, responsibilities, staffing, technical capacity, resources and coordination arrangements of the institutions responsible for managing the ES effects of the RBP.
- **Assessment of operational performance:** This included evaluating how the applicable requirements are implemented throughout the school infrastructure lifecycle. The team reviewed sample school designs, EIA documents (ZVOS), State Environmental Expertise (SEE) approvals (for the EIA), contract documents, and construction-monitoring checklists. This review identified gaps between formal requirements and their implementation in practice.
- **Review of the World Bank-supported BILIM Program:** The World Bank-supported Transforming Public Education for Economic Growth Program (referred to as BILIM) is a Program-for-Results operation that supports improvements in teaching quality, learning-conducive school environments, education system management, and data use. The team reviewed the technical and ES assessments and the program's findings.
- **Stakeholder consultations and site visits:** The team met with relevant national and regional agencies, school administrators, community representatives and students' families from July 13 to 24, 2026. The team also visited a representative sample of schools proposed for expansion. Details of consultation events and stakeholder engagement are given in **Annex 3**.

2 RBP Description

2.1 An Overview of Government Program

2.1.1 National Program and Objectives

The principal framework for school-sector development is the National Program for the Development of School Education in 2022–2026 (National Program). It was approved by Presidential Decree No. UP-134 dated May 11, 2022. The former Ministry of Preschool and School Education (now MOES) developed the National Program in coordination with other relevant government authorities. It supports the education priorities established under the Uzbekistan 2030 Strategy.

The National Program identifies the following priorities:

- Modernize curricula, teaching practices, and school facilities in line with advanced international practices.
- Strengthen teacher qualifications, professional development and incentives.
- Expand inclusive education and improve learning conditions for students with different educational needs.
- Expand digital management systems and the use of ICT in teaching and school administration.
- Reduce multiple-shift schooling through the construction, reconstruction, expansion, capital repair and equipping of schools based on modern designs.

The overall Government Program aims to improve the accessibility, quality, inclusiveness and relevance of preschool and school education. It covers improvements in curricula and teaching quality, training of teachers and school administrators, digital and ICT-enabled education, inclusive education, support for gifted students, and improvements to the capacity, condition, safety and accessibility of education facilities.

2.1.2 Government Program Activities

The Government Program is implemented through the State Budget, annual and multi-year State Investment Programs, and other education-sector arrangements. Since 2017, the Government has prepared annual State Investment Programs covering public secondary schools, preschools, and creative and subject-specialized schools.

Public expenditure for preschool and school education comprises salaries and training-related expenditure, taxes and statutory payments, capital investment, and operation and maintenance. For the purpose of defining and screening the RBP boundary, Government Program activities are grouped as follows:

- **Salaries and education-service expenditure**. This area covers regular salaries for teachers, school administrators and other education personnel. It also includes teacher and school-administrator training, professional development, curriculum development and implementation, and related teaching and training expenditure.
- **Preschool education capital investment**. This area covers facilities for children below school age. Activities include the construction of new preschools, reconstruction and expansion of existing facilities, capital renovation, major repairs, equipment, and associated design and investigation work.
- **General secondary-school capital investment**. This area covers public schools providing education in Grades 1–11. These investments cover:
    - **Construction of entirely new schools**: Establishing new general secondary schools and providing the associated land development, utilities, access, equipment and facilities.

  - **Reconstruction, including expansion**: Reconstruction and modernization of existing schools and construction of additional teaching blocks. It also includes associated utilities, access, equipment and facilities.
  - **Capital renovation and major repairs**: Replacement of roofs, windows, and doors; painting; repairs to building services; and other major works needed to extend the useful life of existing school buildings.
- **Green, energy-efficient and WASH infrastructure.** This area includes energy-efficient materials, insulation, efficient heating, lighting and ventilation, rooftop solar photovoltaic and solar water-heating systems, drinking-water supply, sanitation, wastewater management and accessibility improvements. It also includes measures to improve school safety, environmental sustainability and climate resilience.
- **Creative and subject-specialized schools for gifted students.** This area includes new construction, reconstruction, expansion, capital renovation, major repairs and equipment for selective schools serving academically or creatively gifted students.

2.1.3 Proposed Activities under RBP

The RBP will cover the following selected activities from the broader government program:

- Expansion of selected existing general secondary schools by constructing additional buildings within existing school compounds.
- Professional training for teachers and school administrators.
- Technology-enabled classrooms, student performance measurement systems, and modern curriculum development.

The State Investment Program is prepared and approved annually as part of the Government's budget preparation and review process. Based on previous and current State Investment Programs, total investment in general secondary education is estimated at USD 1.39 billion during 2025–2028. AIIB proposes to provide a sovereign-backed loan of USD 200 million and mobilise a USD 3.5 million grant from the China International Development Cooperation Agency (CIDCA). **Table 2.1** presents the indicative financing plan for the RBP.

The RBP will be implemented through two sequential and partly overlapping tranches, each financed through a separate AIIB loan agreement of USD 100 million. Tranche 1 will support the expansion of 104 existing general secondary schools and will be implemented from 2027 to 2029. Tranche 2 will support a further 112 schools and will be implemented from 2028 to 2030. The specific schools under Tranche 2 have not yet been finalized and will be selected using the same eligibility, prioritization, land-readiness and ES exclusion criteria applied to Tranche 1. Together, the two tranches will support 216 schools under Phase 1 of the Project.

Table 2.1: Proposed RBP Specific Expenditure and Financing Plan

(USD Million)

No.	Component	AIIB Loan		CIDCA Grant	Government Counterpart Financing*	Total
RBF Component		**Tranche-1 2027–2029**	**Tranche-2 2028–2030**	**2027–2029**		
1	**Expansion and Modernization of Public Schools**					
1.1	Construction of new school buildings in overcrowded schools	71.10	70.59		17.00	158.69
1.2	Educational equipment, classroom facilities, modern STEM lab, AI classrooms, and ICT classrooms	22.46	23.45	3.00	5.87	54.78
2	Contingency**	2.00	2.00		0.48	4.48
Subtotal - RBF Component		**95.56**	**96.04**	**3.00**	**23.35**	**217.95**
		191.60				
IPF Component						
3	Professional Development for Teaching and Administrative Staff	-	-	0.50	0.06	0.56
4	Project Management Support	1.34	0.86		0.26	2.46
5	Independent Verification Agent (IVA) consulting costs	1.00	1.00		0.24	2.24
6	Construction Supervision Cost (including OHS and ES supervision and monitoring services)	2.00	2.00		0.48	4.48
7	Financial Audit Services	0.10	0.10		0.02	0.22
Subtotal - IPF Component		**4.44**	**3.96**	**0.50**	**1.07**	**9.97**
		8.40				
Total		**100.00**	**100.00**	**3.50**	**24.42**	**227.92**
Percentage of Total (%)		43.9%	43.9%	1.5%	10.7%	100.0%

AI = artificial intelligence, ES= environmental and social, IPF = Infrastructure Project Financing, OHS = occupational health and safety.

Note: The specific expenditure and cost estimate are subject to change during the domestic review and approval procedures.

* Government counterpart financing includes the state budget allocated to cover the tax, social services fees, and registration fees for the review and approval of the detailed engineering design, EIA, and other permits for the construction of project schools. It is estimated as 12% of AIIB Financing and CIDCA grant.

** Contingency may be used for (1) consulting services for the preparation of detailed engineering design, EIA, and topographic and geotechnical surveys; (2) construction of new school buildings; and (3) educational equipment, classroom facilities, modern STEM lab, AI classrooms and ICT classrooms.

2.2 Defining RBP Scope

2.2.1 RBP Description

The RBP is structured around three interrelated Results Areas (RAs). Together, they support improvements in school infrastructure, education quality, access and inclusion.

- **Results Area 1: Enabling Environment for Green and Quality Education.** RA 1 establishes the policy, regulatory, curricular, and institutional conditions required for the sustainable delivery of resilient green school infrastructure and improvements in teaching and learning. It supports the implementation of energy-efficiency requirements for school infrastructure, the development and approval of an extracurricular curriculum and AI classroom textbooks, the integration of ICT classroom requirements into MOES standards, and the deployment of a standardized teacher-training and training-of-trainers package. These measures will enable the rollout of energy-efficient, ICT-enabled schools and sustain improvements in teacher capacity and instructional quality.
- **Results Area 2: Improved School Infrastructure and Capacity Expansion.** RA 2 supports the expansion and modernization of public-school infrastructure to meet growing demand and improve learning conditions. It will support the phased completion of new, green, and resilient school buildings for overcrowded schools that the government has prioritized for AIIB loan financing; the creation of additional operational school seats in state budget-financed and/or AIIB-financed schools; and the construction or renovation of ICT classrooms through the CIDCA grant. New school buildings will incorporate renewable energy solutions such as solar photovoltaic (PV) panels, energy-efficient measures such as centralized heating and cooling systems (fan coil), thermal insulation materials, efficient lighting systems and other climate-resilient solutions. Gender-separated WASH facilities will be included in the new school buildings, including appropriate on-site wastewater treatment for rural schools and connections to centralized sewage systems for urban schools.
- **Results Area 3: Access, Equity and Quality in Education**. RA 3 addresses persistent gaps in access, equity, and learning quality. Despite the near-universal access with enrollment and graduation rates of around 94%, students remain underserved. RA 3 supports the reduction of overcrowding by lowering the student enrollment coefficient in targeted Project schools; the completion of certified teacher training; and the achievement of agreed inclusivity and equity standards, including gender-segregated toilets and accessible facilities for students with disabilities.

The specific results under the three RAs are defined through ten Disbursement-Linked Indicators (DLIs). The scope of each DLI is summarized below.

Results Area 1: Enabling Environment for Green and Quality Education

- **DLI 1.1: Adoption of the National Energy Efficiency Decree for School Infrastructure**. One-time payment upon verified official approval and publication of the National Energy Efficiency Decree for Social Infrastructure.
- **DLI 1.2: Development, Approval and Publication of the Extracurricular Curriculum and AI Education Textbooks.** One-time payment upon verified official approval and publication of the AI education textbooks for use in targeted grades and schools.

- **DLI 1.3: Integration of new ICT classroom requirements into MOES standards.** One-time payment upon verified inclusion of ICT classroom requirements (classroom facilities, specialized desks, interactive smart whiteboards) in MOES standards or regulations.
- **DLI 1.4: Development and approval of teacher-training and training-of-trainers package**. One-time payment upon verified MOES approval of the teacher training program and standardized teacher-training package, such as learning modules, guides for master trainers and district mentors, and assessment methods.

Results Area 2: Improved School Infrastructure and Capacity Expansion

- **DLI 2.1: Number of Additional New, Green and Resilient School Buildings (216 schools).** The project shall deliver 216 new school buildings completed, handed over, and operational with green and sustainable infrastructure in the AIIB shortlist, to agreed minimum standards. The project shall achieve verified progress via phased milestones. Progress is verified through ministerial approval for inclusion into the State Investment Program, approval of DED and ZVOS (national ES safeguards), tender and contract award records, completion certificates, handover and acceptance for commissioning by MOES and school heads, WASH, energy and solar system inspection checklists.
- **DLI 2.2: Number of Additional Operational School Seats Created.** Payments linked to the cumulative increase in operational and registered school seats in State Budget-financed and/or AIIB-financed schools, with an indicative target of 89,940 seats.
- **DLI 2.3: Number of ICT Classrooms Created or Renovated through the CIDCA Grant.** Payments linked to the creation or renovation of 120 ICT classrooms, with disbursements tied to contract award and completion/handover of equipped classrooms.

Results Area 3: Access, Equity and Quality in Education

- **DLI 3.1: Number of Project Schools with reduced student enrollment coefficient.** Payments for each Project school achieving a verified reduction in the student enrollment coefficient, based on school registration and enrollment data.
- **DLI 3.2: Percentage of teachers completing training and obtaining certificates.** Payments upon verification that an agreed percentage of 20% of participating teachers have completed certified training modules and obtained certificates, based on training records and certificates issued to teachers.
- **DLI 3.3: Number of Schools with Inclusivity and Equity in Education Services.** Payments for targeted schools meeting agreed inclusivity and equity standards (e.g., gender-segregated toilets and accessible facilities for students with disabilities), verified through facility audits and school documentation.

2.2.2 Geographic Coverage and School Profile

The RBP will support the expansion of 216 existing general secondary schools across six priority regions: Bukhara, Kashkadarya, Khorazm, Samarkand and Surkhandarya regions and the Republic of Karakalpakstan. The investments will be implemented in two tranches.

The 104 schools included in Tranche 1 have been confirmed and comprise 19 urban and 85 rural schools located across 55 districts and two cities. The specific 112 schools to be supported under Tranche 2 have not yet been finalized. They will be selected from the same six priority regions using the same criteria applied to Tranche 1. The confirmed regional coverage of Tranche 1 is summarized below, and school profiles are in **Table 2.2**.

- **Bukhara Region**: 9 schools in Kogon City (1) and the districts of Gijduvan (2), Jondor (2), Qorakul (2), Romiton (1) and Shofirkon (1).
- **Kashkadarya Region**: 24 schools in the districts of Chiroqchi (4), Kukdala (3), Yakkabog (1), Guzor (2), Kamashi (2), Kasbi (3), Kitob (2), Koson (2), Nishon (2), Dehqonobod (2) and Karshi (1).
- **Khorazm Region**: 10 schools in the districts of Khiva (1), Bogot (1), Khazorasp (2), Khonqa (1), Qushkupir (2), Shovot (2) and Yangiariq (1).
- **Samarkand Region**: The 25 schools are located in the districts of Bulungur (1), Ishtikhon (2), Jomboy (2), Kattakurgan (2), Narpay (2), Nurobod (2), Oqdaryo (1), Pastdargom (2), Payariq (2), Qushrabot (1), Samarkand (3), Toyloq (2) and Urgut (3).
- **Surkhandarya Region**: 26 schools in Termez City (2) and districts of Angor (1), Bandikhon (1), Denov (4), Jarkurgan (3), Oltinsoy (2), Qumqurgan (1), Sarosiyo (4), Sherobod (1), Shurchi (3), Termez (1) and Uzun (3).
- **Republic of Karakalpakstan**: 10 in the districts of Amudarya (1), Beruniy (1), Ellikkala (3), Kungirot (2), Nukus (1) and Turtkul (2).

Table 2.2: School Profile by Region

Region	Schools	Urban	Rural	Existing design capacity	Current enrolment	Total land area (ha)	Occupied with school building (ha)	Unoccupied land (ha)	Proposed expansion capacity
Bukhara	9	2	7	5,578	8,177	23.45	3.22	16.91	3,930
Kashkadarya	24	4	20	10,322	17,863	59.21	5.15	47.99	9.630
Khorazm	10	2	8	6,535	11,132	21.52	2.90	17.68	5,310
Samarkand	25	2	23	14,319	23,238	51.82	5.66	43.99	11,310
Surkhandarya	26	5	21	11,939	21,939	53.69	6.08	47.60	10,620
Karakalpakstan	10	4	6	4,529	7,606	21.52	2.32	10.86	4,200
Total	**104**	**19**	**85**	**53,222**	**89,955**	**231.21**	**25.34**	**185.03**	**45,000**

Overall, the 104 confirmed Tranche 1 schools currently enroll 89,955 students against a combined rated capacity of 53,222 places, representing an aggregate capacity-utilization ratio of approximately 1.69, or 169 percent. The proposed additional buildings will provide 45,000 student places, increasing the combined capacity to 98,222 places. The schools occupy approximately 231 ha, of which about 25.3 ha, or 11 percent, is covered by existing buildings. Roads and other built facilities cover about 9 percent. The remaining 80 percent consists of open spaces and green areas, indicating that the schools generally have sufficient land for the proposed additional buildings.

2.2.3 Selection of Regions and Schools for RBP

The regions and schools for RBP were selected based on the concentration of overcrowded schools and higher capacity utilization ratios driven by demographic pressures, urbanization, and aging infrastructure. Within these regions, individual schools were prioritized using the following criteria:

- **School capacity utilization coefficient ratio.** The coefficient ratio is defined as student enrollment relative to school capacity in terms of seats. Schools with a coefficient ratio of 1.5 to 2.0 are prioritized where, without intervention, the coefficient ratio is projected to exceed 2.0 within the next five to ten years. The schools selected to be financed by AIIB loan proceeds will not be the ones already receiving financing for a similar program from the state budget or other IFIs.

- **Population density and growth.** Schools located in densely populated areas with rapid population growth will be prioritized.
- **Availability of land for expansion**. Schools with adequate spare land within the existing school compound for expansion will be prioritized. This approach will avoid relocating students to other schools during construction.
- **Condition of existing school buildings.** Schools whose existing buildings are in good, safe condition will be prioritized, ideally those that have recently been rehabilitated or renovated. This reflects the considerations that: (i) aging schools may require complete demolition and reconstruction in the near term; (ii) integrating new buildings with recently renovated buildings will be smoother; and (iii) prioritization will help avoid potential technical and reputational risks associated with construction near unsafe buildings.

2.2.4 Physical Works

The Project will construct one additional standardized school building at each of the 216 existing general secondary schools. The proposed 104 buildings under Tranche 1 are categorized into the following four standard models:

- A three-storey building with capacity for 330 students.
- A four-storey building with capacity for 450 students.
- A three-storey building with capacity for 510 students.
- A four-storey building with capacity for 660 students.

The models follow a common structural and architectural approach but differ in building footprint, number of storeys, classrooms and supporting spaces. Their principal features are summarized in **Table 2.3**. Typical external views of the four Tranche 1 models are shown in **Figure 2.1**. Each building will include an elevator and gender-separate toilets for boys and girls on every floor, including three general toilet cubicles and one accessible toilet for each group.

Table 2.3: Principal Features of Model School Buildings

Parameter	**330-student model**	**450-student model**	**510-student model**	**660-student model**
Number of buildings	53	25	6	20
Number of storeys	3	4	3	4
Number of classrooms in each building	11	15	17	22







Figure 2.1: Typical Model School Buildings for 300-student (top left), 450-student (top right), 510-student (bottom left) and 660-student (bottom right)

Civil Works: The main civil works will include:

- Site preparation and temporary works, including construction fencing, work areas, site clearance and controlled demolition where required.
- Surveying and setting out, excavation for foundations and utility trenches, earthworks, backfilling, compaction and site grading.
- Construction of foundations, reinforced-concrete structural frames, floor slabs, staircases and roof structures.
- Construction of external and internal walls, partitions, façades, roofs, waterproofing, doors and windows.
- Internal finishing and fit-out, including plastering, flooring, ceilings, painting, joinery and fixed fittings.
- Installation of internal water-supply, sanitary-drainage, electrical, lighting, ventilation, lift and fire-safety systems.
- External works required for access to and use of the new buildings, including entrance steps and ramps, walkways, local drainage and reinstatement of areas disturbed by construction.
- Installation of ICT equipment for ICT classrooms, including installation of computer workstations, specialized desks and chairs, interactive smartboards or displays, networking equipment, printers and related accessories.

Associated facilities: The associated facilities under the Project will be limited to connecting the new buildings to the water-supply, sewerage and electricity networks available at each school site. These activities will include trenching, pipe and cable installation, tie-in, testing, and reinstatement works.

2.2.5 Implementing Agencies and Partners

The Project will be implemented through existing national and regional government systems. MOES will serve as the focal ministry and coordinate Project implementation with AIIB. The roles of the principal implementing agencies and delivery partners are summarized below.

- **Ministry of Economy and Finance (MOEF)**. The ministry will coordinate public investment planning, budgeting and financing for the Project. It reviews the investment proposals consolidated by MOES, ensures that the required government funding is included in the annual State Investment Program, coordinates external financing and oversees financial management. Payments to contractors and suppliers will be processed through the centralized Treasury system.

MoEF has extensive experience in managing public investment programs and coordinating operations financed by international financing institutions (IFIs).

- **Ministry of Education and Science (MOES).** MOES was established by Presidential Decree No. UP-213 of 3 October 2026 through the merger of the former Ministry of Preschool and School Education and the Ministry of Higher Education, Science and Innovation, and assumes the functions of the former ministry in relation to the RBP. MOES will provide overall Project leadership, coordinate with AIIB and other participating institutions, monitor implementation progress and results, and coordinate education, training, and curriculum-related activities. MOES regional departments, working with the respective regional governments, identify and prioritize schools based on infrastructure needs, enrolment pressure and the agreed selection criteria. They will also coordinate with UCS during implementation, participate in the acceptance and handover of completed buildings, and assume responsibility for their subsequent operation and maintenance. MOES has experience implementing IFI-supported education projects and is responsible for the recently approved World Bank-supported BILIM Program.
- **Ministry of Construction and Housing and Communal Services**. The Ministry establishes and updates the technical standards and standardized designs applicable to school buildings. Its regional/district urban-planning and design-expertise bodies review and approve the site-specific designs and cost estimates before the works are tendered. The Ministry and its regional bodies have substantial experience applying construction standards and reviewing designs for schools and other public infrastructure.
- **Republican Center for Expertise of Urban Planning Documents.** The SE under the MOC is responsible for reviewing and approving the detailed designs and cost estimates for each school. When applying the five standard school building models, the detailed engineering design for each school must be adapted to local conditions based on site surveys. Before any package is submitted for tendering, the detailed engineering design and cost estimate, in the form of bills of quantities, must be reviewed and approved by the SE. The SE applies strict budget controls when reviewing detailed engineering designs and bills of quantities, and strong justifications are required for any deviations from the typical budget for each school building model. Additional improvements to school buildings based on the standard models are permitted but are subject to careful review by the SE with respect to necessity and budget implications.
- **National Committee on Ecology and Climate Change (NCECC).** The NCECC is the competent national authority responsible for environmental regulation, environmental permitting, and environmental compliance monitoring in accordance with national legislation. For the proposed Project, environmental screening, permitting, and oversight of civil works are conducted in accordance with applicable national environmental legislation under the mandate of the NCECC, including through its territorial bodies, where relevant.
- **Ministry of Employment and Labor Resources.** The Ministry of Employment and Labor Resources is responsible for labor and employment-related matters, including labor standards, working conditions, and occupational health and safety (OHS), in accordance with national legislation. The legal framework governing labor and working conditions is well established, including provisions related to non-discrimination, the prohibition of unfavorable working conditions, and the protection of workers' rights. The ministry, through its relevant departments and the State Labor Inspection, is mandated to oversee compliance with labor regulations and workplace safety requirements. In the context of the Project, the ministry is expected to contribute to monitoring compliance with applicable labor and OHS requirements during school construction activities, including through inspections and the handling of labor-related issues.

- **Regional and Municipal Governments and the Unified Customer Services** (UCS). The regional Unified Customer Services, commonly referred to as UCS under the Regional government, will serve as the client-side implementing entities for the civil works. They will manage procurement, construction contracts, and daily technical supervision; monitor construction quality, progress, and compliance with approved designs; verify completed quantities and payment documentation; and coordinate final inspection, commissioning, and handover. UCS are established construction-delivery entities under regional governments and have extensive experience managing State-financed schools and other public infrastructure.
- **Design Institute**. A private Design/EIA Institute has already been engaged for the 104 schools. It will undertake the necessary site investigations, adapt the four standardized building models to site-specific conditions, and prepare the detailed engineering designs, technical specifications and cost estimates. It will also prepare an EIA (ZVOS) for each school.

2.3 Screening and Exclusion of Activities and RBP Boundary

This section: (i) screens the wider Government Program to identify activities that fall within the scope of the RBP; (ii) defines the ES exclusion criteria applicable to otherwise eligible activities; and (iii) establishes the boundary conditions that all activities must satisfy to remain within the RBP.

2.3.1 Screening of Government Program Activities

All Government Program areas and their detailed activities were assessed for potential ES impacts, risks and benefits. Their indicative ES categorization and the justification for their inclusion in or exclusion from the RBP are presented in **Annex 1**. The Government Program activities excluded from the RBP are summarized below:

- Education-service expenditure is partly included. Eligible activities are limited to the extracurricular curriculum, teacher training, and related activities that directly contribute to the Results Areas and DLIs. Regular salaries and other routine personnel expenditure are excluded.
- Preschool capital investment is excluded. Construction, reconstruction, expansion, renovation and equipment for preschool facilities do not contribute to the RBP Results Areas.
- Construction of entirely new general secondary schools is excluded. The RBP does not support the establishment of new schools on new sites.
- Reconstruction and expansion of existing general secondary schools are included. Eligible activities include additional teaching buildings within existing school compounds and the associated site works, utility connections, equipment, testing, commissioning and handover needed to make the additional capacity operational.
- General capital renovation and major repairs are excluded. General programs covering roofs, windows, doors, building services and other major repairs are outside the RBP. Limited refurbishment or adaptation directly required for Project-supported ICT classrooms may be included, subject to ES screening.
- Green, energy-efficient and WASH infrastructure is included where integral to an eligible school investment. Stand-alone investments outside the selected schools or unrelated to the RBP results are excluded.
- Investments in creative and subject-specialized schools are excluded.

2.3.2 ES Exclusion of Otherwise Eligible Activities

An activity that falls within an eligible Government Program area is not automatically eligible for the RBP. Each proposed activity and site must also undergo ES screening as part of the EIA studies. The following will be excluded:

- Activities determined by AIIB to be Category A, or other activities likely to have significant adverse ES impacts that are sensitive, diverse or unprecedented.
- Activities or items prohibited under the AIIB Environmental and Social Exclusion List, including the use of asbestos-containing materials or other substances prohibited under national law or applicable international agreements.
- Activities requiring land acquisition or causing physical or economic displacement, forced eviction, loss of access to land or resources, or adverse impacts on informal users, vendors or livelihood activities.
- Activities involving land subject to unresolved ownership disputes, encumbrances, competing claims or existing uses that cannot be addressed without displacement or loss of access.
- Activities likely to cause significant conversion or degradation of critical or natural habitats, legally protected areas or other areas of high biodiversity value.
- Activities likely to cause significant adverse impacts on known archaeological, historical, religious or other important cultural heritage resources.
- Works involving large-scale demolition or likely to generate significant quantities of asbestos-containing material or other hazardous waste that cannot be safely managed through available national systems.

2.3.3 RBP Boundary Conditions

AIIB financing for the Project will be used to support the government program for expansion and modernization of public schools, with focus on three Result Areas (RA) including RA 1 - enabling environment for green and quality education, RA 2 – improved school infrastructure and capacity expansion, and RA 3 – Access, Equity and Quality in Education. The RBP Scope and relationship with government programs are specified in Table 4. The RBP Scope will not include activities on AIIB's Environmental and Social Exclusion List (ESEL), neither the project activities that fall under the definition of Excluded Activities specified in Chapter 5.D and the Environmental and Social System Assessment (ESSA).

Table 4. Government Programs and RBP Scope

	Government Programs in the education sector	**RBP Scope**
Programs	1. MOES budget and MOES-led development programs	1. MOES budget and MOES-led development programs **Include:** - Textbook renewal in general secondary schools - Replacement of obsolete computer classrooms - National digital content for children - Interactive whiteboards - "Clean Hands" WASH Program - salaries and expenditures for teachertraining[1]. **Exclude:**

[1] As per MOES clarifications, budget expenditure for teachers training program is mainly reflected as part of salaries for staff and teachers in public education system.

		- salaries for staff and teachers, other than those salaries and expenditures for teacher training. - other MOES-led development programs not related to the achievement of result areas.
	2. State Investment Program - Capital investments in education sector under the general coordination of MOES	2. State Investment Program – Capital investments in education sector under the general coordination of MOES **Include:** - capital investments for general secondary schools, which do not involve activities in AIIB's ESEL or Excluded Activities specified in ESSA. **Exclude:** - capital investments for pre-schools - capital investments for creative and specialized schools - capital investments which involve activities in AIIB's ESEL or Excluded Activities specified in ESSA.
	3. Regional and district government budget and regional/district open budget elected for education sector investments	3. Regional and district government budget and regional/district open budget elected for education sector investments **Include:** None **Exclude:** ALL
Duration	2026 - 2030	2026 (after AIIB concept review date May. 25, 2026) – 2030
Geographic Coverage	National Wide	**National Wide:** - for DLI 1.1 – 1.4, DLI 2.2 – 2.3 and DLI 3.2 **Six Priority Regions:** Bukhara, Karakalpakstan, Kashkadarya, Khorezm, Samarkand and Surkhandarya - for DLI 2.1, DLI 3.1 and 3.3
Other boundaries	N/A	**Scope for RBP Specific Expenditures:** - Physical constructions are limited to existing general secondary schools in the six priority regions - Civil work must be undertaken within the existing school compound, on land with verified government ownership or use rights for schools, with sufficient unoccupied space for the proposed building and adequate green land meeting national standards. - Associated facility works are limited to connecting the additional school buildings to water supply, gas, sewerage and electricity

		networks available at the school site. Separate off-site associated facilities are not included. - Positive opinions from SE and SEE and necessary governmental approvals must be obtained before the commencement of project activities, especially physical construction.

2.4 Expected ES Effects of the RBP

The expected ES effects of the RBP are predominantly positive. The Project will expand public school capacity, reduce overcrowding, improve the quality and stability of instructional time, and strengthen institutional systems for planning and delivering educational infrastructure. The beneficiaries of the RBP and main benefits are described below.

- **Direct beneficiaries.** These include students, teachers, families and communities served by the schools supported under the RBP. The additional capacity will help prevent further deterioration of school capacity-utilization ratios resulting from population growth. It will enable some schools to extend instructional time, return to single-shift operation and/or offer extracurricular activities. Students and teachers will benefit from more stable, longer and higher-quality school time in safe, modern and supportive learning environments. Families, particularly mothers who often bear primary responsibility for school-aged children, will benefit from more stable and extended school hours, creating greater opportunities to pursue economic and other productive activities.
- **Institutional beneficiaries.** These comprise participating public schools and MOES. Schools will benefit from safer, less congested learning environments, longer instructional hours, and improved STEM and digital learning resources, thereby strengthening pedagogical delivery and student learning outcomes. At the institutional level, the RBP will strengthen MOES's capacity to operationalize robust results-monitoring frameworks, improve data-driven planning and institutionalize evidence-based budget allocation.

Potential adverse effects are expected primarily from construction within operating school compounds. These effects will generally be localized, temporary, predictable and reversible. As the works are geographically dispersed and are not expected to affect common sensitive receptors, no material cumulative impacts are anticipated. No specific reputational risks are expected to arise from the eligible RBP activities. Nevertheless, the assessment in the following sections considers, where relevant: (i) likely direct, indirect, induced, temporary, permanent and cumulative ES risks, impacts and benefits; (ii) contextual risks; (iii) institutional capacity and complexity risks; and (iv) potential reputational risks.

2.4.1 Potential Environmental Impacts, Risks and Benefits

The potential environmental impacts and risks of the RBP are assessed as Moderate. The main impacts and risks arise from constructing school buildings within existing operating school compounds, together with utility connections. Although construction within functioning schools requires careful management of worker, student and community safety, the works will use standardized designs, remain within existing school compounds and have relatively small individual footprints. Activities with significant, sensitive or irreversible impacts are excluded from the RBP. The anticipated impacts are therefore generally site-specific, temporary, predictable, and reversible, and can be managed through appropriate design, construction controls, and supervision.

The principal potential impacts and risks are as follows:

- **Site preparation and excavation**. Construction will involve site clearance, excavation, earthworks, foundation construction, utility trenches and may include limited removal of existing small structures or paved areas. These activities may temporarily disturb soils, alter localized drainage and create open excavations and unstable surfaces within school compounds.
- **Dust, noise and vibration**. Excavation, material handling, concrete works, vehicle movements and limited demolition may generate dust, noise and vibration. Because the works will take place within operating, and substantially overcrowded, schools, these impacts may disrupt classes and expose students, teachers, school staff, and neighbouring communities if work areas and schedules are not adequately controlled.
- **Surface runoff, wastewater and accidental pollution**. Exposed soils, construction materials, concrete washout, fuel or lubricant spills and wastewater from construction facilities may affect soil, drains or nearby public infrastructure. Inadequate grading or drainage may also cause localized waterlogging or erosion within school compounds.
- **Construction and hazardous waste**. The works will generate excavated material, construction waste, packaging, scrap metal, timber and other residual materials. Paints, oils, chemicals, lamps, electrical equipment, and any unexpected legacy hazardous materials will require separate handling and disposal. Reconstruction works, if required, will be of limited scale and may generate demolition waste, including asbestos waste. Improper storage, transport, or disposal may create safety, soil contamination, and public health risks.
- **Traffic and safety within school compounds**. Deliveries of materials, movement of construction vehicles and equipment, and temporary changes to school access may create collision and pedestrian-safety risks. These risks are particularly important during student arrival and departure times and at schools with constrained entrances or limited separation between the proposed building footprint and areas that remain in school use.
- **Worker health and safety.** Construction of multi-storey buildings will expose workers to falls from height, scaffolding and ladder hazards, lifting operations, excavation collapse, moving machinery, electrical work, hot works, dust, noise, manual handling and extreme weather. Inadequate contractor safety procedures, competent supervision, protective equipment or emergency preparedness could result in serious injuries or fatalities.
- **Removal of trees and existing site features.** Construction may require the removal or relocation of a few individual trees in exceptional cases, paths or other features within school compounds. These effects are expected to be limited to the approved construction footprint and do not involve natural habitats. Excavation also presents a low-probability risk of encountering previously unidentified cultural objects, requiring application of chance-find procedures.
- **Operation and maintenance risks.** Environmental and safety performance may deteriorate if systems are not properly commissioned or if schools lack trained cleaning staff, maintenance budgets, spare parts and service arrangements. Solar panels, batteries, inverters, lamps, ICT, and electrical equipment will also generate lifecycle waste, including electronic waste (e-waste), requiring appropriate collection and management.

The RBP is expected to generate the following environmental and related benefits:

- **Energy efficiency**. Improved insulation, lighting and centralized heating and cooling systems will reduce energy consumption, operating costs and greenhouse gas emissions.
- **Renewable energy**. Solar-energy systems, where included in the approved designs, will reduce dependence on conventional energy sources.

- **WASH and public health**. Improved water supply, toilets, handwashing, drinking water, wastewater, and drainage facilities will improve hygiene and reduce waterlogging and uncontrolled wastewater discharge.
- **Indoor environmental conditions**. Improved ventilation, natural lighting, and thermal performance will provide healthier, more comfortable learning environments.
- **Safety and resilience**. Improved fire, electrical, and seismic safety and climate-resilient design will strengthen the safety, serviceability, and long-term resilience of participating schools.

2.4.2 Potential Social Impacts, Risks and Benefits

The potential social impacts and risks of the RBP are assessed as Moderate. Construction at each school is expected to take approximately eight months and require a peak workforce of about 70 workers. Most workers are expected to be recruited locally, limiting labour influx and the associated pressures on housing, services and communities. Women's participation in the construction workforce is expected to be very limited because manual construction work is traditionally undertaken predominantly by men, reflecting prevailing occupational patterns and the physically demanding nature of much of the work. Although no land acquisition or displacement is anticipated, construction within operating and overcrowded schools presents material but manageable risks to students, teachers, workers and neighbouring communities.

The key potential social impacts and risks are as follows:

- **Disruption to school operations**. Construction noise, restricted access and temporary changes to the use of school grounds may disrupt classes, extracurricular activities and the movement of students and staff.
- **Child and community safety**. Open excavations, construction equipment, vehicle movements, and unauthorized access to work areas may present safety risks, particularly to younger students and children with disabilities.
- **Labour and working conditions**. Risks include informal recruitment, unclear employment terms, delayed wages, excessive working hours, discrimination and inadequate worker grievance arrangements. Forced labour and child labour are prohibited but require monitoring through contractor management and site supervision.
- **Worker conduct and SEA/SH**. The presence of a predominantly male construction workforce within operating schools may create risks of inappropriate behaviour, harassment or SEA/SH involving workers, school staff, students or community members. These risks are moderated by the relatively small, mainly local workforce but require controlled site access, worker Codes of Conduct, and confidential reporting channels.
- **Temporary loss of school space.** Construction may temporarily reduce access to playgrounds, sports areas, pathways or other parts of school compounds. Site planning will need to maintain safe access to classrooms, toilets and emergency exits.
- **Land availability and use of open space**. Existing school buildings cover about 25.34 ha, or 11 percent of the total area, while roads and other built or operational areas account for approximately 20.85 ha, or 9 percent. The remaining 185.03 ha, or approximately 80 percent, is recorded as unoccupied land. At the aggregate level, these data indicate that the schools generally have sufficient land within their existing compounds to accommodate the proposed additional buildings and support the RBP's approach of avoiding land acquisition. However, site-specific land screening, EIA and detailed design must confirm that sufficient suitable land is available and that the proposed footprint will not displace formal or informal uses or adversely affect playgrounds, sports areas, gardens, access and emergency routes, utilities, trees, drainage, vendors, or other school and community uses. Equivalent land information is not yet available for the 112 Tranche

2 schools; each proposed school must meet the same land-availability and ES eligibility criteria before inclusion. Any school requiring land acquisition, voluntary land donation, physical or economic displacement, or resolution of a material land dispute will be excluded from the RBP.

- **Equitable access to benefits**. Girls, children with disabilities, students from poorer households and those in rural or remote communities may benefit less if accessibility features, gender-responsive facilities, inclusive learning materials and targeted support are not consistently provided and maintained.
- **Stakeholder engagement and grievances**. Inadequate communication about construction schedules, access restrictions and safety arrangements, or ineffective handling of complaints, could cause localised dissatisfaction among school communities.

The RBP is expected to generate the following substantial and sustained social benefits:

- **Reduced overcrowding**. Additional capacity will help prevent further deterioration in capacity utilization ratios and provide less-congested learning environments.
- **Improved instructional time.** Additional classrooms will enable some schools to extend instructional hours, reduce multiple-shift operation and offer extracurricular courses.
- **Safer and more inclusive schools.** Ramps, elevators, accessible toilets and separate sanitary facilities for girls and boys will improve dignity, safety and access, particularly for girls and children with disabilities.
- **Improved learning opportunities**. Modern classrooms, STEM, and digital-learning facilities will strengthen teaching quality and student learning opportunities.

3 Assessment of Borrower's ES Management Systems

The RBP will be implemented through Uzbekistan's existing national ES management systems. It will rely on the applicable legal and regulatory framework, established institutional arrangements, and existing government procedures for planning, implementation and monitoring of school infrastructure. This chapter assesses whether these systems are adequate and effective for managing the ES risks and impacts identified for the RBP.

The assessment uses the core principles and core elements set out in AIIB's ESP and RBF Interim Guidance Note as its benchmark. It examines the extent to which the national systems are consistent with these principles and identifies any differences or gaps. The assessment also covers operational performance across various stages of project activities, including school planning and site selection, detailed design, EIA and SEE approval, procurement, construction and supervision, commissioning and handover, and operation and maintenance.

3.1 Policy and Legal Framework for Managing ES Effects of the RBP

3.1.1 Description of the applicable ES policy and Legal Framework

The national laws, regulations, codes and standards relevant to managing the ES risks and impacts of the RBP have been identified and are presented in detail in **Annex 2**. The Annex summarises the relevant provisions, explains their application to the RBP and identifies the responsibilities of MOES and other implementing agencies for ensuring compliance. An overview of the important regulations is given below.

Law on Environmental Expertise: The principal requirements governing environmental assessment and approval are established by the Law on Environmental Expertise, Environmental Impact Assessment and Strategic Environmental Assessment, No. ZRU-1036, which entered into force on 25 August 2025, and Cabinet of Ministers Resolution No. 234 on Measures to Introduce New Environmental Impact Assessment Mechanisms, which enters into force on 14 August 2026. These instruments establish the environmental assessment framework applicable during RBP implementation. Law No. ZRU-1036 replaced the previous Law on Environmental Expertise of 2000, while Resolution No. 234 replaces Resolution No. 541 of 2020.

The new framework divides activities and facilities into three categories based on the scale of the activity and the potential environmental impacts. These comprise Category I for activities with a high level of environmental risk, Category II for activities with a moderate level of risk and Category III for activities with a low level of risk. Educational institutions, including general secondary schools, are classified as Category III. An EIA is therefore required for construction at each RBP school, and the EIA documentation must be submitted for SEE. Construction shall proceed only after a positive SEE conclusion has been obtained.

Public consultation during EIA. Law No. ZRU-1036 establishes public participation, free access to information and openness as governing principles of environmental assessment, and Article 17 places a duty on the initiator to conduct public hearings before SEE. The procedure applicable to a particular object, including whether a hearing is required, is determined under the implementing resolution. Under Resolution No. 234, effective from 14 August 2026, the Ecology Committee determines within three working days of receiving the application whether a public hearing is required, taking into account the location of the object, areas potentially exposed to significant adverse impacts, and existing levels of environmental pollution. Separately from this statutory process, regional Ecology Committees reported during the ESSA consultations that public consultation is commonly conducted for school-construction EIAs as a matter of practice and considered that it should be routinely carried out. For each participating school, the Design/EIA consultant will obtain the Ecology Committee's determination and the Program will

comply with it; independently of that determination, the Program will carry out proportionate engagement with school communities throughout implementation.

Urban Planning Code and school design standards. The Urban Planning Code (Law No. LRU-676 of 22 February 2021), together with applicable construction, seismic, fire-safety, accessibility and sanitary standards, governs the planning, design, technical review, construction, supervision and commissioning of school buildings. These requirements address structural and seismic safety, fire and emergency egress, sanitation, lighting, ventilation, energy efficiency, accessibility and safe circulation. School-specific WASH and facility requirements are further established in SanPiN Nos. 0341-16 and 0288-10. The design consultant is responsible for preparing compliant designs and obtaining the required technical approvals.

Land Code. The RBP will finance works only within existing school compounds and excludes activities requiring land acquisition, voluntary land contribution, demolition of third-party assets, restrictions on access or physical or economic displacement. As part of the ES Screening and the EIA studies, the design/EIA consultant and MOES cadastre authorities will verify cadastral documents, school boundaries, ownership, existing land uses, encumbrances, informal users and any competing claims.

Tree cutting. Presidential Decree No. UP-46 of 30 December 2021, as amended and read with Presidential Decrees Nos. UP-5863 and UP-6155, establishes an indefinite moratorium on cutting or damaging valuable tree and shrub species outside the State Forest Fund. Tree removal must first be avoided through site selection and adjustment of building layouts. Where removal is lawfully exempted, prior authorization must be obtained from the Ecology Committee. At least 10 large seedlings of equal or greater ecological value must be planted for each tree or shrub lawfully removed and maintained for not less than two years. Illegal cutting or destruction requires planting 100 seedlings for each affected tree or shrub and maintaining them for at least three years, in addition to applicable fines, environmental compensation and sanctions under the “Transparent Construction” rating system. New buildings exceeding 12 m in height or 500 m² in total area must allocate at least 25 percent of the project land plot for greening.

- **Procedure where trees are affected**. The tree-cutting procedures are detailed in **Annex 2.1**. Responsibilities are distributed through the existing design, permitting, contracting, supervision and handover arrangements. The Design/EIA consultant identifies and records existing trees within and adjacent to the proposed footprint as part of the ZVOS documentation and adjusts the building layout to avoid them. Before the SEE conclusion is issued, the district environmental inspector of the regional Ecology Committee inspects the site and records each tree. Where removal cannot be avoided and falls within a recognised exemption, the initiator applies to the regional Ecology Committee for prior authorisation, which determines the compensatory planting obligation and any payment for damage caused to flora. The obligation to plant, and the cost of doing so, rest with the initiator and are discharged through the works contract: compensatory planting. UCS supervises implementation during construction and records it in the supervision file. On completion, the joint acceptance inspection verifies that the required greening has been carried out. After handover, the MOES regional branch and the school administration are responsible for the preservation and care of the trees attached to the building and for maintaining compensatory planting for the required period.

Air pollution and waste. The Law on Protection of Atmospheric Air regulates dust and exhaust emissions from excavation, material handling, construction machinery, vehicles and generators. The Law on Waste, as most recently amended by Law No. ZRU-1109 of 20 December 2025, together with Cabinet of Ministers Resolutions Nos. 266 and 295, governs the classification, registration, collection, storage, transport, recycling and disposal of construction, domestic and hazardous waste. These requirements apply to demolition debris, excavated materials, chemicals, spent lamps, batteries, solar equipment and electrical

and e-waste. Sanitary Rules and Norms No. 0158-04 and related occupational sanitary requirements govern the identification, handling, packaging, transport and disposal of asbestos-containing waste.

E-waste management. Uzbekistan does not have separate legislation dedicated exclusively to electronic waste. E-waste is regulated under the Law on Waste, No. 362-II of 5 April 2002, as amended, and the broader requirements governing waste identification, accounting, collection, temporary storage, transportation, recycling and disposal. Presidential Decree No. PF-149 of 26 September 2024 established the Waste Management and Circular Economy Development Agency, and Cabinet of Ministers Resolution No. 648 of 16 October 2025 approved its organizational arrangements and Charter. The Agency is the authorized national body responsible for developing and implementing unified waste-management norms and standards, coordinating waste-management activities, improving the regulatory framework and monitoring waste-management service providers. Its mandate expressly includes improving the management of electronic waste, introducing modern recycling methods and promoting circular-economy and "zero-waste" principles.

Labour. The Labour Code (Law No. LRU-798 of 28 October 2022, effective from 30 April 2023) regulates employment contracts, wages, working hours, leave, termination, non-discrimination, worker representation, and labour dispute resolution. It prohibits forced labour and child labour and establishes protections and restrictions for workers under 18. The contractors will require documented employment arrangements, timely payment, lawful working hours, age verification, equal opportunity and access to a confidential worker grievance mechanism without retaliation.

OHS. The Law on Labour Protection (Law No. LRU-410 of 22 September 2016) and Cabinet of Ministers Resolution No. 1066 of 31 December 2018 require employers to provide safe workplaces, assess and control risks, provide worker instruction, training and PPE, arrange medical examinations where required, provide first aid, and investigate and register occupational accidents and diseases. These requirements are directly relevant to excavation, demolition, work at height, electrical and lifting activities, machinery use, asbestos, hot work and construction within operating schools.

Sexual exploitation, abuse and sexual harassment (SEA/SH). Uzbekistan's legal framework prohibits sexual harassment and related forms of sexual abuse and exploitation. Article 41-1 of the Code on Administrative Liability, introduced by Law No. ZRU-829 of 11 April 2023, penalises unwanted acts of a sexual nature that degrade a person's honour and dignity, including remarks, gestures, touching and calls, irrespective of the victim's sex. Articles 121 and 141-3 of the Criminal Code penalize coercion into sexual relations where the victim is dependent on the perpetrator, including through employment, and the non-consensual distribution or threatened distribution of intimate images. Aggravated penalties apply where the victim is under 18. Law No. ZRU-561 on Protection of Women from Harassment and Violence provides for protective orders and workplace measures to prevent direct contact between the victim and perpetrator. The Law on Guarantees of the Rights of the Child also prohibits persons convicted of specified sexual or violent offences from working in educational institutions or undertaking activities involving direct contact with children.

Access to Information. Law No. ZRU-445 on Appeals of Individuals and Legal Entities and the Law on Guarantees and Freedom of Access to Information govern access to information, submission and consideration of appeals and the operation of government grievance channels.

3.1.2 Assessment of Applicable ES Policy and Legal Framework vis-à-vis Core Principles of RBF

The applicable national ES policy and legal framework was assessed against the AIIB RBF Core Principles and Core Elements, considering both the adequacy of the applicable requirements and their

implementation in practice throughout the RBP lifecycle. **Table 3.1** summarises the assessment against each Core Principle and identifies the principal gaps requiring system-strengthening measures under the RBP. The detailed question-by-question assessment is provided in **Annex 4**, while the corresponding measures are incorporated into the Action Plan.

Table 3.1: Assessment of Applicable ES Systems Against AIIB Core Principles

Core Principle	Assessment Against Core Principles	Gaps
Core Principle 1: Promote environmental and social sustainability in the RBP's design.	Uzbekistan has a comprehensive legal and regulatory framework covering the principal ES risks of the RBP. Law No. ZRU-1036 and Resolution No. 234 establish environmental categorization, EIA preparation, SEE review and monitoring of compliance. School construction is classified as Category III and requires EIA documentation and a positive SEE conclusion before construction. The Ecology Committee independently verifies the potential ES impacts through site visits before issuing the SEE conclusion. The Urban Planning Code and applicable standards address structural and seismic safety, fire safety, WASH, accessibility and energy efficiency. The standard RBP school designs include environmental and social sustainability features.	MOES does not have adequate ES staffing to coordinate, monitor and support implementation of the RBP's ES requirements. A consolidated system for MOES to monitor ES performance and submit periodic ES reports covering all participating schools is also not established. These gaps are addressed through Action Plan (AP) 1 on ES staffing, AP7 on engaging construction supervision and AP8 on ES monitoring and reporting.
Core Principle 2: Avoid, minimize or mitigate adverse impacts and promote informed decision-making relating to the RBP's environmental and social impacts.	The EIA and SEE process identifies mitigation measures for construction impacts. Other applicable laws and standards address school design, tree protection, pollution, waste, labour, OHS, child and community safety, accessibility and grievance redress. Resolution No. 234 requires the Ecology Committee to determine whether public hearings are needed for individual schools. Where required, hearings must be completed before the EIA is submitted for SEE. Regional Ecology Committees reported that consultations are commonly conducted for school EIAs. Government appeal mechanisms also provide established channels for receiving and addressing grievances. The RBP also applies eligibility and exclusion criteria before schools are approved and tendered.	Stakeholder engagement is not systematically planned and inclusive. Construction contracts also do not consistently include standardized ES Specifications that require dedicated contractor ES staffing and regular ES performance reporting. These gaps are addressed through AP2 on Stakeholder Engagement and AP5 on Standard ES Specifications for School Works Contracts.
Core Principle 3: Avoid, minimize or mitigate adverse impacts on natural habitats and physical cultural resources	The participating schools are located in already developed areas, and no significant impacts on natural habitats or cultural heritage are anticipated. The RBP will finance construction only within existing school compounds and will not include activities that could significantly affect critical or natural habitats, protected areas or known cultural heritage resources. National legislation protects vegetation, wildlife, protected areas, archaeological heritage and other cultural heritage	Chance-find procedures are not systematically included in school construction contracts. This gap will be addressed through AP5 on Standard ES Specifications for School Works Contracts.

Core Principle	Assessment Against Core Principles	Gaps
resulting from the RBP.	resources. Tree removal is subject to the moratorium, prior authorisation and compensatory planting requirements. Although known cultural heritage resources are not expected to be affected, excavation may result in accidental discoveries of archaeological or cultural heritage sites.	
Core Principle 4: Protect public and worker safety against potential risks associated with the construction and operation of facilities under the RBP.	Uzbekistan's Labour Code, the Law on Labour Protection, construction safety standards, and related regulations establish requirements for safe working conditions, risk control, worker training, PPE, medical examinations, accident investigation, and employer liability. The Labour Inspectorate has authority to inspect workplaces and enforce compliance. The Urban Planning Code and applicable seismic, fire-safety, sanitary and accessibility standards address the safety of school buildings and facilities. National laws also prohibit sexual harassment, sexual coercion and violence and provide protection and redress mechanisms. These requirements are particularly relevant because construction will take place within operating school compounds and may involve interactions among workers, students, staff, and communities. UCS inspectors provide daily construction supervision, including monitoring of construction and worker safety. The Ecology Committee and Labour Inspectorate may undertake independent inspections, particularly in response to grievances or reported incidents.	Construction contracts do not systematically require worker Codes of Conduct that address appropriate behaviour, SEA/SH, and interactions with children and school communities. This gap will be addressed through AP5 on Standard ES Specifications for School Works. UCS inspectors must understand the additional ES monitoring requirements of the RBP. This will be addressed through AP6 on Capacity Building for UCS Inspectors. Existing grievance channels do not provide a clearly established confidential mechanism for reporting SEA/SH concerns. This gap will be addressed through AP4 on Confidential Reporting of SEA/SH Complaints
Core Principle 5: Manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement and assists affected people in improving, or at least restoring, their livelihoods and living standards.	The RBP will finance works only within existing school compounds. The exclusion criteria prohibit activities requiring land acquisition, voluntary land donation, demolition of third-party assets, restrictions on access, or physical or economic displacement. This will be confirmed during the ES screening and EIA process by verifying land ownership, cadastral boundaries and existing formal and informal uses of the proposed construction area. Any school requiring additional land or resulting in displacement will be excluded from the RBP.	No gap identified. Compliance will be ensured through the application of the RBP exclusion criteria and the site-screening process during the EIA study.
Core Principle 6: Give due consideration to	Uzbekistan's legal framework provides for equal access to education, non-discrimination, gender equality, protection of children and the rights of persons with disabilities. The	Stakeholder engagement does not systematically ensure and document the meaningful

Core Principle	Assessment Against Core Principles	Gaps
the cultural appropriateness of, and equitable access to, RBP benefits, with particular attention to the needs and concerns of vulnerable groups	RBP will improve school infrastructure in overcrowded and underserved areas. Standardized school designs include accessibility features and gender-disaggregated WASH facilities. DLI 3.4 further promotes inclusive and equitable access to education facilities and services, particularly for girls and children with disabilities. No Indigenous Peoples or culturally distinct communities meeting the applicable criteria have been identified in the RBP area	participation of vulnerable groups, particularly girls, children with disabilities, students from disadvantaged households, female teachers and Mahalla members. This gap will be addressed through AP2 on inclusive stakeholder engagement.
Core Principle 7: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas or areas subject to territorial disputes.	The RBP is not located in areas of recognized fragility or post-conflict zones, and no conflict dimension arises from the proposed school-construction activities. National law does not require a conflict-risk assessment, and none is considered necessary for the RBP. The only sensitivities relevant to the RBP are likely to arise from interactions between construction workers and school communities. These will be managed through effective disclosure of grievance mechanisms and accessible channels for raising concerns.	Grievances received through different government channels are not systematically consolidated and analysed at the RBP level. Consequently, delays, recurring concerns and emerging community tensions may not be identified promptly. This gap will be addressed through AP 3, which strengthens the existing grievance mechanism.

3.2 Assessment of Institutional Capacity for Addressing ES Effects

3.2.1 Description of Existing ES Institutional Setup

Responsibility for implementing the ES system applicable to the RBP is divided among national implementing institutions, regional construction-delivery bodies and specialist regulatory authorities. At the national level, the principal institutions are MOES and the Ministry of Construction and Housing and Communal Services (MoCHS).

- **MOES and its Project Coordination Office (PCO)**. MOES has established a dedicated Project Coordination Office (PCO) for the preparation and implementation of the Project, composed of government staff and a team of specialists in project management, ES, procurement, financial management, monitoring, and evaluation. As the Project has both RBF and IPF components which apply different policies and systems, the actual project implementation, management, supervision and monitoring arrangements are planned as follows.
    a) **RBF**. The RBF component of the Project will be implemented through the Uzbekistan national system, while MOES will be responsible for the overall coordination, supervision, and monitoring. MOES is also responsible for project preparation, assisted by AIIB's Project Preparation Special Fund (PPSF) grant to prepare the detailed engineering designs (DED) and environmental impact assessments (ZVOS) for each school to be financed under the RBF component, as well as the design and technical specifications for STEM labs, ICT classrooms, and AI education classrooms.
    b) **IPF**. The IPF component of the Project will be implemented by MOES and its PCO. Through its PCO, MOES will engage consulting services for project management support;

independent verification; and construction supervision, including OHS supervision and ES monitoring, to further enhance the capacity of MOES regional branches and facilitate RBP implementation. These activities will be prepared, procured, and implemented in accordance with AIIB policy requirements

- **MOCHS**. MoCHS is responsible for national construction policy, construction norms and standards, and the system for review and approval of design and cost-estimate documentation. For the RBP, MoCHS will coordinate the preparation of the construction tender documentation and ensure that the Standard ES Specifications for School Works are included in the bidding documents. Site-specific procurement and contract administration will subsequently be undertaken by the relevant regional UCS.
- **National Committee on Ecology and Climate Change** (NCECC). The NCECC is the competent national authority responsible for environmental regulation, environmental permitting, and environmental compliance monitoring in accordance with national legislation. For the proposed Project, environmental screening, permitting, and oversight of civil works are conducted in accordance with applicable national environmental legislation under the mandate of the NCECC, including through its territorial bodies, where relevant.

At the regional level, implementation involves the regional MOES departments and Unified Customer Service (UCS). These entities coordinate Program implementation and translate the approved designs, SEE conditions and RBP-specific ES requirements into procurement, contract administration, construction supervision and site-level action.

- **Regional MOES departments**. Regional MOES departments will coordinate with UCS, regulatory authorities, and school administrations to support implementation of the RBP's ES requirements. A senior officer within each participating regional department should be designated as the regional ES focal point.
- **Regional Single Customer Service**. The UCS operates under the relevant regional government and acts as the technical customer, procuring entity and contract administrator for public construction. Its functions are established principally under Presidential Resolution No. PP-378 and Cabinet of Ministers Resolution No. 321. UCS manages procurement, administers construction contracts, appoints certified technical-supervision inspectors, verifies completed works and payments, and coordinates commissioning and handover. Its district-level inspectors visit active construction sites daily and may issue corrective instructions, reject non-compliant work or materials, withhold certification, and suspend unsafe work. UCS will therefore be the principal institution responsible for routine monitoring of contractor compliance with the SEE conditions.
- **Cadastre Agency**. The State Committee for Land Resources, Geodesy, Cartography and State Cadastre (Cadastre Agency) is responsible for land administration, including land allocation, registration, cadastral mapping and maintenance of land records. The Cadastre Agency does not have a direct implementation or oversight role in the RBP. However, it may provide technical assistance on land-related matters where required, including confirmation of land boundaries, verification of land status, and support in resolving land registration or cadastral issues that may arise during project preparation or implementation. Its involvement is therefore limited to an advisory and facilitative function on land administration issues, as needed.

Regulatory enforcement of construction, environmental, labour, and OHS requirements is carried out by the Ecology Committee, the Labour Inspectorate, and the State Architectural and Construction Supervision Inspectorate (GASN). These agencies operate through regional and district structures and have statutory powers to inspect works, issue mandatory directions and apply enforcement measures.

- **Regional Ecology Committee**. The Ecology Committee is responsible for reviewing EIA documentation and issuing the positive SEE conclusions required for school construction. Before a conclusion is issued, the relevant district environmental inspector conducts a site visit and records observations on existing environmental conditions, trees, utilities and other site-specific sensitivities. The resulting SEE conditions and recommendations are binding on the proponent, and no school construction may begin without a positive SEE conclusion. During construction, the Ecology Committee's direct site-monitoring role is more limited and is primarily triggered by public complaints and reported violations.
- **Regional Labour Inspectorate**. The Labour Inspectorate is responsible for regulatory oversight of compliance with labour and OHS legislation. Its inspectors may inspect construction sites, investigate occupational accidents, review worker contracts, safety instructions, training and PPE, and issue mandatory corrective measures or sanctions. Construction inspections are primarily triggered by worker complaints, reported incidents, identified violations or other statutory grounds.
- **GASN**. GASN is an independent executive body reporting directly to the regional Cabinet of Ministers. It registers the commencement of construction and conducts periodic, risk-based inspections to verify compliance with approved designs, construction legislation, technical regulations, and building safety standards. GASN will visit during key stages of progress, usually 4 times during the entire construction period. GASN may issue mandatory directions, require corrective action, suspend non-compliant or unsafe works, impose enforcement measures and verify compliance before a completed facility is authorised for use. Its mandate principally covers construction quality, structural and seismic safety, and conformity with approved documentation.

3.2.2 Assessment of the Adequacy of Institutional Resources

The adequacy of institutional resources for the key relevant agencies is assessed and summarised below:

- **MOES and the PCO**. MOES has experience coordinating education-sector programs financed by the World Bank, Islamic Development Bank (IsDB) and other development partners. Its experience has primarily involved sector planning, policy oversight, coordination with financing institutions and implementation of project-specific activities. Under previous externally financed operations, ES requirements were generally managed by consultants, supervision engineers or other specialists engaged for individual projects. Consequently, MOES has not maintained permanent institutional capacity for managing the ES aspects of school construction.

  Under the existing government system, MOES does not have a dedicated ES department, permanent ES staff, a separate budget line for ES management or a regular ES training program. For the RBP, MOES has established a PCO and engaged an environmental consultant. MOES has also engaged a Design/EIA Consultant to prepare the school designs and EIAs. The consultant's team includes an environmental specialist, a social safeguards specialist, a gender specialist and a communications specialist. However, this multidisciplinary team primarily supports EIA preparation for all schools, while the environmental consultant alone cannot adequately cover the social aspects of the RBP during implementation. A qualified social consultant and designated regional ES focal points are therefore required during Project implementation.

- **Unified Customer Service** (UCS). UCS has the strongest operational presence with regional and district-level staffing. Field consultations indicated that approximately two to three technical inspectors are assigned to each district. Active construction sites are reportedly visited at least once daily, although an individual inspector may be responsible for several sites. This district-level presence and regular access to works provide a strong basis for routine ES monitoring. However,

the large number of construction sites and the workload of individual inspectors may limit the frequency and depth of monitoring at each site.

UCS technical staff are subject to an established professional certification system. Field consultations indicated that certification is renewed every three years following approximately one month of training and an examination. Four certification levels were reported, with Category III certification required for technical supervision of school construction. Inspectors also receive additional training when construction legislation changes and may receive sector-specific training, including training on OHS from relevant government agencies.

- **Ecology Committee**. The Regional Ecology Committee and its district inspectorates are reported to have adequate staffing, with approximately five inspectors in each district. Field consultations indicated that the environmental review system is operational and has sufficient technical capacity to receive and review EIA documentation and undertake site verification. Its resources are considered adequate for environmental review, permitting and targeted enforcement.
- **Labour Inspectorate**. The Regional Labour Inspectorate has an established territorial structure, with approximately one to two inspectors assigned to each district. Field consultations indicated that inspectors have adequate technical capacity to inspect working conditions, investigate occupational accidents and respond to labour and OHS complaints and violations

3.3 Operational Performance in Managing ES Effects

The assessment of operational performance examines how the applicable ES system is implemented throughout the RBP lifecycle. It is based on a review of representative designs, environmental approval documents, contracts, construction-monitoring arrangements and existing school operations. The assessment covers the following stages:

- **Planning stage**: Review of the model school designs, a sample school EIA and the corresponding SEE conclusion.
- **Procurement stage**: Review of sample construction contracts to assess the inclusion of environmental, labour, OHS, community-safety and other relevant ES requirements.
- **Implementation stage**: Review of the construction-monitoring arrangements, including the inspection practices and monitoring tools used by UCS.
- **Operation stage**: Review of the operational performance of existing schools, including the functionality, accessibility and maintenance of school facilities after handover.

3.3.1 Review of Model School Designs

The ESSA reviewed the architectural layouts for the standardized teaching buildings proposed under the RBP. The principal observations from the design review of model school designs are as follows:

- **Classrooms**. Each standard classroom is designed to accommodate 30 students.
- **WASH facilities**. Separate toilet facilities for boys and girls are provided on every floor and are located at opposite ends of the building. Each standard toilet facility includes three toilet cubicles.
- **Accessible toilets**. Separate accessible toilets are provided for boys and girls, adjacent to the corresponding general toilet facilities.
- **Accessibility**. Each model includes an entrance ramp and a passenger elevator serving all floors, providing step-free access throughout the building.
- **Stairways and circulation**. The designs include two stairwells, together with entrance lobbies and corridors providing access to classrooms and other facilities.

- **Seismic and structural safety**. The use of reinforced-concrete frames provides an appropriate structural basis for school buildings in Uzbekistan's seismic zones.
- **Learning facilities**. The models include general classrooms, teachers' rooms, a library, a STEM laboratory and digital-learning or ICT facilities.
- **STEM laboratory safety**. The design includes fire extinguishers, fire blankets, first-aid and burn kits, eyewash facilities, emergency showers, electrical and gas cut-off switches where applicable, smoke or heat detection, emergency instructions and unobstructed escape routes.
- **ICT classroom design**. The typical ICT classroom layout provides 15 student workstations positioned around the perimeter, a teacher workstation, an interactive display, a printer, secure data and electrical connections.
- **Fire and life safety**. The designs include two means of vertical circulation, fire-detection and firefighting equipment, emergency lighting and fire-water storage or supply arrangements.
- **Energy efficiency and renewable energy**. The designs incorporate thermal insulation, efficient heating, ventilation and lighting systems, together with rooftop solar panels or other renewable-energy measures.

Overall, the model designs incorporate important provisions for gender-separated WASH facilities, accessibility, seismic and fire safety, modern STEM and digital learning, energy efficiency and improved educational environments.

3.3.2 Review of the Sample EIA

The reviewed EIA was prepared in 2026 for the construction of a new four-storey general education school in the Abat Makan mahalla of Nukus City, Republic of Karakalpakstan. The proposed school has a capacity of 1,650 students and will be constructed on a 1.93-hectare site. It is a new school and not the reconstruction or expansion of an existing school. The proposed facilities include the school building, sports grounds, internal roads, landscaped areas, a coal-fired boiler house, a wastewater treatment plant, water and electricity connections, solar panels and fire-safety facilities.

The EIA table of contents includes: (1) Introduction; (2) Location Plan of the Facility, Specifying the Types of Use of the Territory; (3) Volume of Research Conducted on Environmental Impact and Information Sources Used in the Impact Assessment Process; (4) Relief, Climate, Geographical, Hydrogeological and Morphological Conditions of the Territory; (5) Water Flow Rate and Wastewater Disposal Conditions; (6) Placement of Generated Waste; (7) Effect of the Facility on Atmospheric Air; (8) Changes in the Environment and Forecast of Environmental Consequences; (9) Description of the Accident Situation Analysis; (10) Environmental Protection Measures; (11) Creation of Green Areas and a Green Belt; (12) References; and (13) Appendices. The appendices include the Presidential Resolution authorizing the school construction program; the Land Plot Cadastre Passport; and the State Registration Certificate for Rights to the Land Plot.

The review findings on the EIA are presented below:

- **ES screening**. The ES screening includes the current land uses and the cadastral passport and state registration certificate for the proposed school area, including its cadastral number, permitted use for school construction and permanent land-use right. These documents provide reasonable evidence of the legal allocation of the site.
- **Assessment of impacts**. The EIA addresses construction and operational impacts on air quality, noise and vibration, water, wastewater, waste, soil, flora and fauna, and emergency risks. It provides calculations for water demand, wastewater, waste generation and emissions from

construction machinery and the coal-fired boiler. Labour, OHS, and community safety-related risks were not covered.

- **Assessment of mitigation measures**. The EIA proposes road watering, reduced vehicle speeds, designated traffic routes, covered trucks, wheel washing, noise controls, efficient water use, wastewater treatment, restoration of disturbed land, landscaping and emergency preparedness. Waste-management measures include establishing a fenced and hard-surfaced temporary storage area; segregating waste; using containers or bags; separating recyclable and hazardous waste; and arranging scheduled removal by authorised organisations. Municipal and mixed construction waste would be transported to a landfill under contract. Scrap metal, paper and LED lamps would be transferred to recycling or specialised organisations. Excavated soil, brick and concrete waste are proposed for reuse on site.
- **Monitoring and reporting**. The EIA includes dust-control measures, regularly checking their effectiveness and taking corrective action where necessary. However, it does not provide a structured monitoring plan and reporting requirements from the contractor.
- **Stakeholder consultations**. The EIA sample reviewed contains no record of stakeholder consultation or of a public hearing conducted during EIA preparation. This is consistent with the position described in Section 3.1.1, under which a hearing is held only where the Ecology Committee so determines, but it also indicates that the consultation practice reported by regional Ecology Committees is not evidenced in the documentation reviewed.

3.3.3 Review of the State Environmental Expertise (SEE) Conclusion

The ESSA reviewed the positive SEE conclusion issued by the Regional Ecology Committee for the school discussed in the preceding section. The conclusion was issued on 3 March 2026 and is valid for 3 years. It provides formal environmental approval for the school. It establishes mandatory conditions relating to the protection of utilities and sensitive areas, tree preservation, landscaping, waste management, dust control, topsoil conservation and renewable energy. The SEE conclusion imposes the following conditions:

- Before construction begins, the protection zones of engineering and utility networks located near the site must be preserved. These include gas, water and electricity networks, roads, communication lines and other infrastructure.
- The siting and construction of the facility must not affect historical and cultural areas, recreational areas, water-protection zones or other protected sites.
- If any additional domestic, social, industrial, utility or other facility not included in the approved design is subsequently proposed at the site, its environmental-impact category must be determined. The required EIA documentation must then be prepared and submitted for SEE.
- Cutting or damaging trees within or near the construction area is prohibited in accordance with Presidential Decree No. UP-46 dated 30 December 2021.
- In accordance with the nationwide “Yashil Makon” and “Green Belt” programs, at least 25 percent of the site must be landscaped and planted with trees and other vegetation, pursuant to Presidential Decree No. UP-199 dated 23 November 2023.
- Landscaping and greening around the facility must be maximised.
- All waste generated during construction must be collected, removed and safely managed in accordance with Presidential Resolution No. PP-81 dated 31 May 2023.
- Construction waste must be managed in accordance with Cabinet of Ministers Resolution No. 40 dated 28 January 2021 on improving procedures for activities involving construction waste.
- Construction and municipal waste must be regularly transported to an authorised municipal waste-disposal site under a contract with a sanitation or waste-collection enterprise.
- Construction activities must comply fully with Sanitary Rules and Norms No. 0350-17.

- The siting of the facility must comply fully with Cabinet of Ministers Resolution No. 981 dated 11 December 2019.
- Measures must be implemented to prevent dust from construction materials from dispersing into the atmosphere and to minimise dust emissions.
- Solar panels must be installed in accordance with Presidential Resolution No. PQ-57 dated 16 February 2023 on accelerating the introduction of renewable energy and energy-saving technologies.
- The upper 30 cm of fertile topsoil must be stripped from the construction footprint and reused in areas designated for planting.
- If the conditions of the SEE conclusion are not fulfilled, or if the facility is used for activities that differ from those covered by the approved EIA, the SEE conclusion will lose its validity.

3.3.4 Review of Procurement and Contract Documents

Government-financed construction works are procured using standard tender and contract documents through the national *Shaffof Qurilish* ("Transparent Construction") electronic procurement system. The system includes an electronic tender platform specifically for public procurement in the construction sector. Tender packages are accompanied by the approved design-and-estimate documentation, technical specifications, drawings and work schedules that define the contractor's obligations. The ESSA reviewed two contracts used for school construction in 2026: (i) the standard Government works contract template; and (ii) Contract No. 264918 under the IsDB-financed Sustainable Rural Development Project for the construction of a modern inclusive school in the Republic of Karakalpakstan.

Standard Government works contract. The contract includes the following ES-related provisions:

- **ES legislation and regulatory requirements:**
  - The Contractor must carry out the works in accordance with the project documentation and applicable construction norms and rules of the Republic of Uzbekistan.
  - The Contractor must strictly comply with the approved design-and-estimate documentation.
  - For matters not specifically addressed in the contract, the provisions of applicable legislation apply.
- **ES specifications and requirements:**
  - The Contractor must implement the necessary technical-safety measures and is responsible for non-compliance by its employees, hired personnel and subcontractors.
  - The Contractor must protect the environment and existing green spaces and provide site lighting during construction.
  - The construction site and adjacent roads and sidewalks must be kept clean and orderly, and construction waste must be removed to the location specified by the Customer.
  - Appropriate sanitary conditions must be maintained at the construction site.
  - Materials, equipment, construction machinery and other property within the fenced construction area must be protected from the commencement of works until the completed facility is accepted by the Customer.
  - Upon completion, the Contractor must remove construction machinery, vehicles, equipment, materials, temporary buildings and other items from the site and clean the completed facility.
  - The Contractor must fulfil its obligations relating to workers, working conditions and wages in accordance with applicable regulatory requirements, provide appropriate working and rest conditions, and ensure the timely payment of wages.

- The Contractor must ensure that workers comply with safety, labour-protection and fire-safety requirements and take appropriate measures to prevent violations of technological and production discipline.

- **ES staffing:**
  - No staffing requirements from the Contractor side are specified.
- **Monitoring and reporting:**
  - Within ten days after receiving the site from the Customer/Client, the Contractor must install external surveillance cameras at its own expense.
  - The cameras must allow the construction works to be monitored from all sides and enable the Customer to monitor the site through the internet.

IsDB-financed school construction contract. This contract includes the following ES-related provisions:

- **ES legislation and regulatory requirements:**
  - The contract is governed by the laws of the Republic of Uzbekistan.
  - The Contractor must obtain and comply with all applicable permits, licences and approvals required for the works.
  - The contract refers to Cabinet of Ministers Resolution No. 177 of 24 June 2009 concerning compulsory insurance of employers' civil liability.
- **ES specifications and requirements:**
  - The Contractor's ES Management Strategies and Implementation Plans and worker Code of Conduct form part of the contract documents.
  - The Contractor may not commence mobilisation or construction until the Project Manager is satisfied that appropriate measures are in place to manage the relevant ES risks and impacts.
  - The Contractor must prepare and obtain the Project Manager's approval of a contractor environmental and social management plan (ESMP) before construction begins.
  - The Contractor ESMP must be reviewed and updated at least once every six months and whenever required to address changes in the works or identified risks.
  - The Contractor must implement the approved Contractor ESMP and comply with the ES obligations established in the contract.
  - The worker Code of Conduct addresses sexual harassment, GBV, SEA/SH, communicable diseases, illegal activities and criminal conduct.
  - Unexpected discoveries of historical interest or significant value must be reported to the Project Manager and managed in accordance with the Project Manager's instructions.
  - ES risks and impacts associated with proposed variations to the works must be considered before the variations are implemented.
- **ES staffing:**
  - The Contractor shall appoint environmental, social, and safety personnel at the site.
- **Monitoring and reporting:**
  - The Contractor must submit a monthly ES report providing information on contractor ESMP implementation, OHS performance, PPE, worker induction and training, safety inspections, worker accommodation, workforce composition, worker and community grievances, traffic incidents, dust, erosion, spills, waste management, vegetation protection and water protection.
  - The Contractor must promptly notify the Project Manager of serious incidents, including fatalities, serious injuries, significant property damage, pollution events and allegations involving GBV, SEA/SH, child abuse or other violations involving children.

- Detailed information on an incident must be submitted within the timeframe agreed with the Project Manager.
- The Project Manager may withhold the assessed cost of ES obligations that have not been implemented, overdue ES reports or corrective measures that have not been completed.

Overall, both contracts establish a legal and contractual basis for managing ES matters during construction, but their coverage differs substantially. The standard Government contract does not require monitoring by contractor ES personnel and regular ES reporting. The IsDB contract provides a stronger and more systematic framework through requirements for designated ES personnel, prior approval and implementation of a contractor ESMP, a worker Code of Conduct, incident notification, and ES performance reporting. However, neither contract expressly incorporates the positive SEE conclusion and its site-specific conditions.

For the RBP, the design and associated technical specifications governing contract implementation will also include the required ES provisions. A Standard ES Specification applicable for all RBP works has been prepared and given in **Annex 5**, which will be attached to the technical specifications contained in the design documentation for every RBP contract. These specifications include the standard mitigation measures for school construction, requirements for ES supervision and the submission of regular ES performance reports by the contractors.

3.3.5 Review of Construction Monitoring Practices

The ESSA reviewed the standard construction-monitoring checklist used by UCS for School No. 13 in Kitob District, Kashkadarya Region. The works involve expansion of the existing school through construction of a new building with capacity for 180 students within the existing school compound. The checklist records an inspection conducted on 22 July 2026.

UCS is primarily responsible for routine daily construction supervision. It uses a standard checklist and digital monitoring system to record construction progress, inspection findings, identified deficiencies and instructions issued to the Contractor.

The UCS technical-supervision inspector monitors the following aspects at the construction site:

- Site preparation, setting out and establishment of temporary facilities.
- Excavation, earthworks and foundation construction.
- Reinforcement, concrete, masonry and other structural works.
- Quality and conformity of construction materials, equipment and completed works with the approved design and technical specifications.
- Concealed works before they are covered by subsequent construction activities.
- Roofing, external finishes and internal finishing works.
- Installation of water supply, sewerage, heating, ventilation and other mechanical and utility systems.
- Installation of electrical and low-current systems.
- Quantities of completed works and their consistency with payment documentation.
- Construction progress against the approved schedule.
- Defects, deviations from the approved design and other technical deficiencies.
- Instructions issued to the Contractor and subsequent correction of identified deficiencies.

Overall, the reviewed records demonstrate that UCS has an established and operational system for daily technical supervision. However, the current monitoring system does not systematically track compliance with broader ES requirements under RBP, including OHS, community and child safety, waste management,

worker conduct, and incidents. These issues are generally addressed in response to specific situations as they arise rather than through a structured preventive monitoring approach. While the existing system provides a strong foundation for construction supervision, it should be strengthened by incorporating the ES monitoring requirements set out in the Standard ES Specifications in Annex 5. UCS inspectors should also receive training on these requirements to support their effective application during routine site inspections. Given the number and geographic dispersion of RBP-supported construction sites, additional construction supervision and ES monitoring support will also be provided through the IPF component, with professional supervision capacity covering each participating region.

3.3.6 Review of School Operation and Maintenance

Site visits to some schools and relevant consultations indicated that arrangements are in place for the routine operation and maintenance of WASH facilities. Schools have designated staff responsible for cleaning and maintaining toilets, handwashing facilities and associated areas. Service providers are available for solid-waste collection and disposal and for the periodic emptying of septic tanks and disposal of wastewater and sludge. Schools also receive an operation and maintenance budget covering general school maintenance, including WASH facilities, cleaning materials and minor repairs.

The principal operational concern identified during the site visits was inadequate or unreliable water supply at some schools. This affected toilet cleanliness, handwashing and overall hygiene conditions, even where sanitation facilities were available. The problem arose primarily because these schools were not connected to municipal water-supply networks and instead depended on water delivered by service providers. This arrangement did not provide a sufficiently reliable or continuous supply for effective operation of the WASH facilities.

The RBP designs include water-supply connections and associated WASH infrastructure for the new school buildings. These improvements are expected to address the water-supply constraints observed at the visited schools and support the effective operation and maintenance of the new facilities.

Overall, the existing staffing, service-provider and budget arrangements provide an adequate basis for maintaining the improved WASH facilities. However, before each school is commissioned, the availability and reliability of its water supply should be verified.

Management of e-waste. Consultations indicated that schools generally arrange for damaged ICT equipment to be repaired locally and transfer items that cannot be repaired to the relevant regional MOES office. Although commercial e-waste service providers are available, formal collection and recycling capacity remains limited, and the existing arrangements do not yet provide a consistent project-wide system for inventory control, secure storage, chain of custody, data destruction, recycling and final disposal. The ICT classrooms supported under the RBP will introduce computers, interactive displays, printers, network equipment, uninterruptible power supply units, voltage stabilizers, batteries, cables, toner cartridges and air-conditioning equipment that will eventually require replacement. Without appropriate controls, obsolete or damaged equipment could be stored indefinitely, transferred to informal collectors or disposed of with municipal waste, creating fire, pollution, occupational health and safety, and data-security risks. The e-waste management procedures to be followed for the RBP are given in **Annex 6**.

4 Stakeholder Engagement and Grievance Redress

4.1 Stakeholder Engagement during ESSA Preparation

4.1.1 Stakeholder Mapping

The stakeholders relevant to the RBP are identified based on their institutional mandates, roles in Project implementation, ability to influence ES performance, exposure to potential impacts, and expected benefits from the RBP. The key stakeholder groups are:

- **National institutions.** These include MOES, as the focal ministry responsible for overall Project coordination and education outcomes; MoEF, responsible for public investment planning, budgeting and financial coordination; the Ministry of Construction and Housing and Communal Services, responsible for construction standards and oversight; and the National Committee on Ecology and Climate Change, responsible for the EIA/SEE system and environmental compliance.
- **Regional and local implementing and oversight agencies**. These include regional governments, regional MOES departments, regional UCS, regional and district ecology authorities, urban-planning bodies, and school administrations. Their responsibilities include school selection, site and design review, procurement, contract management, construction supervision, environmental approval and inspection, commissioning, handover, and subsequent operation and maintenance.
- **Affected and beneficiary groups**. These comprise students, teachers, other school staff, families, neighbouring households and communities served by the participating schools. Students and teachers will be the principal users of the additional buildings, while families and communities will benefit from increased capacity, reduced overcrowding and more stable instructional time. These groups may also experience temporary construction disturbance, access restrictions and safety risks.
- **Groups requiring tailored engagement arrangements**. These include children, girls, children with disabilities, students from low-income households, families in rural or remote areas, women with caregiving responsibilities and, where relevant, persons facing language, mobility or other barriers to participation. Engagement with these groups should use accessible venues and formats, age-appropriate methods, separate discussions where appropriate, and arrangements that enable meaningful participation.
- **Community institutions and representatives.** Mahalla Citizens' Assemblies, parent representatives and other local community representatives provide an important link between schools, families and neighbouring communities. They can support information disclosure, identification of local site-use and access concerns, consultation with households, and communication of complaints. Engagement through mahallas should be complemented by direct engagement with groups that may otherwise be underrepresented.

4.1.2 Consultations Conducted during ESSA Preparation

The Project Team visited all 6 priority regions and dedicated ESSA mission and consultations were conducted between 13 and 28 July 2026 and 24 Aug 2026 through meetings, site visits, discussions with school administrations, families and mahalla representatives, and one online meeting. The consultations covered national institutions in Tashkent; regional and local institutions in Samarkand, Surkhandarya, Kashkadarya, Bukhara, and Karakalpakstan; and ten schools in Samarkand, Surkhandarya, Kashkadarya, and Karakalpakstan. Details of these consultations are given in **Annex 3**.

The consultations confirmed strong support for the proposed investments and the need to reduce overcrowding. Stakeholders also identified operationally important risks from construction in functioning schools, including access restrictions, construction-related hazards, dust, noise, and vehicle movements. The key findings of consultations are:

- **Need for the investments.** School administrations, families and regional authorities confirmed that overcrowding, enrolment growth and two-shift operation create a substantial need for additional school places. Families and school representatives expressed strong and widespread support for the proposed RBP activities.
- **Construction in operating schools**. Participating schools are expected to remain operational during construction. Dust, noise, vehicle movements, open excavations and temporary access restrictions could therefore affect students, teachers, neighbouring households and school activities.
- **WASH and utility conditions**. Some existing schools have limited privacy and hygiene conditions, rely on septic tanks, or lack a water supply connection.
- **Trees and existing site features.** Limited relocation or authorized removal of trees, including fruit trees, may be required at some schools. Ecology officials reported that district inspectors examine proposed sites before SEE approval and record trees, underground utilities and nearby houses.
- **Hazardous materials and waste**. Regional authorities reported that authorised waste-management, recycling and asbestos-management service providers are available.
- **EIA/SEE procedures**. Ecology authorities indicated that public consultation is undertaken as a matter of practice during the EIA studies, and confirmed that a positive SEE conclusion is required before construction. Whether a formal public hearing is required for a particular school is determined by the Ecology Committee under Resolution No. 234, as described in Section 3.1.1.

4.2 ESSA Disclosure and Consultation

The draft ESSA has been disclosed before Project appraisal on September 18, 2026. The updated draft will be disclosed in English on the AIIB website, accompanied by an executive summary in Uzbek. The translated summaries will also be made available through the MOES website, its participating regional departments and khokimiyats, and at participating schools and their respective Mahalla Citizens' Assemblies.

Consultations on the draft ESSA will be conducted with all relevant stakeholders. **Annex 3** will be updated based on the outcome of these consultations. The final ESSA will be redisclosed through the same channels before Board approval.

4.3 Grievance Redress

4.3.1 Existing Grievance Channels

The People's Reception system, established under Law No. ZRU-445, is the main grievance channel in the country. The system operates at national, regional and district levels and includes a Virtual Reception. MOES has adopted an internal procedure that defines admissibility criteria; allows appeals to be submitted in person, through the Virtual Reception, hotline, website or email; establishes an Appeals Department; and requires appeals to be registered, categorised and tracked within defined timelines.

Other available grievance channels include:

- **Regional and local grievances.** Khokimiyats operate their own reception offices through which communities may raise concerns relating to regional and local government activities.
- **Worker grievances.** Workers may submit labour-related complaints to the Labour Inspectorate, in addition to any workplace grievance mechanism established by their employer.
- **Procurement complaints.** Under Article 75 of the Law on Public Procurement, complaints may be submitted through the designated procurement-review arrangements and to the Chamber of Accounts, General Prosecutor's Office, Anti-Corruption Agency, MoEF and the competent competition authority.

Appeals are generally considered within 15 days and may be extended to one month where additional review is required. A refusal or decision may be challenged before a higher authority or a court. Submission of an appeal is free of charge.

4.3.2 Assessment of Adequacy

The availability of multiple national, regional, local, labour and procurement grievance channels is a strength of the existing system. MOES's procedures also provide a basis for registering, assigning, tracking and responding to appeals. However, the following limitations are operationally relevant to the RBP:

- **Child-accessible channels.** No grievance channel or procedure specifically adapted for use by children was identified, although the law recognises the independent right of minors to submit appeals. This is a material gap because construction will take place within operating schools.
- **Anonymous and confidential complaints.** Anonymous appeals are excluded by law. Therefore, the practical objective for the RBP should be confidential receipt and handling of complaints by designated officers, with personal information disclosed only where necessary.
- **Sensitive complaints.** No written protocol was identified for confidential and survivor-centred handling of complaints involving sexual exploitation, abuse or sexual harassment, including safe referral to appropriate support services.
- **Accessibility and protection.** The physical accessibility of grievance channels, the ability to submit complaints in Karakalpak, and measures protecting complainants against retaliation have not been verified.
- **Project-level tracking and reporting**. Complaints are registered and tracked by individual institutions, but grievances relating to specific project-supported schools are not identified, consolidated or reported at the project level. Consequently, recurring or systemic issues cannot be readily detected, and timely acknowledgement, resolution and feedback cannot be demonstrated across the RBP.

These limitations do not require a separate grievance system. They require the existing channels to be adapted so that RBP-related complaints can be safely received, identified, escalated, consolidated and reported.

4.3.3 Recommendations

An Action Plan is proposed to strengthen the existing grievance system and is specified in Section 5.2. It will include

- establishment of a project-level grievance register or tagging system to identify complaints relating to RBP-supported schools;
- semi-annual consolidation and reporting of grievance numbers, categories, resolution status and response times, without disclosing personal or sensitive information;

- adoption of a written protocol for confidential and survivor-centred handling of sensitive complaints, including safe referral pathways;
- establishment of accessible and age-appropriate arrangements through which students can safely raise construction-safety, worker-conduct or other concerns;
- confirmation of accessible submission arrangements in Uzbek and Karakalpak, together with protection against retaliation; and
- disclosure of available grievance channels, contact details and escalation procedures at each participating school and Mahalla Citizens' Assembly before construction begins.

4.3.4 The Project Affected People's Mechanism

AIIB's Policy on the Project-affected People's Mechanism (PPM) applies to this RBP. The PPM has been established by AIIB to provide an opportunity for an independent and impartial review of submissions from Project-affected People who believe they have been or are likely to be adversely affected by AIIB's failure to implement the Environmental and Social Policy in situations when their concerns cannot be addressed satisfactorily through the GRM or the processes of AIIB's Management. Information on this mechanism will be disclosed in Uzbek and Karakalpak and displayed at each participating school and its respective Mahalla Citizens' Assembly with the following links.

- https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/how-we-assist-you/index.html; and
- https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/submission/index.html

5 Recommendations and Actions

5.1 Conclusions of ESSA

The ESSA concludes that Uzbekistan's legal, regulatory and institutional framework is generally adequate for managing the ES effects of the RBP. The framework establishes requirements for environmental assessment and approval, construction and occupational safety, design review, technical supervision, accessibility, public consultation and grievance redress. However, gaps remain in operational performance, particularly in the consistent application of ES requirements across multiple construction sites, preventive supervision, ES reporting, contractor oversight, and grievance tracking.

The RBP has been designed to promote sustainable, inclusive and energy-efficient school infrastructure. Relevant DLIs require the application of energy-efficiency, accessibility and sustainability considerations in school design and delivery. Detailed engineering designs and site-specific EIA studies are also included under the DLI framework, helping ensure that ES requirements are considered before works are tendered and commenced.

The overall ES risk of the RBP is assessed as Moderate. Schools generally have adequate land for the proposed additional buildings, with approximately 82 percent of the combined school area remaining as open or unbuilt space. The anticipated adverse effects are generally site-specific, temporary, predictable and manageable through established design, approval, contractual and supervision measures. Activities with potentially significant or unmanageable impacts will be excluded in accordance with the eligibility boundaries and ES exclusion criteria set out in Section 2.3 and Annex 1.

Based on the identified operational gaps, the ESSA proposes a set of targeted Action Plan (AP) measures. These recommendations have been incorporated into the RBP Action Plan, with defined institutional responsibilities, implementation timelines and completion indicators. The ES actions have been discussed with and agreed by MOES.

The RBP also includes an IPF component for project management support and institutional capacity strengthening, particularly for construction supervision, on-site OHS oversight and ES risk management. Using loan proceeds, MOES will engage a project management consulting firm and ES monitoring consultants, with professional teams deployed in each priority region. The engagement and deployment of construction supervision and ES monitoring support has been incorporated into the RBP Action Plan to ensure adequate ES/OHS monitoring capacity across the participating regions throughout implementation.

5.2 ES Actions in the RBP AP

The proposed ES actions to be included in the RBP AP are presented in **Table 5.1** and described below. Actions 1–4 align with the measures agreed under the World Bank-supported BILIM Program Action Plan, while Actions 5–7 address RBP-specific implementation needs for school works contracts, UCS inspector capacity and ES monitoring reports. **Table 5.1** also includes three DLIs (1.1, 2.1 and 3.4) to show how energy efficiency, environmental assessment, inclusion and equity are integrated into the results framework. These DLIs are included in the table to demonstrate the overall integration of ES considerations into the RBP and do not constitute additional ES actions.

1. **ES staffing at national and regional levels.** MOES has already engaged an environmental consultant to support preparation of the RBP. MOES shall also engage a qualified social consultant and designate ES focal points in each participating regional office. The ES consultants will support project implementation, monitoring, and reporting. The regional ES focal points will coordinate with the ES consultants and relevant local authorities to implement and monitor the Action Plan.

2. **Inclusive stakeholder engagement.** Public consultation is primarily undertaken as part of EIA/SEE preparation. Mahallas and regional authorities also provide established channels (e.g., Telegram) for sharing information with local communities. This action extends stakeholder engagement throughout project implementation and requires specific attention to women, persons with disabilities and other vulnerable groups.
3. **Strengthening the existing grievance mechanism.** MOES and other government institutions already use national grievance mechanisms. This action requires MOES to identify, tag or extract grievances relating to AIIB-financed schools, consolidate them in a project-level database, track their resolution and report recurring issues.
4. **Confidential reporting for sensitive complaints.** Existing grievance channels need to be strengthened for SEA/SH and other sensitive complaints. The project will establish confidential handling procedures, a mechanism for receiving anonymous or unsigned reports for safeguarding follow-up, designated focal points (coordinate closely with the Deputy *Khokim* in charge of women's affairs and, at the mahalla level, with the Rais's assistant responsible for women's issues) and documented referral pathways to appropriate health, psychosocial, legal and other support services.
5. **Standard ES Specifications for school works**. A common set of standard ES Specifications shall be adopted and applied to all RBP school works. These Specifications, which are given in **Annex 5**, will be incorporated into the design documents and technical specifications used for tendering and contracting. The costs of implementing the ES requirements shall be covered through a dedicated allocation under the BOQ contingency amount. These specifications will cover:

    a. Deployment of one qualified environmental, health and safety inspector at each active school construction site.

    b. Implementation of standard mitigation and management measures relevant to school construction, including OHS, community and child safety, continuity of school operations, traffic management, dust, noise, waste, wastewater, hazardous materials, asbestos, emergency preparedness and response, worker Codes of Conduct, and incident notification and investigation.

    c. Submission of monthly contractor ES performance reports.

6. **Capacity building for UCS inspectors.** UCS inspectors are qualified professionals who provide daily supervision of construction quality and safety. This action will strengthen their understanding of the additional ES requirements applicable to the RBP. MOES's ES consultants will deliver a half-day training session for UCS inspectors in each participating region. The training will cover good international industry practice for managing ES risks, monitoring implementation of the ESMP, contractor ES performance, OHS, and preventing SEA/SH/GBV. Incident reporting and monthly ES reporting.

7. **Construction supervision and ES monitoring capacity.** Given the number and geographic dispersion of RBP-supported school construction sites, additional supervision capacity will be provided through the IPF component. MOES will engage a construction supervision consulting Firm (CSC), which will deploy qualified environmental, health and safety, and social specialists in each participating region to support supervision and monitoring of RBP-supported construction works throughout construction.

8. **Semi-annual ES monitoring reports.** MOES will prepare semi-annual ES monitoring reports covering the environmental, social and OHS performance of the RBP. The reports will enable MOES

and AIIB to track implementation of the Action Plan and standard ESMP, contractor performance, incidents, grievances, stakeholder engagement, training, non-compliance and corrective actions.

9. **Energy-efficiency and green-building requirements for school infrastructure under DLI 1.1**. MOES, in coordination with the MOCHS and other relevant authorities, will ensure that the Energy Efficiency Decree and related implementation guidelines are applied to RBP-supported school infrastructure. This action will confirm that green-building and energy-efficiency requirements are reflected in school design, review, approval and implementation arrangements.
10. **ES screening and EIA documentation for all schools under DLI 2.1**. MOES, through the Design/ EIA consultants, will ensure that ES screening is completed for all RBP-supported schools as part of the EIA documentation. The screening will confirm eligibility; assess land legal status and current land use, including any informal use; identify site-specific ES risks and mitigation measures; verify compliance with the RBP exclusion criteria; and support approval of the EIA/ZVOS and SEE documentation before works are tendered or commenced.
11. **Inclusion and gender standards in targeted schools under DLI 3.3**. MOES, regional MOES departments and participating schools will ensure that the agreed inclusion and gender standards are applied and verified in targeted schools, including functional gender-segregated toilets, accessible routes and facilities for children with disabilities, and applicable inclusive learning materials

Table 5.1: Proposed ES Actions and Measures

No.	Identified Gaps	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type
1	Limited dedicated ES staffing at MOES national and regional levels.	MOES shall (i) engage qualified environmental and social consultants in the Program Management Office and (ii) designate ES focal points in each participating regional office.	MOES/PCO and participating regional MOES offices	Within three months of RBP effectiveness and maintained throughout implementation	• The Terms of Reference for ES consultants and focal points have been approved. • The existing environmental consultant is formally and full time assigned to implement RBP AP. • A qualified one social consultant is engaged. • ES focal points (one environmental and one social) are formally designated in all participating regional MOES offices. • The consultants and focal points remain in place throughout implementation. •	AP
2	Stakeholder engagement during implementation does not consistently include women, persons with disabilities and other vulnerable groups.	Strengthen inclusive stakeholder engagement practices at the local level, with attention to women, persons with disabilities, and other vulnerable groups during planning and implementation.	MOES/PCO ES consultants and Regional Focal Points, in coordination with local authorities (khokimiyats) and the education department	Ongoing; first consultation and disclosure before works start at each school	• Planned works, schedule, expected disturbance and grievance channels are disclosed at the school and mahalla before work starts. • At least one consultation is held before work starts and one during implementation at covered schools. • Consultation and disclosure records show participation of women, persons with disabilities and other vulnerable groups.	AP
3	Project-related grievances received through existing	Strengthen project-level tracking, consolidation, and reporting of grievances	MOES/PCO ES consultants and regional Focal	Ongoing; project tagging/register and reporting	• A project-specific grievance database or tagging system is	AP

No.	Identified Gaps	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type
	government channels are not consolidated or reported at the Project level, making them difficult to identify and track.	received through existing grievance mechanisms to ensure timely resolution and feedback.	Points in coordination with relevant government authorities	arrangements established within three months of RBP effectiveness	established using existing grievance channels. • Grievances concerning RBP schools are extracted or reported from relevant government channels and entered into the project database. • Semi-annual consolidated reports present grievances received, resolved, outstanding and recurring issues.	
4	Existing grievance mechanisms do not provide a clear, confidential and anonymous reporting and referral process for SEA/SH and other sensitive complaints.	Formalize confidential reporting and referral pathways for sensitive complaints, including GBV/SEA/SH.	MOES/PCO, participating regional MOES offices, khokimiyats, school administrations and contractors	Within six months of RBP effectiveness and before works start at any occupied school	• A written protocol for confidential and survivor-centered handling of sensitive complaints is adopted and integrated into the project grievance arrangements. • Referral pathways to available health, psychosocial, legal and other support services are documented for all participating regions. • Relevant MOES, regional, school, and contractor personnel are informed of and trained in the protocol and referral process.	AP
5	School works contracts do not consistently include standalone ES specifications, contractors' ES staffing at site, or regular contractor ES reporting.	Apply standard ES Specifications for all AIIB-financed school works. The specifications shall be included in design documents intended for tendering. They shall require:	MOES/PCO with design institutes/consultants	Before the issue of the first RBP works tender and applied to all subsequent works packages	• The standard ES Specifications and the standard mitigation measures for school construction have been finalised and adopted by MOES. • The adopted ES Specifications are included in all RBP school designs and will be part of the tender documents.	AP

No.	Identified Gaps	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type
		(iv) deployment of one qualified ES inspector at each active school construction site, (v) implementation of the standard mitigation measures, and (vi) monthly contractor ES reporting.			• Each contractor designates a qualified ES inspector for every active school site. • Monthly contractor ES reports are submitted using the approved format.	
6	UCS inspectors may not be aware of all ES requirements applicable to the RBP.	Implement an ES training program for UCS inspectors in each participating region.	MOES/PCO ES consultants	Before or at the start of works in each participating region; refresher training every six months	• A common training presentation, handout and evaluation checklist are prepared. • A training schedule covering all six regions is approved. • At least one half-day training session is delivered to UCS inspectors in each participating region. • Attendance records and training materials are maintained.	AP
7	Limited capacity for consistent construction-stage ES and OHS supervision across multiple geographically dispersed school construction sites.	Engage construction supervision and ES monitoring consultants (CSC) under the IPF component, with professional ES/OHS capacity covering each participating region.	MOES/PCO	Before commencement of RBP-supported construction works and maintained throughout construction.	• Construction supervision and ES monitoring consultants engaged; • CSC contract includes environmental, health and safety, and social supervision requirements. • Qualified environmental, health and safety, and social specialists are deployed and maintained in each participating region before commencement of works. • Supervision findings, non-compliances and corrective actions are documented and reported	AP

No.	Identified Gaps	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type
					through the Project's ES monitoring arrangements.	
8	MOES does not currently prepare any report on ES performance of ongoing school construction activities.	Prepare and submit semi-annual ES monitoring reports covering environmental, social and OHS performance of the RBP.	MOES/PCO ES consultants	Every six months	• A standard semi-annual ES monitoring report template is approved. • Reports cover all participating regions and active AIIB-financed school construction sites. • Reports summarise implementation of each applicable Action Plan item. • Reports include contractor performance, incidents, grievances, consultations, training, non-compliance, and corrective-action status. • Reports are submitted to AIIB within the agreed reporting period.	AP
9	Energy-efficiency and green-building requirements need to be consistently applied in school infrastructure design, approval and implementation	Apply the Energy Efficiency Decree and related implementation guidelines to all RBP-supported school infrastructure.	MOES in coordination with the Ministry of Construction	One-time DLI, in accordance with the agreed DLI schedule.	• The Decree is officially published, in force, and implementation guidelines applicable to school infrastructure are issued and circulated, as verified through official government documents and circulars.	DLI 1.1
10	ES screening and EIA documentation must be completed for all RBP-supported schools to confirm eligibility, identify site-specific risks and support informed	Complete ES screening for all RBP-supported schools as part of the EIA documentation. The screening shall verify compliance with the RBP exclusion criteria; assess land legal status and	MOES/PCO, regional MOES departments with design institutes/ consultants	Phased throughout implementation in accordance with the DLI/DLR schedule	• Achievement is verified through the applicable milestones, including approval of the detailed engineering design and ZVOS/EIA documentation; procurement and contract-award records; completion, handover and commissioning certificates; and	DLI 2.1

No.	Identified Gaps	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type
	decision-making under DLI 2.1.	current land use, including any informal use; identify site-specific ES risks and mitigation measures; and support approval of the EIA/ZVOS documentation before works are tendered or commenced.			checklists confirming functional WASH, energy-efficiency and solar-energy systems.	
11	Inclusive and equitable access to education facilities and services, particularly for girls and children with disabilities.	Ensure that the agreed percentage or number of targeted schools meets defined inclusion and gender standards.	MOES/PCO, regional MOES departments	In accordance with the annual targets and final DLI verification protocol	• The agreed percentage or number of targeted schools has functional gender-segregated toilets, accessible routes and facilities for children with disabilities, and applicable inclusive learning materials, as verified through facility audits, accessibility checklists and school documentation.	DLI 3.3

5.3 RBP Implementation Support and Monitoring

5.3.1 The Client's Role

MOES, as the RBP implementing agency, is responsible for implementing the RBP, monitoring implementation progress, evaluating the indicators and fulfilling the relevant commitments under the legal documents, including the RBP Action Plan. These responsibilities include maintaining effective ES management systems, implementing monitoring arrangements and identifying and addressing implementation issues in a timely and effective manner. During RBP implementation, MOES, in coordination with MoEF and relevant regional agencies, will:

- Implement the agreed ES actions and maintain adequate ES staffing and institutional capacity.
- Incorporate the agreed ES procedures into the project operational manual, designs, bidding documents and contracts.
- Monitor ES performance, including EIA and SEE compliance, construction supervision, OHS, grievances, incidents and corrective actions.
- Submit semi-annual ES monitoring reports to AIIB.
- Consult AIIB before making any material changes to the RBP scope or the ES systems assessed by the ESSA.

5.3.2 The Bank's Role

AIIB will work with MOES and MoEF to provide implementation support for the ES aspects of the RBP. This support will include:

- Disclosing the final ESSA and any subsequent updates on the AIIB website.
- Reviewing progress in implementing the agreed ES actions and achieving the relevant DLIs.
- Monitoring the performance of the applicable ES systems and any changes in the RBP's ES risks.
- Supporting MOES and MoEF in addressing implementation challenges and strengthening institutional capacity.
- Agreeing with MOES and MoEF on any additional measures required to address emerging or unanticipated ES risks.

Annex 1: Indicative Matrix to Define RBP and Screen ES Effects

Areas in Govt's programs	Activities in Govt's programs	Relevance to Key RBP Result Areas	Potential ES Effects (Risks, impacts and benefits)	ES Categorisation	Conclusion	Justification
1. Salaries and education-service expenditure	Regular salaries for teachers, school administrators and other staff; teacher and school-administrator training and professional development; curriculum development, revision and implementation; and related teaching and training expenses.	Partly relevant. RA1/ DLI1.2 (extracurricular curriculum) RA3/DLI3.3 (teacher STEM training)	Impacts and risks • Women, rural teachers, teachers with disabilities or staff with limited connectivity may have unequal access to training • Online content and connected learning may create child online-safety, privacy, cybersecurity and digital-divide risks Benefits • Improved teaching quality, curriculum relevance, extracurricular learning and teacher competence • Opportunity to strengthen inclusive pedagogy, digital literacy, child safeguarding and safe use of STEM/ICT facilities • Potentially wider and more equitable access to quality teaching and learning materials	Category C	Partly Include in the RBP	Regular salaries should be part of the routine government budget and hence not included in the RBP.
2. Preschool education capital investment (children below school age)	Construction of new preschools; reconstruction, expansion and modernization; capital renovation and major repairs; purchase and installation of equipment and supplies; and associated design and investigation work.	Not relevant RBP RAs.	Impacts and risks • Typical construction risks involving land, dust, noise, traffic, waste, OHS and community safety • Heightened child-safety, safeguarding, accessibility, sanitation and emergency-egress requirements for very young children Benefits • Expanded access to early childhood education and improved learning, WASH, safety and accessibility conditions • Potential benefits for school readiness, caregivers and women's participation in work or education	Category B	Exclude from the RBP	Preschool investments do not contribute to the RBP Project Development Objective. Some activities might have significant adverse impacts depending on site and scale.

Areas in Govt's programs	Activities in Govt's programs	Relevance to Key RBP Result Areas	Potential ES Effects (Risks, impacts and benefits)	ES Categorisation	Conclusion	Justification
3. General secondary-school capital investment (Grades 1- 11)	Construction of entirely new schools Establishment and construction of new general secondary schools, including associated site development, utilities, access and equipment.	Not relevant to RBP RAs.	Impacts and risks • Greenfield site selection and land acquisition may cause physical or economic displacement and loss of land or resource access • Potential effects on natural habitats, cultural resources, drainage, traffic and community services • Construction-related labor, OHS, community safety, and pollution risks Benefits • Additional school capacity, improved geographic access and reduced overcrowding or double-shift operation • Opportunity to provide safe, accessible, green and climate-resilient facilities from the outset	Category B	Exclude from the RBP	May require land acquisition and resettlement. Depending on their location and scale, construction of new schools may have significant adverse impacts.
	Reconstruction, including expansion of new schools Reconstruction of existing general secondary schools; construction of additional teaching blocks; expansion and modernization; and the associated site, utility, equipment, testing, commissioning and handover activities required to make the added capacity operational.	RA2/DLi2.1 (expansion of new schools) RA2/DLI2.2 (additional school seats) RA3/DLI3.1 (reduce double-shift schools)	Impacts and risks • Dust, noise, vibration, traffic, excavation, runoff, waste, spills and disruption of ongoing school operations • Worker OHS and labor risks; community and child safety; SEA/SH and worker-behaviour risks • Potential cutting of trees • Reconstruction works for ICT rooms may generate construction debris, including minor quantities of asbestos waste Benefits • Expanded usable capacity, reduced overcrowding and improved prospects for sustained single-shift schooling • Safer, accessible, energy-efficient and climate-resilient learning spaces with improved WASH and learning facilities • Improved access, dignity and participation for girls and children with disabilities	Category B	Include in the RBP	The proposed schools are expansions within existing school buildings without any land-related issues.
	Capital renovation and major repairs Capital renovation and major repairs, including roofs, windows, doors, painting and building services.	Not relevant to RBP RAs.	Impacts and risks • Dust, noise, work at height, electrical risks, school disruption, worker OHS and child/community safety • Construction and demolition waste, including hazardous materials with asbestos-containing materials Benefits	Category B	Exclude from the RBP	Capital renovation may involve generation of significant hazardous waste, such as asbestos

Areas in Govt's programs	Activities in Govt's programs	Relevance to Key RBP Result Areas	Potential ES Effects (Risks, impacts and benefits)	ES Categorisation	Conclusion	Justification
			• Improved weather protection, thermal comfort, energy efficiency, appearance, safety and serviceability of existing buildings • Potential extension of building life and reduced operating or repair costs			
4. Green, energy-efficient and WASH infrastructure	Energy-efficient materials and insulation; solar PV and solar water-heating systems; efficient heating and lighting; climate-resilient design; WASH, drinking-water and wastewater facilities; and measures to make schools safe and environmentally sustainable.	RA1/DLI1.1 (energy-efficiency standards) RA2/DLI 2.1 and 2.2 (new schools and seats) RA3/DLI3.3 (inclusion and equity)	Impacts and risks • Electrical, fire, work-at-height and maintenance risks associated with solar and energy systems • Lifecycle waste from panels, inverters, batteries, lamps, insulation and ICT/electrical equipment • Public-health impacts from poor maintenance of WASH facilities Benefits • Reduced energy and water use, operating costs and greenhouse-gas emissions • Improved thermal comfort, ventilation, lighting, hygiene, privacy, menstrual-health conditions and climate resilience • More reliable, accessible and dignified WASH services	Category B	Include in the RBP	Significant ES benefits from improved comfort and equity
5. Creative and subject-specialized schools for gifted students – capital investments	New construction; reconstruction and expansion; capital renovation and major repairs for creative schools and subject-specialized schools that provide advanced education to gifted students.	Not relevant to RBP RAs.	Impacts and risks • Typical land, construction, OHS, community safety, pollution, waste and operational risks • Selective admission and geographic concentration may create or reinforce socioeconomic, gender, disability, language or rural-urban inequities Benefits • Expanded advanced learning opportunities for academically or creatively gifted students	Category B	Exclude from the RBP	These activities target only a limited percentage of school students

Annex 2: ES Regulations Relevant to RBP

#	Name of Law / Policy / Act	Relevant Provisions	Relevance for RBP ES Management	Actions Taken or to Be Taken by Implementing Agencies
A	**General / Cross-Cutting**			
1	Constitution of the Republic of Uzbekistan (new edition adopted by referendum, 30 April 2023)	Guarantees rights to a favourable environment, health, safe work, education, information, participation and appeal; protects equality, cultural heritage and the rights of persons with disabilities and other vulnerable groups.	Provides the overarching legal basis for environmental protection, worker and community safety, accessibility, non-discrimination, consultation, disclosure and grievance redress.	MOES will ensure that school selection, design, consultation and implementation protect these rights. Program information and grievance channels will be accessible to students, parents, workers and communities.
2	Law on Nature Protection (9 December 1992, as amended)	Establishes the framework for environmental protection, sustainable use of natural resources and prevention or mitigation of pollution and environmental damage.	Applies to dust, noise, wastewater, waste, vegetation removal and other impacts associated with school construction and rehabilitation.	The Design/EIA consultant will incorporate environmental requirements into designs and EIA documentation. MOES will include them in procurement documents, and UCS will supervise compliance.
B	**EIA/SEE-Related**			
3	Law No. ZRU-1036 on Environmental Expertise, Environmental Impact Assessment and Strategic Environmental Assessment (24 February 2025; effective 25 August 2025)	Replaces the former Law on Ecological Expertise. Requires EIA materials and a positive SEE conclusion before financing and implementation. Article 17 requires the initiator to conduct public hearings before SEE; the applicable procedure is determined under the implementing resolution. The conclusion on EIA materials is valid for three years. Article 24 requires the initiator to report implementation of SEE conditions after every quarter, no later than the 25th day of the following month.	This is the principal current law governing EIA and SEE for proposed school works. It links environmental approval to financing and implementation and creates continuing compliance and reporting obligations for the project initiator.	For every school, the Design/EIA consultant will complete screening, site inspection and Environmental Impact Statement (ZVOS) documentation and obtain the Ecology Committee's decision on whether a public hearing is required. MOES will obtain a positive SEE conclusion before financing or works, incorporate its conditions into the design, BOQ and contract, and submit the quarterly compliance information as per Article 24. UCS will maintain the evidence needed for those submissions.
4	Cabinet of Ministers Resolution No. 541 of 7 September 2020, On Further Improvement of the Environmental Impact Assessment Mechanism; and	Resolution No. 541 remains in force through 13 August 2026. Resolution No. 234 enters into force on 14 August 2026 and replaces it with a three-category	Determines the applicable screening category, EIA documentation, competent reviewing authority and procedural sequence for individual school subprojects.	Submissions made through 13 August 2026 will follow Resolution No. 541. Submissions on or after 14 August 2026 will follow Resolution

#	Name of Law / Policy / Act	Relevant Provisions	Relevance for RBP ES Management	Actions Taken or to Be Taken by Implementing Agencies
	Resolution No. 234 of 11 May 2026, On Measures to Introduce New Mechanisms for Environmental Impact Assessment	system. Item 214 expressly places educational institutions in Category III, with a 15-working-day review period. Where a submission includes activities of different categories on the same site, the highest category governs. Under Resolution No. 234, the SEE Center decides whether a public hearing is required by considering the object's location, probable significant adverse-impact zones and the level of environmental pollution.	The regulatory transition falls within the expected Program preparation and implementation period.	No. 234. Because RBP works are expected to begin in 2027, the Program will screen ordinary school works as Category III under item 214, document any ancillary activity that could elevate the category, use qualified EIA preparers and follow the SEE Center's site-specific hearing decision.
C	**Pollution-Related**			
5	Law on Protection of Atmospheric Air (27 December 1996, as amended)	Regulates protection of ambient air, establishes requirements for controlling pollutant emissions and requires measures to prevent harmful impacts from stationary and mobile sources.	Relevant to dust and exhaust emissions from demolition, excavation, material handling, stockpiles, construction machinery, trucks and backup generators.	The Design/EIA consultant will include proportionate dust and emission controls in the EIA. Contractors will implement dust suppression measures. PM2.5 monitoring or fixed sprinklers will be installed where required by the SEE conclusion or justified by site risk. UCS will verify controls and corrective action.
6	Water Code of the Republic of Uzbekistan, approved by Law No. ZRU-1076 of 30 July 2025 (effective 31 October 2025)	Replaces the former Law on Water and Water Use. Regulates rational water use and the protection of surface water and groundwater; controls abstraction, use, and discharge; and prohibits pollution, contamination, and depletion of water bodies.	Applies to construction water supply, sanitation, dewatering, concrete washout, stormwater runoff, wastewater discharge and protection of nearby canals, drains and groundwater.	School designs will identify lawful water sources and wastewater arrangements; prohibit untreated discharge; provide sanitary facilities and controlled concrete washout; protect drainage paths; and require permits or approvals where applicable.
7	Law on Waste (No. 362-II, 5 April 2002, as amended, most recently by Law No. ZRU-1109 of 20 December 2025); Cabinet Resolution No. 266 of 21 September 2011 on collection and disposal of used mercury-containing lamps; Cabinet Resolution No. 295 of 27 October 2014 on state accounting and control of waste operations	Requires waste minimization and safe collection, storage, transport, recycling and disposal, including specific controls for hazardous waste and spent mercury-containing lamps.	Applies to construction and demolition waste, domestic waste, laboratory chemicals, lamps, batteries, solar equipment and e-waste.	The Design/EIA consultant will identify waste streams and authorised management options. MOES will include waste requirements in contracts; Contractors will engage licensed service providers; and UCS will verify records and use of licensed providers.

#	Name of Law / Policy / Act	Relevant Provisions	Relevance for RBP ES Management	Actions Taken or to Be Taken by Implementing Agencies
8	Sanitary Rules and Norms No. 0158-04 (12 July 2004) on the collection, transportation and disposal of asbestos-containing waste in the conditions of Uzbekistan, and related occupational sanitary requirements for asbestos-containing materials	Requires identification and classification of asbestos-containing waste (Hazard Classes 3 and 4 under SanPiN No. 0128-02); minimization of fibre release; wet methods and controlled handling; sealed, labelled packaging; designated temporary storage; worker protection; documented transport; waste passports; and disposal at authorised landfill sites for solid municipal and non-recyclable industrial waste, under sanitary supervision by territorial Sanitary-Epidemiological Centres.	This is only relevant where rehabilitation or demolition may disturb asbestos-cement roofing sheets, pipes, insulation, or other asbestos-containing materials in older schools—a common condition in Soviet-era school buildings across Uzbekistan. See the dedicated Asbestos Waste Management review below for a fuller assessment of current practice and specific recommendations for improvement.	The design consultant will conduct or arrange a pre-demolition/pre-rehabilitation asbestos survey for every school where asbestos-containing materials may be present, and identify authorised service providers. Suspected material will not be disturbed until assessed. Contractors will use a site-specific asbestos management method, exclusion zones, trained workers, respiratory protection and PPE, wet removal, sealed labelling, secure storage, waste passports, and authorised transport and disposal. Students and staff will remain outside the controlled area.
9	Law on Environmental Control (27 December 2013)	Establishes state, departmental, production and public environmental control to monitor compliance and address violations.	Provides the basis for environmental inspections, monitoring, documentation and corrective action.	MOES will maintain Program-level monitoring and reporting. UCS will inspect and document site compliance and follow up on corrective actions; environmental authorities may inspect and enforce legal requirements.
D	**Trees**			
10	Law on Protected Natural Areas No. 710-II (3 December 2004); Law on Protection and Use of Wildlife No. 545-I (26 December 1997), in the new edition approved by Law No. ZRU-408 of 19 September 2016; Law on Protection and Use of Vegetation No. 543-I (26 December 1997), in the new edition approved by Law No. ZRU-409 of 21 September 2016	Protect protected areas, natural habitats, vegetation, and wildlife; regulate use, removal, and restoration; and prohibit unauthorized damage to protected species, habitats, and natural assets.	Most school works are expected within existing developed footprints, but these laws apply where sites contain mature trees, natural vegetation, protected areas or wildlife habitat.	The Design/EIA consultant will inspect each site and record protected-area, habitat, tree and vegetation constraints in the EIA. Any removal, relocation, compensation payment or replacement planting will follow the applicable permit and the individual SEE conclusion.
11	Presidential Decree No. UP-46 of 30 December 2021, “On Measures to Accelerate Greening Activities and Further Effectively Organize Tree Protection in the Republic” (as	Establishes an indefinite moratorium on felling valuable tree and shrub species outside the State Forest Fund and prohibits government and local-authority decisions authorizing their removal or	RBP school expansion may affect trees within existing school compounds. The requirements apply to site screening, design and EIA/SEE preparation, construction supervision, commissioning,	The Design/EIA will identify existing trees, confirm their legal status with the regional environmental authority, avoid impacts on valuable species, and ensure 25% remains

#	Name of Law / Policy / Act	Relevant Provisions	Relevance for RBP ES Management	Actions Taken or to Be Taken by Implementing Agencies
	amended), read with Presidential Decrees Nos. UP-5863 and UP-6155	damage. Lawfully exempted removal remains subject to authorization and compensatory planting requirements of a 1:10 ratio. New buildings exceeding 12 m in height or 500 m² in total area must allocate at least 25 percent of the project land plot for greening. Unauthorized cutting is subject to a 1:100 replacement requirement, three years of maintenance, and applicable financial penalties.	and subsequent maintenance. The proposed standard school buildings exceed the 500 m² threshold; therefore, the 25 percent greening requirement applies.	available for greening purposes. UCS will supervise compliance during construction.
E	**Land**			
12	Land Code (30 April 1998, as amended); Law No. ZRU-781 on Procedures for Withdrawal of Land Plots for Public Needs with Compensation (29 June 2022)	Regulates land rights and allocation, and establishes procedures for land withdrawal, consultation, compensation, and dispute resolution.	Relevant to confirming school ownership, boundaries, encumbrances, informal use and avoidance of land acquisition or displacement.	MOES, the Design/EIA consultant, and the Cadastre Agency will verify legal ownership, boundaries, and actual use before site approval. Schools involving land acquisition or displacement will be excluded, and UCS will ensure works remain within approved boundaries.
13	Law on Protection and Use of Cultural Heritage Objects (30 August 2001, as amended); Law on Protection and Use of Archaeological Heritage Objects (13 October 2009)	Protects cultural and archaeological heritage, regulates works in protected zones, and requires authorization and preservation procedures.	Relevant to schools near heritage sites and to archaeological discoveries during excavation.	Site screening will identify heritage constraints, and MOES will obtain required approvals. Procurement documents will include a standard chance-find procedure supervised by UCS.
F	**Construction Norms**			
14	Urban Planning Code (22 February 2021, Law No. ZRU-676) and applicable construction norms, seismic standards and accessibility requirements	Regulate planning, design review, permitting, construction quality, structural and seismic safety, fire safety, engineering services, accessibility and commissioning.	Directly applicable to safe, resilient and accessible school design and construction, including WASH, utilities, ventilation and emergency egress.	The Design/EIA consultant will prepare code-compliant designs and obtain required reviews. UCS will supervise construction; GASN and relevant utility and fire authorities will perform statutory checks and participate in commissioning.
15	Cabinet of Ministers Resolution No. 321 of 20 May 2021 on customer services and the procedures for authorship control, technical supervision and control measurement in construction	Requires authorship and technical supervision throughout construction. Under clauses 12-14, technical supervision is performed by a certified specialist permanently employed or contractually engaged by the customer	Establishes the national construction-supervision structure for participating school works and provides an important mechanism for enforcing design, quality, safety and environmental requirements.	UCS will assign a certified technical-supervision specialist meeting clauses 13-14 to every school project and will document the assignment. The designer will undertake authorship control, and the

#	Name of Law / Policy / Act	Relevant Provisions	Relevance for RBP ES Management	Actions Taken or to Be Taken by Implementing Agencies
		service and assigned by organizational order to the construction object; the specialist must have relevant higher education and at least three years of experience. The Resolution provides qualification categories but does not, by the cited provisions alone, establish an exclusive Category III inspector or mandatory daily physical visit for each school.		territorial construction inspection will exercise state oversight within its mandate.
16	Applicable sanitary and environmental quality norms, including SanPiN No. 0289-10 for organization of construction works; SanPiN No. 0179-04 for ambient air; SanPiN No. 0120-01 for workplace noise; and the current applicable community-noise hygienic standard	Establish hygienic requirements for construction sites and surrounding areas and prescribe permissible levels or quality requirements for dust, pollutants, noise, vibration, drinking water, sanitation and wastewater.	Relevant because many works may occur within operating schools or close to homes, exposing children, staff, workers and neighbours to dust, noise, vibration, poor sanitation and unsafe water.	The Design/EIA consultant will identify the current sanitary standards applicable at the date of design and incorporate their limits and monitoring requirements into the EIA, design and ES specifications. PM2.5 monitoring, fixed sprinklers or other instrumentation will be required where imposed by the SEE conclusion or justified by risk; no unverified 500 m2 nationwide threshold is used.
17	Law on Fire Safety, Law No. ZRU-226 (30 September 2009), and applicable fire-safety rules	Defines responsibilities for preventing fires, maintaining fire-protection systems, training, emergency preparedness, inspection and compliance with fire-safety requirements.	Applies to construction hot work, fuel and chemical storage, temporary electrical systems and the design and operation of school fire detection, suppression and evacuation arrangements.	The Design/EIA consultant will incorporate code-compliant fire and life-safety systems and evacuation routes and obtain review by the competent fire authority. UCS will inspect fire precautions, and the fire authority will participate in statutory review and completion approval.
18	Law on Public Procurement, Law No. ZRU-684 (22 April 2021, as amended)	Establishes requirements for transparent, competitive and accountable procurement, bidder qualification and contract administration.	Provides the mechanism for making design, EIA/SEE, labour, OHS, community safety, accessibility, and reporting requirements contractually enforceable.	MOES will include the approved designs, SEE conditions and standard ES specifications in bidding documents and contracts, with adequate budget provisions. UCS will administer and enforce these requirements.
19	Law No. ZRU-940 on Energy Saving, Rational Use of Energy and Improvement of Energy Efficiency (7	Promote energy-efficient design and technologies, energy conservation and	Relevant to thermal comfort, energy-efficient school design and safe	The Design/EIA consultant will incorporate applicable energy-efficiency and renewable-energy

#	Name of Law / Policy / Act	Relevant Provisions	Relevance for RBP ES Management	Actions Taken or to Be Taken by Implementing Agencies
	August 2024); Law No. ZRU-539 on Use of Renewable Energy Sources (21 May 2019)	use of renewable energy in public infrastructure.	installation and operation of solar systems.	requirements. UCS will verify installation and testing, and MOES will include O&M and end-of-life arrangements in handover guidance.
G	**Labour-Related**			
20	Labour Code of the Republic of Uzbekistan, Law No. ZRU-798 (28 October 2022, effective 30 April 2023, as amended)	Regulates employment contracts, wages, working time, leave, termination, non-discrimination, occupational safety, worker representation and labour disputes. Prohibits forced labour and establishes protections and restrictions for workers under 18.	Applies to workers engaged by contractors, subcontractors, supervision entities and implementing agencies. Construction presents risks of informal employment, wage disputes, discrimination, forced labour and child labour.	Contracts will require written terms of employment, timely wages, lawful working hours and benefits, equal opportunity, age verification, and prohibition of forced labour and hazardous work by persons under 18. Contractors will maintain worker records and a confidential worker grievance mechanism accessible without retaliation.
21	Law on Labour Protection No. 839-XII of 6 May 1993, in the new edition approved by Law No. ZRU-410 of 22 September 2016 (in force 24 December 2016) and as further amended by Laws ZRU-456 (2018), ZRU-586 (2019) and ZRU-770 (2022); Cabinet Resolution No. 1066 of 31 December 2018 on labour protection services	Requires employers to provide safe workplaces, risk prevention, instruction and training, PPE, medical examinations where required, first aid, investigation and registration of accidents and occupational diseases, and competent labour-protection arrangements. Resolution No. 1066 specifies organizational requirements for labour-protection services.	Directly relevant to excavation, demolition, work at height, electrical works, lifting, machinery, dust, asbestos, hot work, temporary works and work near school occupants.	Each contractor will assign a qualified ES inspector to every active school site and implement an OHS plan. UCS will inspect OHS daily, record instructions and investigate incidents. The State Labour Inspectorate retains regulatory enforcement authority.
22	Law No. ZRU-210 on Mandatory Insurance of Employers' Civil Liability (16 April 2009)	Requires employers to insure civil liability for harm to employees' life or health arising from occupational injury, disease or other work-related damage.	Protects workers and establishes financial responsibility for occupational injuries and fatalities during school works.	Bidding and contract documents will require contractors and subcontractors to maintain legally required employer-liability insurance and submit valid evidence before mobilisation and upon renewal.
H	**WASH/Women/Child**			
23	Law on Sanitary and Epidemiological Well-being of the Population, Law No. ZRU-393 (26 August 2015); SanPiN No. 0341-16 on conditions and organization of education in general education schools, as amended; and SanPiN No. 0017-21 on organization of food for students in general,	Establish sanitary and epidemiological requirements, state sanitary supervision and obligations to prevent harmful exposure and communicable-disease risks and to maintain hygienic conditions. SanPiN No. 0341-16 sets binding, school-specific WASH and facility requirements — covering site layout, classroom and	Relevant both to WASH conditions during construction (worker accommodation where used, drinking water, toilets, food hygiene, vector control, communicable disease prevention) and, more importantly, to the permanent WASH standard the completed and rehabilitated schools themselves must meet under	The Design/EIA consultant will provide toilets with handwashing stations, safe drinking-water points, canteen/kitchen sanitary facilities, and accessible WASH facilities for students with disabilities. Contractors will provide potable water, adequate toilets and washing

#	Name of Law / Policy / Act	Relevant Provisions	Relevance for RBP ES Management	Actions Taken or to Be Taken by Implementing Agencies
	secondary-specialized and vocational educational institutions	sanitary-block parameters, drinking-water supply, sewerage/sanitation systems, ventilation, lighting, heating, and the number, type and gender-separation of toilet and handwashing facilities per student — and applies in addition to construction-industry sanitary norms. SanPiN No. 0017-21 sets parallel requirements for school catering, food-handling hygiene and kitchen/canteen sanitary facilities.	national law — i.e., functioning, gender-separated, accessible toilets and handwashing facilities with a safe water supply, in numbers proportionate to enrolment, and safe wastewater/sewerage disposal.	facilities, hygienic eating areas, pest and vector control, routine cleaning and disease-prevention measures during works. UCS will inspect these facilities and verify final WASH facilities before handover, while school administrations will maintain WASH and cleaning arrangements after handover, including basic operations and maintenance budgeting for water supply, sanitation, and hygiene consumables.
24	Law No. ZRU-561 on Protection of Women from Harassment and Violence (2 September 2019, as amended); Law No. ZRU-562 on Guarantees of Equal Rights and Opportunities for Women and Men (2 September 2019)	Prohibit harassment, violence and sex-based discrimination; establish victim rights, confidentiality, preventive and protective measures, and responsibilities of education, labour, law-enforcement and local authorities; and guarantee equal rights and opportunities for women and men.	Relevant to employment practices, worker conduct, interaction between workers and school communities, and confidential handling of sexual harassment, exploitation or abuse allegations.	The legal basis includes Law No. ZRU-829 of 11 April 2023, which introduced Article 41-1 of the Code on Administrative Liability penalising sexual harassment irrespective of the sex of the victim, extended Criminal Code Article 121 to coercion into sexual relations by a person on whom the victim is in official, material or other dependency with an aggravated penalty where the victim is under eighteen, and introduced Article 141-3 on non-consensual distribution of intimate images. UCS will verify Codes of Conduct and training and supervise worker conduct near schools. The Program grievance mechanism will include survivor-centred handling, confidentiality and referral to competent services.
25	Law No. ZRU-641 on the Rights of Persons with Disabilities (15 October 2020)	Guarantees equality, non-discrimination, accessibility of buildings, transport, information, education and employment, and reasonable measures enabling	Applies to school design, temporary access during construction, information disclosure, consultations, employment and grievance mechanisms, including accessible WASH facilities.	The Design/EIA consultant will incorporate ramps, tactile strips, accessible entrances, accessible sanitary facilities, signage and safe

#	Name of Law / Policy / Act	Relevant Provisions	Relevance for RBP ES Management	Actions Taken or to Be Taken by Implementing Agencies
		persons with disabilities to participate in public life.		evacuation consistent with national standards.
26	Law on Guarantees of the Rights of the Child, Law No. ZRU-139 (7 January 2008, as amended); Law on Education, Law No. ZRU-637 (23 September 2020)	Protect children's rights to health, safety, dignity, and education, and require safe, appropriate, and equitable learning conditions.	Relevant to child safety, continuity of education and equitable benefits during school construction and modernization.	MOES will apply transparent school-selection criteria and require child-safety and continuity arrangements. The design consultant will address safe phasing, and UCS will verify protection of students during works.
I	**Grievances**			
27	Law No. ZRU-445 on Appeals of Individuals and Legal Entities (11 September 2017, as amended); applicable acts establishing the People's Reception Offices and Virtual Reception of the President; and Law No. ZRU-1002 of 15 November 2024 on the Commissioner of the Oliy Majlis for Human Rights (Ombudsman)	Law No. ZRU-445 establishes procedures and response periods for applications, proposals and complaints. Law No. ZRU-1002 permits complaints to the Ombudsman concerning acts or omissions of organizations or officials that violate human rights. A complaint is generally filed within one year of discovery of the violation or of the latest decision if other remedies were used; the law does not impose a universal exhaustion requirement. Anonymous complaints are not considered, while identified complaints may be handled confidentially.	Provides the national basis for grievances from workers, school communities and other affected persons concerning site selection, construction impacts, safety, access, conduct or service disruption, and gives affected persons more than one channel — Program-specific, administrative and independent — through which to raise concerns and escalate unresolved complaints.	MOES will operate a Program grievance mechanism with entry points at school, UCS, regional and national levels, publicised in a form accessible to school staff, students, parents and nearby communities. MOES will maintain a consolidated register, respond within defined timelines, permit confidential complaints, prohibit retaliation and disclose escalation and appeal options, including referral to the People's Reception Offices/Virtual Reception or the Ombudsman where a complainant is not satisfied with the Program-level response. SEA/SH complaints will follow confidential, survivor-centred referral procedures.
28	Law on Guarantees and Freedom of Access to Information (24 April 1997, as amended) and applicable transparency requirements	Guarantees access to information and requires public bodies and institutions to provide information affecting lawful interests, subject to legal restrictions.	Supports disclosure of school-selection criteria, EIA/SEE information, construction schedules, monitoring results and grievance procedures.	The Design/EIA consultant will support EIA disclosure and public hearings. MOES and regional bodies will disclose relevant Program information through accessible channels, and UCS will support site-level notices.
J	**Cyber-Security**			
29	Law on Personal Data, Law No. ZRU-547 (2 July 2019); Law on Cybersecurity, Law No. ZRU-764 (15 April 2022)	Regulates the collection, processing, storage, access, disclosure, and protection of personal data and requires organizational and technical measures to protect information systems, maintain	Addresses BILIM ESSA risks concerning the privacy and security of student and teacher records in EMIS, assessment, and data-driven management systems, including risks of unauthorized access,	MOES will apply data minimization, lawful purpose and access controls; protect records through role-based permissions, secure storage, backups, audit trails and incident-

#	Name of Law / Policy / Act	Relevant Provisions	Relevance for RBP ES Management	Actions Taken or to Be Taken by Implementing Agencies
		data integrity and availability, back up data, and respond to cybersecurity incidents.	exclusion through inaccurate data, and loss or misuse of sensitive information.	response procedures; restrict disclosure; correct inaccurate records; and provide accessible channels for data-related complaints.
K	**OHS**			
30	Cabinet of Ministers Resolution No. 286 of 6 June 1997 (Regulation on the investigation and recording of industrial accidents and other work-related harm to workers' health), as amended by Resolution No. 1066 of 31 December 2018 (the same resolution cited at row 20) and Resolution No. 134 of 5 July 2010	Establishes the procedure for investigating and recording industrial accidents and work-related harm to health; the composition of the investigation commission; the special investigation of group, fatal and serious-outcome accidents; and oversight by the superior economic body, the trade union or other worker-representative body and the state technical labour inspector.	Provides the operative accident-investigation and recording mechanism for the school construction works, giving procedural effect to the accident investigation and registration duty under the Law on Labour Protection (row 21) and defining how injuries and fatalities on site are investigated, recorded and escalated.	Contractors are required to investigate and record all incidents in accordance with this procedure, notify UCS and MOES immediately of serious or fatal accidents and cooperate with the state technical labour inspector. UCS will verify investigation records and corrective actions and reflect incidents in its monthly reporting.
31	Cabinet of Ministers Resolution No. 819 of 24 December 2025 (Regulation on the development of labour-protection instructions)	Requires employers to develop labour-protection instructions based on OHS rules and norms and the occupational-safety standards system; such instructions do not replace the OHS rules in force. Businesses with up to 20 workers engaged in activities of occupational-risk category up to 4 are exempt from developing instructions.	A recent national instrument into which site-specific health and safety requirements for works at operating schools can be written — complementing the general instruction, training and OHS-arrangement duties under the Law on Labour Protection (row 21) — rather than importing a parallel contractor management plan. Whether a given contractor falls within the small-enterprise exemption depends on workforce size and assigned risk category.	MOES and UCS will require each contractor to prepare labour-protection instructions under Resolution No. 819 covering the specific hazards of works in and around operating schools — work at height, excavation, demolition, electrical works, dust and asbestos, and separation of works from students and staff — and will confirm during the mission whether particular contractors qualify for the exemption. Instructions will be reviewed at induction and updated as works change.
32	Cabinet of Ministers Resolution No. 60 of 11 February 2005 (Rules on compensation by the employer for harm caused to workers by injury, occupational disease or other work-related impairment of health)	Establishes the employer's lump-sum allowance and compensation where a worker is fully or partly disabled through the fault of management; the cost of treatment, prosthetics and other medical and social assistance; retraining and re-employment; and, on death, a lump sum of not less than six average annual wages of the deceased.	Establishes the remedial entitlement for occupational injuries, diseases and fatalities during the school works, complementing the mandatory employer-liability insurance under Law No. ZRU-210 (row 22).	Contracts will require contractors and subcontractors to meet their statutory compensation obligations and to maintain the employer-liability insurance required under row 22. UCS will verify evidence of cover before mobilisation and following any incident.

#	Name of Law / Policy / Act	Relevant Provisions	Relevance for RBP ES Management	Actions Taken or to Be Taken by Implementing Agencies
33	Cabinet of Ministers Resolution No. 577 of 6 October 2022 (on the simplification of requirements in construction and the systematisation of technical regulation documents) and the applicable construction norms (SHNK) governing safety in construction	Governs the body of construction norms (SHNK) within which construction-safety requirements — work at height, edge protection, excavation, lifting operations and site-access control — sit.	Determines which construction-safety norm is currently applicable to the works and provides the technical baseline for site safety on the school subprojects, alongside the design, permitting and supervision requirements of the Urban Planning Code (row 14) and Resolution No. 321 (row 15).	The Design/EIA consultant and UCS will confirm the current applicable norms on construction safety with the design institute and the territorial construction inspection and incorporate their requirements into designs, ES specifications, and supervision checklists.
34	Technical occupational-safety norms and standards — Sanitary Rules and Norms (SanPiN); the State system of occupational-safety standards (GOST); and sectoral safety rules and enterprise-level instructions	Set workplace hygiene, ventilation, lighting, noise, and dust limits, and maximum allowable concentrations of harmful substances (SanPiN); generic safety requirements for processes, equipment, and protective means (occupational-safety standards); and branch-specific safety rules and enterprise instructions.	Provide the detailed technical requirements applied both to the construction workplace and to the completed school, including exposure limits that protect workers and, indirectly, occupants; they extend the sanitary and quality norms at row 16 to occupational exposures and give technical content to the labour-protection duties at row 21.	The Design/EIA consultant will incorporate applicable SanPiN and occupational-safety-standard limits into designs and the ESIA; contractors will apply them on site through workplace controls, PPE, monitoring and enterprise-level instructions (see Resolution No. 819, row 31). UCS will inspect compliance.
35	Contractor duties under urban-planning and construction legislation	Require the contractor to provide all workers engaged in the production process with labour-protection and technical-safety equipment and with collective and individual protective means; to comply with the lawful requirements of the customer's technical supervision, the designer's author supervision and the territorial construction inspection, which since Presidential Decree UP-66 of 14 April 2025 reports to the Inspection for Control in the Sphere of Construction and Housing and Communal Services under the Cabinet of Ministers rather than to the Ministry of Construction; and to furnish the customer with a declaration of conformity of completed works.	The statutory duty to supply protective equipment binds the contractor independently of the construction contract, and the three supervision channels — the same technical-supervision and authorship-control structure established by Resolution No. 321 (row 15) — are existing entry points for ES and OHS oversight on site.	MOES and UCS will use these three supervision channels — technical supervision, author supervision and the territorial construction inspection — to verify ES and OHS requirements on site. They will require the contractor's declaration of conformity at completion. Contract documents will reinforce the statutory PPE duty and make ES requirements expressly enforceable.
36	Enforcement and liability — State Labour Inspection; Sanoatkontexnazorat (State Inspection for Industrial, Mining and	The State Labour Inspection exercises labour and OHS oversight within its statutory mandate and participates in the investigation of relevant accidents and	Provides the state enforcement and liability framework for OHS. The ESSA fieldwork reported capacity constraints, but no verified national or district staffing	Because routine state assurance during construction is limited, MOES and UCS will provide the primary continuous OHS oversight through

#	Name of Law / Policy / Act	Relevant Provisions	Relevance for RBP ES Management	Actions Taken or to Be Taken by Implementing Agencies
	Technical Safety); and the Code on Administrative Liability	complaints. Sanoatkontexnazorat investigates specified group, fatal and serious accidents at facilities within its jurisdiction. Administrative liability may apply for breaches of labour-protection and safety rules. Any statement about inspection frequency or staffing is an empirical capacity finding and requires a current official source.	ratio is stated in this legal matrix. School construction does not ordinarily engage Sanoatkontexnazorat unless the facility or incident falls within its jurisdiction.	daily supervision, standard checklists, and monthly reporting; notify and cooperate with the State Labour Inspection on incidents; and require contractors to comply with all lawful inspection requirements.

Annex 3: Summary of Public Consultation Events and Stakeholder Engagement during the ESSA

Consultations/ Stakeholder Activities	Date/Time	Summary of Consultation Results				
		Key issues with the ES Systems related to the RBP	**Potential ES risks and impacts of the RBP**	**Potential contextual and programmatic risks to the RBP**	**Institutional capacity issues to manage the ES risks and impacts of the RBP**	**Other Issues**
Samarkand: Administration and Mahalla of School 38, Okdarya district	July 13, 2026 11:00 AM		Potential exposure of school children to construction works	Existing toilet facilities provide inadequate privacy and hygiene conditions.	Cleaning staff are available for routine school maintenance.	Cleaning staff are available for routine school maintenance.
Samarkand : Administration and Mahalla of School 3, Toylog district	July 13, 2026 12:30 PM		Limited removal or relocation of trees may be required within the proposed construction footprint.	-do-	Cleaning staff are available for routine school maintenance.	Cleaning staff are available for routine school maintenance.
Samarkand Governor's office: Governor Regional MOES Ecology Committee Single Customer Service	July 13, 2026 3:20 PM	Public consultation is required as part of the EIA/SEE process. Tree cutting is generally prohibited; where unavoidable, small or fruit trees may require relocation or authorized removal.	Limited removal or relocation of trees may be required within the proposed construction footprint.	.	District ecology inspectorates reportedly have six to eight staff.	Licensed service providers are available for asbestos management.
Tashkent: Ecology Expert at National Committee for Ecology and Climate Change	July 15, 2026 10:30 PM	School construction is treated as Category III; stakeholder consultation is mandatory, and a positive SEE conclusion is required before works. District inspectors visit proposed sites before approval to check trees, underground	Licensed waste facilities are available for asbestos. Recycling and disposal facilities are also available in each region		District inspectorates are staffed with inspectors. Construction-stage inspections are generally triggered by complaints or observed violations rather than undertaken according to a fixed schedule; penalties may be imposed.	Licensed facilities and service providers are available in each region for asbestos, construction waste, recycling, and disposal. SEE review was reported to take about one week where documentation is complete and up to three weeks where revisions are required.

Consultations/ Stakeholder Activities	Date/Time	Summary of Consultation Results				
		Key issues with the ES Systems related to the RBP	**Potential ES risks and impacts of the RBP**	**Potential contextual and programmatic risks to the RBP**	**Institutional capacity issues to manage the ES risks and impacts of the RBP**	**Other Issues**
		utilities, and nearby houses.				
Tashkent: World Bank team of BLIM Program	July 15, 2026 5:00 PM	BLIM PAP actions were discussed and agreed with MOES.				Relevant BILIM actions may be retained or adapted for the RBP
Tashkent: Ministry of Construction, Housing and Community Services	July 16, 2026 3:30 PM	The standard government works contract contains fixed general conditions and does not by itself provide all Project-specific ES requirements. IFI ES requirements can be incorporated through the technical specifications and annexes to design documents.			Construction authorities maintain the contractor eligibility and performance system	Government construction procurement is undertaken through an electronic platform.
Termez, Surkhandarya: Administration and Mahalla of School 17, Dustilk	July 20, 2026 8:40 AM		Nearby houses may experience temporary dust, noise, traffic, and other construction disturbances. Works may affect fruit trees within or near the construction footprint.			Teaching staff were reported to be highly qualified.
Termez, Surkhandarya: Administration and Mahalla of School 24	July 20, 2026 10:00 AM			The school is not connected to the sewerage network. Existing water and electricity supplies were reported to be adequate.		Parents supported the proposed expansion and considered it likely to create additional opportunities for teachers.

Consultations/ Stakeholder Activities	Date/Time	Summary of Consultation Results				
		Key issues with the ES Systems related to the RBP	**Potential ES risks and impacts of the RBP**	**Potential contextual and programmatic risks to the RBP**	**Institutional capacity issues to manage the ES risks and impacts of the RBP**	**Other Issues**
Termez SCS Ecology Committee	July 21, 2026 10:00 AM	SEE approval was reported to take five days. A district inspector visits the site before approval and records each tree. Contractors may have environmental personnel at their central offices, but dedicated site coverage is not required.	Dust is the most common construction complaint. Larger sites may be required to install PM2.5 monitors and water-spraying systems.	A peak workforce of about 70 is expected, approximately 95 percent of whom would be recruited locally, limiting labour influx. Women were not expected to undertake construction work.	Single Customer Service reportedly has five to six staff in each district and conducts daily site visits, although visits may be brief because inspectors cover several sites. Ecology has approximately four inspectors in each district.	
Karshi, Kashkadarya: Facilities, Mahalla and Administration of School 85	July 22, 2026 9:40 AM		Nearby houses may be affected by temporary construction noise and dust.		School staff includes 3 cleaners and 1 gardener	Parents requested a meeting hall and improved ICT education facilities.
Karshi, Kashkadarya: Mahalla and Administration of School 18	July 22, 2026 12:10 PM		Nearby houses may be exposed to temporary construction disturbance	The existing building is in poor condition and may require partial demolition. Existing toilets use septic tanks, and water is purchased from suppliers.		
Nishan Kaskhadarya: Administration of School 10	July 22, 2026 3:00 PM		Unless adequate water and wastewater arrangements are incorporated into the design, the new facilities could face an unreliable water supply,		The school has 12 cleaners, regular solid-waste collection, and an adequate operation-and-maintenance budget.	
Karshi, Kashkadarya: Deputy Head of Ecology Representative of SCS	July 23, 2026 10:30 AM	No separate ES report is currently required. Monthly Single Customer Service			Single Customer Service has about 65 staff across the region, including	

Consultations/ Stakeholder Activities	Date/Time	Summary of Consultation Results				
		Key issues with the ES Systems related to the RBP	**Potential ES risks and impacts of the RBP**	**Potential contextual and programmatic risks to the RBP**	**Institutional capacity issues to manage the ES risks and impacts of the RBP**	**Other Issues**
		reporting focuses mainly on physical progress, quantities, and payments. Single Customer Service checks OHS provisions and may issue instructions, but the existing approach was described as more responsive than preventive.			approximately 30 technical staff and around two technical staff in each district. Inspectors cover multiple sites, which may constrain the depth and duration of site supervision.	
Bhukara: Ecology Directorate SCS Regional MOES	July 24, 2026 10:00 AM	All school works fall under Category III, with EIA/SEE review completed in seven days.	Construction incidents occur. Contractors are responsible for isolating construction areas from students and teachers. Waste, e-waste, and potential hazardous materials require segregation and documented transfer to authorized service providers.		Single Customer Service has about 65 staff, including technical personnel, with two to five staff distributed to each district. Ecology has about 110 staff, including 56 inspectors and approximately four to five inspectors per district.	Waste-disposal facilities and service providers, including e-waste providers, are available in the region. Three regional waste centers reportedly segregate waste, recover reusable materials, and transfer residual waste for authorized disposal
Karakalpakstan Zoom meeting with Ecology and SCS representatives	July 28, 2026 3:00 PM				The regional Ecology Directorate has approximately 100 staff, with about five staff assigned to each district.	
Kungrat district, Karakalpakstan: Administration of School 36	August 24, 2026 11:00		Nearby houses may be affected by temporary construction noise and dust.		The school has a sufficient number of cleaners and an adequate operation-and-maintenance budget.	

Consultations/ Stakeholder Activities	Date/Time	Summary of Consultation Results				
		Key issues with the ES Systems related to the RBP	**Potential ES risks and impacts of the RBP**	**Potential contextual and programmatic risks to the RBP**	**Institutional capacity issues to manage the ES risks and impacts of the RBP**	**Other Issues**
Kungrat district, Karakalpakstan: Administration of School 35	August 24, 2026 12:00		Nearby houses may be affected by temporary construction noise and dust.		The school has a sufficient number of cleaners and an adequate operation-and-maintenance budget.	Possible cutting of existing trees in the proposed construction area. According to the administration, the trees are not in good condition and permission for their removal has already been obtained from the Ecology Committee.
Nukus district, Karakalpakstan: Administration of School 19	August 24, 2026 16:00		Nearby houses may be affected by temporary construction noise and dust.			Several locations are available within the school territory for construction of the new building.
Karakalpakstan: Meeting with the head of the MOES department, with participation of Design Institute representatives and the Regional Environmental Department	August 24, 2026 17:30					It was recommended that the government decree establish a procedure allowing unavoidable tree relocation or removal only with prior authorization from the Ecology Committee and compliance with compensatory planting requirements.

Annex 2.1: Tree Cutting Procedures and Responsibilities

Stage	What is done	Responsible	Evidence
Screening and design	Identify and record existing trees on and adjacent to the footprint; design to avoid valuable species; reserve not less than 25 percent of the allocated land area for greening.	Design/EIA consultant, engaged by MOES for all participating schools	ZVOS documentation; site plan
Site inspection	Inspect the site and record each tree before the conclusion is issued.	District environmental inspector, regional Ecology Committee	Inspection record held with the SEE file
Authorization	Where removal is unavoidable and exempted, apply for and obtain prior authorization; the authority determines the compensatory planting obligation and any payment for damage caused to flora, which is borne by MOES as compensation.	MOES, through the participating school, applies as initiator; the regional Ecology Committee determines	Written authorization; SEE conclusion conditions
Pricing	Include compensatory planting and greening as priced work items in the design and cost estimate.	Design/EIA consultant; approved by the state expertise body	Approved design and bill of quantities
Execution: trees	Carry out authorized removal only as permitted; undertake compensatory planting of ten large saplings for each tree or shrub removed; maintain for not less than two years.	Contractor, under the works contract	Contractor monthly ES report; planting records
Supervision	Verify that no unauthorized removal occurs and that compensatory planting and greening are carried out as designed.	UCS, with the MOES regional branch	Construction supervision file
Acceptance	Verify completion of the required greening as a condition of acceptance.	State Acceptance Commission, convened by the khokimiyat	Completion certificate
Operation	Preserve and care for trees attached to the building; maintain compensatory planting.	MOES regional branch and school administration	Tree Register extract; school maintenance records

Annex 4: Checklists for Assessing the ES Management Systems Against Core Principles and Core Elements

Core Principles	Core Elements	Indicative Checklists	Response to Each Question in the Checklist
Core Principle 1: Promote environmental and social sustainability in the RBP's design.	Operate within an adequate legal and regulatory framework to guide ES impact assessments, mitigation, management and monitoring at the RBP level.	What relevant ES laws, regulations, procedures, decrees, or other mandatory legal instruments (national, regional, and sectoral/program levels) are applicable to the RBP activities and their associated risks and impacts?	The applicable framework is summarised in Section 3.1.1 and detailed in Annex 2.
		Are critical adjustments and measures to the regulatory framework needed before the start of the RBP?	No legislative amendment is required before RBP implementation.
		Do the relevant ES management systems include mechanisms, where appropriate, to ensure objective or independent assessment of ES impacts?	MOES, as the proponent, will carry out the ES assessment through the Design/EIA Consultant. The Regional Ecology Committee will conduct an independent assessment through site visits before issuing SEE clearance.
Core Principle 2: avoid, minimize or mitigate adverse impacts and promote informed decision-making relating to the RBP's environmental and social impacts.	Incorporate recognized elements of good practice in ES assessment and management, including: (i) early screening of potential impacts;	Do the applicable ES management systems require early screening of potential ES impacts?	All development activities fall into one of 3 categories as per Resolution No. 234. No separate screening is needed to assess the project category.
		Do relevant procedures require ES screening/assessment of activities associated with the RBP?	Yes, all school construction activities fall under Category III and require EIA/SEE.
		Are ES screening procedures comprehensive?	Law No. ZRU-1036 requires consideration of environmental and social impacts, human health, cultural heritage and greenhouse gas emissions.
		Does screening lead to ES assessments that are proportional in depth and scope to the identified adverse impacts and risks (e.g., does it apply ES risk categories?)	General secondary school works are treated as Category III, and each school requires EIA documentation and a positive SEE conclusion before construction.
		Do screening procedures include opportunities for stakeholder involvement in the identification of priority ES risks and impacts?	As per Resolution No. 234, the Ecology Committee determines the need for a public hearing, considering the project location and impacts. However, the Ecology Committee

Core Principles	Core Elements	Indicative Checklists	Response to Each Question in the Checklist
			reported that consultations are required for all school construction works.
		Do these requirements specifically apply to the Program to be supported by the RBP operation? Has screening for, and estimation of, ES effects been a part of the Borrower's program design?	Yes. The MOES has already engaged a Design/EIA consultant to carry out the screening as per RBP exclusion criteria (as per Section 2.3 of ESSA) and prepare EIA documentation.
		Has RBP screening identified potential subprojects under the Environment and Social Exclusion List (ESEL)? If such activities have been identified, have the activities been excluded from the program?	No.
	(ii) consideration of strategic, technical, and site alternatives (including the "no action" alternative);	Do the applicable ES management systems require the consideration of alternatives or other forms of options assessments to avoid or minimize potential impacts and risks? I.e., are strategic, technical, and site-selection alternatives considered, including a "do nothing" option?	National EIA practice does not consistently document a structured comparison of strategic, technical, site and no-action alternatives for Category III school works.
		Which other forms of strategic planning, such as sectoral master planning, are used to identify ES risks and impacts? Do they consider relative ES costs and benefits?	Selection of schools considered for the RBP follows strategic criteria such as overcrowding, population growth, ES risk, land availability, and building condition, but a comparative assessment of ES costs and benefits was not documented.
		Has RBP screening considered site alternatives?	School construction under the RBP will be carried out within existing school compounds; hence, site alternatives are not relevant.
	(iii) explicit assessment of potential, induced, and cumulative impacts;	Do RBP procedures require the consideration of induced and cumulative impacts as part of screening, options assessment, and/or ES Impact Assessment?	The national assessment is primarily activity-specific and does not clearly require a separate induced and cumulative impact analysis for low-risk school works.
		Do the procedures allow for, or promote, the use of tools (such as strategic ES impact assessments and/or strategic management plans) to help identify and evaluate such impacts?	Law No. ZRU-1036 establishes strategic environmental assessment, but such assessment is not relevant for the RBP.
		Do the procedures include measures for evaluating critical environmental issues such as transboundary pollution, biodiversity loss, international waterways, and climate change?	Not relevant for RBP activities.

Core Principles	Core Elements	Indicative Checklists	Response to Each Question in the Checklist
		If so, do they consider the implications to and from RBP activities (i.e., double materiality)? Do RBP systems require assessing the risks from natural disasters and/or human emergencies? Does the RBF assessment provide adequate opportunities to engage stakeholders on induced, cumulative, and transboundary impacts?	 The schools will be designed for seismic and fire safety risks as per the Urban Planning Code. No such impacts are anticipated from RBP activities
	(iv) identification of measures to mitigate adverse environmental or social risks and impacts that cannot be otherwise avoided or minimized;	Do the applicable systems effectively promote the application of the mitigation hierarchy (e.g., avoid, minimize, mitigate, compensate/offset)? Are mitigation/management measures under the system relevant and realistic? Do they require time-bound actions, clear targets, and clear assignment of responsibilities for implementation? Do the applicable systems include clear and appropriate repercussions and remedies in case ES mitigation measures are not applied?	Avoidance is applied through the RBP exclusions. EIA/SEE conditions establish mitigation, and tree removal requires prior authorisation and compensation. SEE conditions are generally relevant and realistic to conventional school-construction impacts, and Law No. ZRU-1036 requires quarterly compliance information. SEE non-compliance can result in instructions, suspension and administrative sanctions, and UCS and labor authorities have powers to reject or stop unsafe or non-compliant work.
	(v) clear articulation of institutional responsibilities and resources to support implementation of plans; and	Are RBP entities responsible for ES aspects adequately resourced and staffed—in terms of skills, qualifications, and number of staff—to ensure effective administration, planning, design, implementation, and monitoring functions? If the RBP does not include sufficient in-house capacity for the Client, what other alternative arrangements (e.g., coordination with other agencies, use of consulting services) are available to promote program effectiveness? If present, what arrangements are in place to ensure effective and timely coordination? If none, what needs have been identified for supplementary support and/or capacity strengthening?	MOES has currently engaged one environmental consultant for the RBP. UCS has qualified technical inspectors, but they have multiple construction sites to inspect daily. Available arrangements include national environmental and social consultants in the Program office, regional ES focal points, contractor site ES inspectors, and training provided to UCS inspectors. The IPF component will also finance a construction supervision consulting firm, including OHS supervision and ES monitoring consultants working at regional level to supervise project implementation.

Core Principles	Core Elements	Indicative Checklists	Response to Each Question in the Checklist
		Are the RBP entities effective at applying their ES frameworks in practice? Are "adaptive management" processes in place to respond to unanticipated ES management issues?	The current process is mainly reactive ES management rather than preventive management.
		Do RBP entities have access to contingency funds for unexpected impacts or budget shortfalls?	The fund allotment is usually fixed on an annual basis.
		With the screening results on potential ES impacts, if the agency has any issues with budget for managing the potential impacts.	MOES has no established standalone ES budget line, and ES measures can be missed if they are not included in the approved design and estimate.
	(vi) responsiveness and accountability through stakeholder consultation, timely dissemination of the RBP information, responsive grievance redress mechanisms and access to independent accountability mechanisms.	What mechanisms do program entities use to ensure that stakeholders are identified and that their views, concerns, and suggestions are systematically considered?	Stakeholder consultations are carried out only during the EIA process, and their views and concerns are recorded.
		Does the Borrower consult with stakeholders on various aspects of RBP design and operation?	MOES and other institutions were consulted during ESSA preparation, together with school administrators, mahalla representatives and students' families.
		What are the implementation practices of the agency in disclosing of relevant RBF information.	Information-access laws and government platforms support disclosure, and the draft and final ESSA will be disclosed through AIIB and government channels.
		What are the implementation practices of the agency in managing if complaints/grievances.	People's Reception Offices, the Virtual Reception, courts and the Ombudsman provide functioning channels and defined response periods.
		Does the Borrower have specific laws or regulations on information disclosure and grievance address.	Law No. ZRU-445, information-access legislation, the People's and Virtual Reception arrangements and the Ombudsman framework govern disclosure, appeals and escalation
Core Principle 3: avoid, minimize, or mitigate adverse impacts	Identify and screen for adverse impacts on potentially important biodiversity and cultural resource areas and	Has RBP screening identified potential impacts on modified, natural, or critical natural habitats? If such impacts involve the significant conversion or degradation of critical natural habitats, have the activities been excluded from the program?	No. All RBP works are confined to existing developed school compounds

Core Principles	Core Elements	Indicative Checklists	Response to Each Question in the Checklist
on natural habitats and cultural resources resulting from the RBP.	provides adequate measures to avoid, minimize, or mitigate adverse impacts.	Will the RBP activities affect environmentally sensitive habitat areas with local importance, such as streams, wetlands, ponds, and vegetated riparian areas?	No.
		Would RBP activities lead to the fragmentation of existing habitat areas, both at the level of localized Program activities and at larger landscape levels?	No.
		Do management plans require appropriate conservation and mitigation measures to be in place, including those required to maintain ecological services?	No.
	Support and promote protection, conservation, maintenance, and rehabilitation of natural habitats; avoid significant conversion or degradation of critical natural habitats; and if avoiding the significant conversion of natural habitats is not technically feasible, include measures to mitigate or offset the adverse impacts of RBP.	Does the RBP include management measures to protect, conserve, or rehabilitate habitats that are at risk? Are these measures consistent with recognized international good practice, including internationally recognized standards of sustainable forest management and use?	Not relevant to RBP.
		Are monitoring measures in place to determine the extent to which habitats are affected under the RBP?	Not relevant to RBP
		Have the relevant management authorities and other key stakeholders for such protected areas been consulted or otherwise involved in decisions that may affect the legal status or habitat values of the area?	Not relevant to RBP.
		If RBP activities may cause conversion or degradation of non-critical natural habitats, do Environmental Impact Assessment procedures include consideration of measures to avoid or minimize the severity of impacts?	Not relevant to RBP
		Do plans require appropriate conservation offset measures to be in place, including measures to maintain ecological services?	Not relevant to RBP
	Take into account potential adverse impacts on cultural resources and provide adequate measures to avoid, minimize, or mitigate these impacts.	Does the screening review involve careful attention to avoiding impacts on resources of archaeological, paleontological, historical, architectural, religious, or cultural significance?	Yes. EIA/SEE process includes review of cultural heritage.
		Is the mitigation hierarchy principle applied in the management of potential adverse impacts on physical cultural property, such as management measures to avoid, minimize, or mitigate?	Avoidance and authorisation requirements apply where cultural resources or protected zones may be affected.

Core Principles	Core Elements	Indicative Checklists	Response to Each Question in the Checklist
		Do Borrower systems include "chance find" procedures to take effect whenever RBP activities result in discovery of, or disturbance to, physical cultural resources?	National laws protect archaeological finds and require competent-authority involvement
Core Principe 4: protect public and worker safety against the potential risks associated with: (i) construction and/or operations of facilities or other operational practices under the RBP; (ii) exposure to toxic chemicals, hazardous wastes and other dangerous materials under the RBP; and (iii) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.	Promote adequate community, individual, and worker health, safety, and security, through the safe design, construction, operation, and maintenance of the RBP or, in carrying out activities dependent on existing infrastructure, incorporate safety measures, inspections, or remedial works as appropriate; promote measures to address child and forced labor.	Does the RBP have a legal framework that addresses and promotes workplace safety? Are there mandatory measures that compel contractors and facility operators to operate equipment and facilities in a manner that protects individuals and communities?	Yes, the legal framework establishes strong worker and structural-safety duties. General contractor obligations under these laws exist, but these measures are not specifically reflected in construction contracts.
		Does the Borrower require measures to help protect individuals and/or communities from violence, intimidation, harassment, criminal activity, or other negative interactions with contractors, laborers, operators, or other workers associated with a Program activity?	Yes. A code of conduct for workers shall be implemented. Workers convicted of specified sexual and violent offenses are barred from school construction works.
		Does the Borrower have specific laws or regulations to avoid the use of child and forced labor in the implementation of Program activities?	Labour Code and ratified ILO conventions prohibit forced labor and regulate minimum age and hazardous work by persons under 18.
	Promote the use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated under the RBP.	Does the Borrower have specific laws, regulations, procedures, standards, etc., to effectively evaluate and manage the potential effects of hazardous or toxic materials in the workplace?	Waste, water, sanitary, fire and OHS laws regulate hazardous materials. SanPiN No. 0158-04 provides specific asbestos-waste requirements for wet handling, sealed and labelled packaging, PPE, documented transport and authorized disposal.
		Does the RBP include safety measures and standards for pre-existing civil works or works under construction that pose potential hazards to people or the environment?	The works in existing buildings are limited to providing ICT facilities.
		Are emergency preparedness plans implemented and periodically reviewed? If plans are deficient, what safety measures or remedial works do Program entities need to undertake?	Fire safety facilities are available, and drills are routinely being conducted in schools
	Promote the use of integrated pest management practices to manage or reduce pests or disease vectors; and provide training for workers involved in the production, procurement, storage, transport, use, and	Where relevant, do RBP systems promote the use of integrated pest management practices to manage or reduce pests or disease vectors?	Not relevant to RBP activities.
		Does the RBP include appropriate technical guidelines and training for the safe production, storage, transport, use, and disposal of hazardous pesticides or other chemicals?	Not relevant to RBP activities.

Core Principles	Core Elements	Indicative Checklists	Response to Each Question in the Checklist
	disposal of hazardous chemicals in accordance with the relevant international guidelines and conventions.		
	Include adequate measures to avoid, minimize, or mitigate community, individual, and worker risks when the RBP is located in areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or affected by climate events.	As relevant, does the RBP include measures to ensure that people or the environment would not be put at increased risk from natural hazards? Does the Borrower assess the climate change risks associated with RBP activities, such as the estimation of the RBP's GHG emissions or the inclusion of appropriate mitigation and/or adaptation measures under the RBP operation?	Yes. Seismic and fire safety risks are included in the school designs. Greenhouse gas emissions are assessed as part of the EIA. The RBP includes green and energy-efficient infrastructure with renewable energy (solar) facilities.
Core Principle 5: manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assist the affected people in improving, or at a minimum restoring, their livelihoods and living standards.	Avoid or minimize land acquisition and related adverse impacts; identify and address economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people lacking full legal rights to resources they use or occupy; provide compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid before taking land or restricting access; provide supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment); restore or replace public infrastructure and community services that may be adversely affected by the RBP; and include measures in order for land acquisition and	Does the RBP screen all planned activities to determine if they may require involuntary land acquisition, relocation of residences or businesses, or restrictions to natural resources? Do RBP processes require identification and mitigation of all land-related impacts? Significantly, do systems adequately protect individuals and communities against "forced evictions"? As relevant, does screening consider impacts on various property regimes, including common property resources, customary or traditional rights to land or resource use, those who lack title or any recognizable claim, and Indigenous Peoples rights? Accordingly, do the processes require identification and mitigation of all significant impacts affecting informal users or occupiers of land (or other resources)? Do the RBP systems support livelihood restoration and support measures, including the necessary institutional provisions to ensure the effective implementation of such measures? If not, can the RBP provide supplemental payments to meet this requirement? Does the Borrower's system recognize the need to restore or replace public infrastructure lost because of RBP activities? If not, what mechanisms are in place to address such concerns?	Yes. The RBP is restricted to works within existing public school compounds and excludes involuntary land acquisition, physical or economic displacement, voluntary land contribution, access restriction and effects on third-party assets or livelihoods. Yes. Any such activities will be excluded from RBP scope. National procedures address registered rights but not informal users. Uzbekistan does not recognize Indigenous Peoples as defined in the RBP. Not relevant to RBP activities. Not relevant to RBP activities.

Core Principles	Core Elements	Indicative Checklists	Response to Each Question in the Checklist
	related activities to be planned and implemented with appropriate disclosure of information, consultation, and informed participation of those affected.	Do land acquisition procedures include appropriate requirements for the informed participation of affected people? Does information on land acquisition and/or resettlement provide sufficient notification of the rights of those affected, including rights to timely resolution of grievances?	Not relevant to RBP activities.
Core Principle 6: give due consideration to the cultural appropriateness of and equitable access to RBP benefits, giving special attention to the rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.	Provide for identification, analysis and promotion of measures to address gender aspects (including children) and disability in RBP consultations, design and implementation processes.	Do ES impact screening procedures include participation of females, children, disable persons? Do the conducted consultations on the RBP include females, children, and disable persons? Does the stakeholder engagement on the RBP have separated consultations with females, children, and disable groups. Is the RBP AP include any actions to address the identified gender aspects and the issues of children and disable persons. Are there any gender indicators in the DLIs of the RBP?	The EIA process does not explicitly require participation from vulnerable groups. The consultations so far conducted include females. Yes, inclusive stakeholder engagement activities will be carried out under the RBP. Yes. The Action Plan addresses inclusive engagement, Program-level grievance tracking, and confidential and child-sensitive handling of SEA/SH and other sensitive complaints Yes. DLI 3.4 addresses inclusion and equity, including gender-responsive and accessible school facilities
	Provide for meaningful consultations if Indigenous Peoples are potentially affected (positively or negatively), to determine whether there is broad community support for the RBP.	Do consultations include a representative cross-section of groups affected by the RBP (including women, Indigenous People, the poor, or other groups that might be underrepresented)? Does screening identify different property regimes, including common property resources, customary or traditional rights to land or resource use, and the rights of Indigenous Peoples? Are issues and concerns raised during the consultations resolved and documented systematically?	Yes, the proposed inclusive consultations under RBP will cover these groups. Note that Indigenous Peoples are not present in Uzbekistan. Yes. Yes.
	Provide for participation by the Indigenous Peoples in devising opportunities to benefit from exploitation of customary	Do RBP entities regularly review and consider consultation results to obtain or broaden community support?	No. But the proposed Action Plan require regular consultations and documentation of the feedback. No.

Core Principles	Core Elements	Indicative Checklists	Response to Each Question in the Checklist
	resources or indigenous knowledge.	Does the RBP exclude activities involving: adverse impact on natural resources to which Indigenous Peoples have traditional ownership or customary use rights; resettlement from or restriction to such communities' access to such lands; or the commercial exploitation of Indigenous Peoples' cultural heritage?	
	Give attention to vulnerable groups and, if necessary, take special measures to promote equitable access to RBP benefits.	Is there consideration of distributional equity, affordability, and cultural, racial, ethnic, or gender constraints to access or participation? Does the incentive structure within RBP agencies promote outreach measures to encourage equitable and affordable access to Program benefits? Does it consider how to alleviate cultural, racial, ethnic, financial, or physical barriers that hamper the participation of socially marginalized or disadvantaged groups?	The schools covered in the RBP are 78 from rural and 17 from urban, demonstrating the focus on rural areas. The results framework promotes additional operational spaces, reduced overcrowding, shifts, energy efficiency, and inclusion. The proposed school designs include elevators/lifts, ramps, toilets, gender-separated WASH, and improved learning facilities.
Core Principle 7: avoid exacerbating social conflict.	Consider conflict risks.	Is the RBP being implemented in areas of recognized fragility or in post-conflict zones? Do the screening and design of RBP activities consider the risks of creating or exacerbating social conflict, including conflicts with ethnic or racial dimensions? Are RBP agencies open to discussion with the Bank and consultation with stakeholders on potentially sensitive issues?	No. Material conflict is unlikely, but perceived unfairness in school selection, disruption of shared school space, worker recruitment, unresolved grievances and language or accessibility barriers could create local dissatisfaction. Transparent eligibility, actual-use screening, local consultation, accessible information in Uzbek and Karakalpak and timely grievance resolution are proportionate controls. Yes.

Annex 5: Standard Environmental and Social Specifications for School Works

These Environmental and Social (ES) Specifications shall be implemented by all contractors and subcontractors engaged in school construction works under the Results-based Project (RBP). They form part of the technical specifications and contractual obligations for each works package. They shall be applied together with the approved design, positive State Environmental Expertise (SEE) conclusion, and national legal requirements. These specifications cover the following sections:

A. Applicable regulations
B. ES staffing requirements
C. Standard ES mitigation measures for identified impacts
D. Code of conduct for all workers
E. Monthly ES performance reporting

Section A: Applicable Regulations and Contractual Requirements

The contractor shall comply with the following applicable legal and regulatory requirements:

- the Law on Environmental Expertise, Environmental Impact Assessment and Strategic Environmental Assessment (Law No. LRU-1036); the applicable Cabinet of Ministers requirements on EIA and SEE (Resolution No. 234); and the positive SEE conclusion for each school.
- the Urban Planning Code, construction norms and rules, and seismic, fire-safety, sanitary, WASH, accessibility, energy-efficiency and commissioning requirements applicable to school buildings (Law No. LRU-676, 2021 and Cabinet of Ministers Resolution No. 321 of 20 May 2021).
- National requirements on atmospheric air protection, dust and exhaust control, water protection, wastewater management, drainage, soil protection, spill prevention and protection of existing utilities and infrastructure (Law on Protection of Atmospheric Air (1996, as amended); Law on Water and Water Use (1993, as amended); Law No. LRU-393 on Sanitary and Epidemiological Well-being (2015); SanPiN No. 0289-10 for construction; SanPiN No. 0341-16 for general education schools; SanPiN No. 0350-17; and applicable drinking-water, wastewater, noise and vibration standards).
- National waste-management requirements (Law No. 362-11), including segregation, temporary storage, transport, recycling and disposal of construction waste, domestic waste, hazardous waste, asbestos-containing material, spent lamps, batteries, electrical and electronic waste, solar equipment waste and other regulated waste. Sanitary Rules and Norms No. 0158-04 on collection, transportation and disposal of asbestos-containing waste and SanPiN No. 0128-02
- National moratorium and permitting requirements on cutting or damaging trees and shrubs (Presidential Decree No. UP-46 of 30 December 2021). No tree shall be removed, pruned, damaged or relocated unless prior authorization has been obtained from the competent authority and compensatory planting requirements have been agreed and implemented.
- the Labour Code, the Law on Labour Protection and applicable occupational health and safety requirements, including employment documentation, working hours, wages, prohibition of child labour and forced labour, non-discrimination, PPE, first aid, accident investigation and worker grievance arrangements (Law No. LRU-798 (2022, as amended); Law on Labour Protection, Law No. LRU-410 (2016); Cabinet of Ministers Resolution No. 1066 of 31 December 2018; and Law No. LRU-210).

- National requirements for preventing harassment, violence, SEA/SH, child abuse and criminal conduct in educational environments, including worker screening where required by national law (Law No. LRU-561 and Law No. LRU-562).

Section B: Contractor ES Staffing and Responsibilities

B.1 Qualifications and Deployment

- **Minimum staffing**. The Contractor shall appoint one ES inspector for each active school construction site. The ES inspector shall be present full time whenever construction is in progress and shall not be shared between sites that are active at the same time.
- **Qualifications**. The ES inspector shall hold a university degree or recognized technical qualification relevant to construction, environmental management or occupational safety and shall have at least three years of practical experience supervising ES and OHS performance on construction projects.

B.2 Duties of the ES Inspector

- Inspect the whole active work area before work starts each day, during critical activities and before the site is left unattended; record findings in the daily ES diary and verify closure of previous findings.
- Check compliance with the approved design, positive SEE conclusion, applicable laws, these specifications, and instructions issued by UCS.
- Coordinate daily with the school administration and UCS on access, student movement, teaching schedules, examinations, utility interruptions, deliveries, emergency access and other activities that may affect school operation.
- Verify that fencing, locked gates, warning signs, safe pedestrian routes, traffic marshals, excavation protection, housekeeping, PPE, worker facilities, fire precautions and emergency equipment remain effective throughout each working day.
- Provide and document all worker induction, daily toolbox talks, weekly training and monthly refresher training required under Section B.3, using languages and visual methods understood by the workers.
- Verify worker identity and age, criminal-record screening status, signed Code of Conduct, employment terms, insurance and induction before permitting site access, and keep personal information secure and accessible only to authorized persons.
- Maintain registers for workers, training, PPE, inspections, incidents, near misses, grievances, waste generation and transfer, hazardous materials, asbestos, spills, regulatory visits, non-conformances and corrective actions.
- Immediately report serious incidents and ensure that unsafe areas are secured, emergency assistance is obtained, evidence is preserved, and corrective actions are implemented without delay.
- Prepare the monthly ES performance report in Section C, obtain the Contract Manager's certification and submit it to UCS within the required time.

B.3 Worker Training by the ES Inspector

Training is a continuous obligation. Attendance shall be recorded by date, topic, trainer, language, worker name and signature or other verifiable confirmation.

Daily training and briefings

- Provide induction before a new worker first enters the site, covering site boundaries, school rules, child safeguarding, the Code of Conduct, worker and community grievance channels, emergency

contacts, incident reporting, PPE, prohibited conduct and the worker's right to leave imminent danger without retaliation.

- Conduct a pre-start toolbox talk for every crew before work begins, addressing the day's tasks, hazards, controls, weather, interaction with students and staff, traffic, utilities, housekeeping, waste, emergency response and lessons from recent observations or near misses.

Weekly training

- Conduct at least one documented weekly training session for all workers, rotating through work at height, excavation, lifting, scaffolding, machinery, electrical safety, hot work, fire prevention, first aid, traffic safety, dust and noise control, spill response, waste segregation, asbestos awareness and emergency procedures.
- Include regular sessions on school continuity, safe interaction with children and staff, prohibited access to school-only areas, the Code of Conduct, prevention of SEA/SH, confidential reporting, non-retaliation and respectful workplace behavior.

Monthly training and drill

- Conduct one formal monthly refresher for all workers on the principal ES risks and recurring non-compliance identified during the month, with additional targeted coaching for trades or crews showing weak performance.

B.4 Incident Notification

- Notify the Contract Manager and UCS immediately, and no later than 24 hours after becoming aware of any fatality, serious injury, child-safety event, fire, major traffic accident, significant spill or pollution event, collapse, uncontrolled asbestos disturbance, allegation of SEA/SH, violence, forced or child labour, or other incident likely to attract regulatory or public concern.
- Submit the investigation and corrective-action report within the period instructed by UCS. The Contractor shall not delay immediate safety measures while an investigation is pending and shall not investigate SEA/SH allegations outside the approved confidential and survivor-centred procedure.

Section C: Standard Mitigation Measures

The following measures are mandatory for the Contractor and all subcontractors. Each measure shall be integrated into daily work planning.

C.1 Site Establishment and Approved Work Areas

- Before mobilization, jointly verify with school administration and UCS the school boundary, approved footprint, existing uses, trees, utilities, sensitive receptors, emergency access, student routes and areas that must remain available to the school; photograph the pre-construction condition and do not occupy any unapproved area.
- Establish a continuous secure boundary around the construction site using robust fencing or hoarding with lockable gates, warning signs and controlled entry; inspect it at the start and end of each day and repair any opening immediately.
- Provide separate entrances and circulation routes for workers, construction vehicles, and school users wherever practicable; do not store materials, park machinery, or place temporary facilities on playgrounds, emergency routes, accessible paths, or school entrances unless specifically approved and an equivalent safe alternative is operating.

- Locate worker toilets, drinking water, rest areas, waste storage, fuel and chemical storage, material stockpiles and equipment away from student areas, kitchens, water points, drains and fire routes; worker accommodation shall not be established inside the school compound.

C.2 Continuity of School Operations and Child and Community Safety

- Agree the weekly work sequence with the school administration and UCS, taking into account school arrival and dismissal, examinations, assemblies, meal periods, sports, emergency drills, and activities involving younger children or children with disabilities.
- Schedule major excavation, concrete breaking, demolition, high-noise work, utility tie-ins and other disruptive or high-risk activities outside teaching hours, during weekends or school breaks wherever practicable; give the school adequate advance notice of unavoidable disruption.
- Maintain safe, clearly marked and adequately lit routes between school gates, classrooms, WASH facilities, play areas and emergency exits; provide accessible alternatives before closing any route used by a person with a disability.
- Keep all excavations, openings, scaffolds, cranes, lifting zones, machinery, stockpiles, chemicals and waste fully separated from students and the public; cover or guard openings and never leave a hazardous area accessible when the site is unattended.
- Prohibit workers from entering school-only areas, using student toilets, engaging with students without authorization, photographing or recording students, or sharing student information or images; any necessary entry shall be approved by the school and accompanied by an authorized school representative.
- Maintain school emergency access at all times and immediately remove any obstruction to fire service, ambulance, evacuation, or accessible routes.

C.3 Labour, Worker Facilities and Grievances

- Provide every worker with written, understandable employment terms covering duties, wages, working hours, overtime, benefits, leave, insurance, and termination; pay wages in full and on time; and keep verifiable employment and payment records.
- Do not use forced labour, trafficking, coercion or any worker under 18; verify age and identity before recruitment and prohibit discrimination in recruitment, pay, training, assignment, promotion, discipline or termination.
- Provide equal opportunity for qualified women and persons with disabilities, reasonable workplace adjustments where needed and a respectful workplace free from harassment, intimidation, exploitation or retaliation.
- Maintain a confidential worker grievance channel that accepts oral and written complaints, permits anonymous safeguarding reports, records resolution and preserves access to the State Labour Inspectorate, courts and other lawful remedies; urgent safety complaints shall be acted on immediately.
- Provide the worker with drinking water, toilets, handwashing, rest, and eating facilities required by Section C.5, and keep them clean, supplied, and separate from student facilities throughout the works.

C.4 Worker Screening, Conduct, SEA/SH and Child Safeguarding

- Before allowing any worker access to an operating school, verify identity and age and obtain the legally available certificate of criminal conviction or no criminal conviction. A person whose record indicates an offence involving a child, sexual violence, trafficking or serious violence shall not be deployed within the school compound. Screening records shall be kept confidential and processed in accordance with personal-data law.

- Require every direct, subcontracted, casual and daily worker to receive an explanation of and sign the Code of Conduct in Section D before first entry to the site; retain the signed copy and provide a copy or explanation to the worker in a language understood.
- Enforce strict worker separation from students and school-only areas, prohibition of unauthorized contact, photography, recording or online sharing, and prohibition of alcohol, illegal drugs, weapons, bullying, harassment, sexual exploitation and abuse and sexual harassment.
- Remove immediately from the school site any worker credibly alleged to present an immediate safeguarding risk, without prejudging the final outcome; activate the confidential referral procedure and cooperate with competent authorities in accordance with national law and survivor-centred principles.

C.5 Occupational Health and Safety

- Provide suitable PPE at no cost, including helmets, safety footwear, high-visibility clothing, gloves, eye and hearing protection, respiratory protection and fall-protection equipment appropriate to the task; replace damaged PPE immediately and enforce correct use.
- For work at height above two metres, use safe access, inspected scaffolds or work platforms, guardrails, fall restraint or fall arrest, secured tools and exclusion zones below; only trained and medically fit workers may perform the work, and ladders shall not be used as working platforms for prolonged tasks.
- Protect excavations through safe slope, benching, shoring, or trench support appropriate to soil and depth; provide guarded edges, safe access, water control, and daily inspection; keep spoil and equipment away from edges; and backfill or securely cover excavations as soon as practicable.
- Use only trained and authorized operators for machinery, lifting equipment, electrical work and hot work; maintain valid inspection certificates, guards, alarms, earthing, residual-current protection, lockout and tagout, lifting plans and fire-watch arrangements as applicable.
- Keep work areas, stairs, access routes and platforms free of debris, protruding nails, loose cables, oil, standing water and falling-object hazards; secure materials stored at height and provide adequate lighting for every work area.
- Provide potable drinking water, hygienic worker toilets and handwashing, shaded or heated rest areas as seasonally appropriate, eating areas separated from hazardous substances, first-aid kits and trained first-aiders; workers shall not use student toilets or school drinking-water points unless expressly designated.
- Manage heat, cold, dust, noise, vibration and manual-handling exposure through work-rest schedules, hydration, task rotation, mechanical aids, ventilation, wet methods and suitable PPE; stop work during dangerous weather or any condition that makes the task unsafe.
- Allow every worker to report unsafe conditions and leave a situation reasonably believed to present imminent and serious danger without retaliation, loss of wages or disciplinary action while the condition is assessed.

C.6 Construction Traffic and Access

- Use delivery routes, vehicle sizes, and delivery times agreed with UCS and the school; avoid student arrival, dismissal, and examination periods; and minimize heavy-vehicle movements through residential streets and near school gates.
- Install advance warning signs, barriers, cones and clearly marked pedestrian diversions before vehicle movement or work begins; use trained traffic marshals at gates, reversing areas, crossings and other points where vehicles could interact with students or the public.

- Enforce a maximum speed of 10 km/h inside the school compound and a suitably low speed near the school; require licensed drivers, seat belts, reversing alarms, daily vehicle checks, safe loads, and prohibit mobile-phone use, alcohol, and drugs while driving.
- Keep roads, sidewalks, and access points free of mud, debris, and parked equipment; cover loose loads; prevent overloading; and repair without delay any road, curb, drain, gate, or pavement damaged by construction traffic.

C.7 Dust and Air Emissions

- Use water on exposed soil, haul routes, cutting areas and stockpiles whenever visible dust could leave the work zone, taking care not to create runoff, slippery surfaces or excessive water use.
- Cover fine materials and waste during storage and transport, minimize drop heights, use wet cutting or local extraction for concrete and masonry, enclose cement mixing where practicable and stop dusty work during strong winds when controls are ineffective.
- Maintain engines and exhaust systems, switch off idling equipment and do not burn waste, vegetation, packaging, oils or any other material on or near the school site.

C.8 Noise and Vibration

- Use well-maintained equipment with effective silencers, acoustic covers and vibration controls; remove faulty or excessively noisy equipment from service until repaired.
- Plan the noisiest or vibration-generating activities with the school and nearby receptors, use the shortest practicable duration and perform them outside teaching, examination, rest and sensitive community periods wherever feasible.
- Give advance notice of exceptional noisy work, monitor conditions when required or when a substantiated complaint is received, and modify or stop the activity if it materially interferes with teaching, creates unsafe exposure, or risks damage to existing structures.

C.9 Soil, Topsoil, Drainage, Water and Wastewater

- Limit clearing and excavation to the approved footprint; strip, separately store and protect the upper 30 centimetres of fertile topsoil where present and reuse it for landscaping as required by the design.
- Install erosion, sediment and drainage controls before earthworks; protect drains from soil and cement, stabilize exposed areas promptly, maintain natural drainage and remove sediment without discharging it to school grounds, roads or water bodies.
- Mix concrete on an impermeable controlled surface and use a designated lined washout area; do not discharge concrete wash water, sanitary wastewater, chemicals, oils or sediment-laden water to soil, drains, irrigation channels or water bodies.
- Provide temporary worker sanitation connected to an approved sewer or sealed septic arrangement and have wastewater or sludge removed by an authorized service provider; prevent overflow, odor, vectors and student access.
- Do not reduce or interrupt water available for the school without prior approval and an adequate temporary supply; promptly repair leaks and test permanent water, drainage, sewerage and septic connections before handover.

C.10 Utility Protection and Service Interruptions

- Obtain current utility drawings, coordinate with relevant service providers, physically locate and mark underground and overhead services, and preserve required protection zones before excavation, lifting, or work near gas, water, electricity, heating, sewerage, or communication lines.

- Use safe excavation methods and hand digging where required near known services; do not excavate, support loads, stockpile materials, or operate lifting equipment within a utility protection zone without written clearance and the required supervision.
- Plan every utility tie-in with the school and service provider, give advance notice of the timing and expected duration and maintain temporary water, sanitation, power, heating, communications and fire-safety arrangements where interruption would affect safe school operation.
- If a service is damaged or interrupted unexpectedly, stop work, secure the area, notify the utility, school and UCS immediately and provide emergency support until the service is safely restored.

C.11 Construction, Municipal and Hazardous Waste

- Before mobilization, maintain a valid contract with SUE Makhsustrans where it serves the location, or another authorized regional sanitation or waste operator, for construction and municipal waste, and a separate valid arrangement with an authorized provider for hazardous waste including asbestos, used oil, batteries, mercury-containing lamps, paint waste and electronic waste.
- Segregate reusable, recyclable, non-hazardous, and hazardous waste in clearly labelled, covered, or secured containers; keep hazardous waste on an impermeable surface with secondary containment, and restrict access by students and unauthorized persons.
- Remove waste frequently enough to prevent accumulation, dust, odor, fire, vectors, or obstruction; use only authorized vehicles and destinations, and retain contracts, licences, waste passports, waybills, acceptance-transfer certificates, and evidence of final recovery or disposal.
- Reuse excavated soil and construction materials only where technically suitable, uncontaminated and approved; do not mix hazardous material with general waste and do not bury, burn, dump or abandon any waste on school land, roadsides, vacant land, drains or water bodies.
- Store used oil, oily rags, filters, paint, solvents, lamps, batteries, electronic components and contaminated absorbents separately; prevent breakage and leakage and transfer them through the authorized hazardous-waste system.

C.12 Asbestos and Other Existing Hazardous Materials

- Before demolition, drilling, cutting or removal of any existing roof, pipe, panel, insulation, ceiling, floor or coating, arrange a competent hazardous-material survey and make the findings available to UCS; no suspect material may be disturbed until it is identified.
- If suspected asbestos or another unidentified hazardous material is encountered, stop work immediately, isolate and secure the area, prevent access and dust, notify the ES inspector and UCS and obtain specialist assessment before resuming.
- Asbestos work shall be performed only by trained and authorized personnel using controlled wet methods, suitable respiratory and protective equipment, restricted work zones, decontamination procedures and tools that minimize fibre release; uncontrolled breaking, dry cutting, sweeping or compressed-air cleaning is prohibited.
- Package asbestos waste while damp in sealed, durable, labelled containers or wrapping; place it in a secure, designated temporary store; prepare the required waste passport; and transfer it only through an authorized provider to an approved disposal facility under sanitary supervision.
- Schedule asbestos removal when students and school staff are absent from the affected area, undertake final cleaning using fibre-safe methods and obtain documented clearance from UCS and the competent authority where required before the area is returned to normal use.

C.13 Stakeholder Information and Community Grievances

- Display a clear information board at the school entrance showing the Contractor, work schedule, emergency contact, ES inspector contact, UCS contact, and worker and community grievance channels in the relevant local language.
- Notify the school and affected neighbors in advance of disruptive work, access changes, utility interruptions, major deliveries, night or weekend work and activities that may create unusual noise, dust or traffic.

C.14 Fire Safety and Emergency Preparedness

- Coordinate site emergency arrangements with the school before mobilization, post current contacts and evacuation information, and ensure that construction fencing, storage, and temporary works do not obstruct school alarms, hydrants, firefighting access, evacuation routes, or assembly areas.
- Maintain suitable, inspected fire extinguishers at offices, stores, hot-work areas, electrical installations, and fuel or chemical storage; control smoking and ignition sources; and use a hot-work permit, fire watch, and post-work inspection for welding, cutting, or other spark-producing work.
- Maintain first aid and emergency lighting at worksites.

C.15 Restoration and Handover

- Remove temporary facilities, equipment, barriers, waste, and surplus materials; repair damage; reinstate roads, paving, drainage, playgrounds, utilities, and landscaping; and complete the required tree planting and greening using the preserved topsoil.
- Participate in a joint final ES inspection with UCS and the school administration, close every outstanding non-conformance and leave the site clean, stable, secure and safe for unrestricted school use before demobilization or acceptance.

C.16 Chance-Find Procedure

This procedure applies if any archaeological material, artifact, structure, grave, human remains, fossil, or other object with cultural, historical, religious, or scientific value is discovered during excavation or other work.

- Stop all work immediately within and around the discovery; do not move, clean, collect, photograph for public circulation or otherwise disturb the find or surrounding soil.
- Secure and barricade the area, protect it from weather, theft, vibration and unauthorized access and arrange a guard where removable objects or human remains may be present.
- Notify the ES inspector and UCS immediately. UCS shall notify the relevant territorial office of the Cultural Heritage Agency of the Republic of Uzbekistan and any other competent authority required by law.
- Record the date, location and circumstances without exposing the find, and follow all instructions issued by the Cultural Heritage Agency concerning assessment, protection, excavation, removal, conservation or redesign.
- If human remains are suspected, also secure the area from view and await instructions from the competent cultural heritage and law-enforcement authorities; treat the location respectfully and do not disclose images or personal information.
- Resume work in the affected area only after UCS provides written clearance based on the decision of the competent authority. Modify the work method or design as instructed, and retain the full change-of-scope record in the site file and monthly report.

Section D: Worker Code of Conduct - Ready-to-Sign Form

The Contractor shall require every worker to read, understand, sign and comply with the following worker code of conduct before entering the school compound or undertaking any project-related activity. The Contractor shall explain the Code during worker education in a language workers understand.

Worker Code of Conduct

I agree that I shall:

1. Comply with all applicable laws, site rules, safety instructions, school access restrictions, and instructions issued by the Contractor.
2. Act respectfully and professionally towards students, teachers, school staff, parents, community members, other workers and public officials at all times.
3. Remain only within authorised construction areas and do not enter school or other school areas unless expressly authorised and accompanied by designated school or Contractor personnel.
4. Avoid any unauthorised contact with students, including conversation, physical contact, photography, exchange of personal contact information, gifts, money, transport or social-media contact.
5. Never engage in harassment, intimidation, bullying, discrimination, threats, violence, exploitation, abuse, sexual exploitation and abuse, sexual harassment, or any behaviour that could place students, school staff, community members or workers at risk.
6. Never bring alcohol, illegal drugs, weapons or other prohibited items into the school compound or construction site, and never work while under the influence of alcohol, drugs or any substance that may impair safe performance.
7. Use the required personal protective equipment, follow safe work procedures, attend safety briefings, report hazards immediately and stop work where there is an imminent risk to workers, students, school staff or the public.
8. Protect the environment by preventing littering, unauthorised tree cutting, improper waste disposal, and damage to school property.
9. Use designated toilets, washing areas, eating areas and waste containers, and keep the site and surrounding school areas clean and orderly.
10. Report immediately to the site supervisor or Contractor ES Inspector any accident, injury, unsafe condition, unauthorised access by students or the public, grievance, safeguarding concern, suspected misconduct or breach of this Code.
11. Cooperate with any investigation, corrective action, disciplinary process or referral relating to incidents, complaints or breaches of this Code.

I understand that:

1. Compliance with this Code is a condition of working on the Project site.
2. Breaches of this Code may result in removal from the school compound, disciplinary action, termination of employment or subcontract, reporting to the relevant authorities, and other contractual or legal consequences.

Worker acknowledgement: I have received and understood this Worker Code of Conduct. I agree to comply with it and understand the consequences of non-compliance.

Worker name:
Position/company:
Signature:
Date:
Induction Provided by:

Section E: Monthly ES Performance Report

The ES inspector shall prepare the monthly report in the following template for each school site for each calendar month. The Contract Manager shall certify it and submit it to UCS and MOES no later than the fifth working day of the following month, together with the required attachments. Enter factual data into the relevant fields and provide evidence where relevant. Serious incidents shall be notified immediately under Section B.4 and shall not wait for the monthly report.

Monthly ES Performance Report Template

1. General Information

#	Field	Information to be completed
1	Reporting month	
2	School number and location	
3	Contract title and number	
4	Contractor	
5	Contract Manager	
6	ES inspector	
7	UCS technical supervisor	
8	Reporting period/submission date	

2. ES Indicators

#	Indicator	This month	Cumulative / status	Comments
A	**Work Force**			
1	Total workers			
2	Women workers			
3	Local workers			
4	Subcontractor workers			
5	Workers under 18			
6	Workers with completed identity, age and criminal-record screening			
7	Workers with signed Code of Conduct			
B	**OHS Record**			
1	Fatalities			
2	Lost-time injuries			
3	Medical-treatment injuries			
4	First-aid cases			
5	Near misses / dangerous occurrences			
6	Traffic accidents involving works			
7	Significant spills / environmental incidents			
8	SEA/SH allegations - number only; no identifying details			
C	**Waste**			
1	Excavated soil / spoil			
2	Concrete / masonry			
3	Municipal waste			

#	Indicator	This month	Cumulative / status	Comments
4	Asbestos-containing waste			
5	Other hazardous waste			
D	**Grievances**			
1	Worker grievances received/resolved/pending			
2	Community grievances received/resolved/pending			
3	Regulatory inspections / official instructions			
E	**Trainings**			
1	Toolbox Talks			
2	Workers Training			

3. Compliance Checklist

#	Requirement	Yes/No/ N/A	Evidence/finding	Action and due date
1	Valid positive SEE and condition register available			
2	Secure fencing, gates and student separation effective			
3	Safe pedestrian, accessible and emergency routes maintained			
4	Excavation, height, lifting and electrical controls compliant			
5	PPE available and correctly used			
6	Dust, noise and vibration controls effective			
7	Topsoil, erosion, drainage and concrete washout controlled			
8	School water and utility services maintained			
9	Worker toilets, water, handwashing and rest areas adequate			
10	Waste segregated, secured and removed by authorized providers			
11	Asbestos / hazardous-material controls compliant			
12	Trees and green space protected; landscaping status acceptable			
13	Fire precautions and emergency equipment functional			
14	Code of Conduct and safeguarding controls enforced			
15	Information board and grievance contacts displayed			

4. Non-Conformance and Corrective Action Register

No.	Date/location	Finding	Required action/owner	Due date	Status/closure evidence

5. Attachments to the Report

#	Attachment	Requirement
1	Photographic record	Minimum of five dated photographs showing active works, school separation, principal controls and any corrected non-compliance.
2	Training records	Signed or otherwise verifiable attendance for induction, daily toolbox talks, weekly training, monthly refresher and emergency drill.
3	Waste documentation	Provider contracts or validity confirmation, waste transfer notes, waybills, acceptance certificates and hazardous-waste passports for the month.
4	Incident reports	Required for all applicable incidents; exclude confidential SEA/SH case details.
5	Grievance log extract	Anonymized worker and community grievance status, excluding identifying safeguarding or SEA/SH information.
6	Non-conformance evidence	UCS instructions, corrective-action photographs and closure records.

6. Certification

Certification: We certify that this report is based on direct site monitoring and current site records and is accurate and complete to the best of our knowledge.

ES inspector - name, signature and date	
Contract Manager - name, signature and date	

Annex 6: Procedures for Management of E-Waste of ICT Classrooms

A. Purpose and Application

This Annex establishes the mandatory procedures and responsibilities for managing ICT equipment and e-waste for ICT classrooms under the RBP, including computers, monitors, interactive displays, multifunction printers, routers, switches, uninterruptible power supply units, voltage stabilizers, batteries, power adapters, cables, cameras, toner cartridges, air-conditioning units and associated electrical or electronic components.

These procedures describe both the step-by-step e-waste management procedures and the institutional responsibilities required to ensure safe, accountable, and environmentally sound handling of e-waste. Each organization shall strictly follow the requirements relevant to it.

E-waste shall be managed according to the following hierarchy:

- preventing premature equipment failure through appropriate technical specifications, installation, use and maintenance;
- extending equipment life through maintenance, repair and replacement of defective components;
- reusing or reassigning functional equipment in accordance with MOES asset-management procedures;
- returning defective or end-of-life equipment to the supplier or Original Equipment Manufacturer (OEM) through warranty or take-back arrangements;
- refurbishing equipment or recovering functional components where this can be done safely by an authorized provider;
- recycling and recovering metals, plastics and other usable materials; and
- disposing of only those residual materials that cannot be safely reused, recovered or recycled at an authorized disposal facility.

Equipment shall not be classified as waste solely because it has been removed from service. It shall first be assessed by a competent technician to determine whether it can be safely repaired, refurbished, upgraded or reassigned.

B. Prevention and procurement-stage requirements

E-waste prevention begins during equipment procurement. Technical specifications for ICT equipment shall promote energy efficiency, durability, repairability and compatibility with the electrical conditions at participating schools. Equipment shall have adequate warranties, available replacement parts and access to qualified maintenance and repair services. All ICT and electronic equipment procured under the RBP shall be covered by an OEM take-back program or an equivalent contractually binding end-of-life management arrangement.

MOES will include the following requirements in the procurement documents of all equipment supplied under this project:

- All equipment must carry Energy Star or EPEAT certification, or an internationally equivalent energy-efficiency certification. Submit documentary evidence of certification with the bid.
- All ICT hardware must include automatic power-saving features (e.g., sleep/standby modes, power management firmware).
- Air conditioning units must use only environmentally approved refrigerants with low global warming potential (GWP) and zero ozone depletion potential. Acceptable refrigerants include HFCs, isobutane, or propane (R-290). Refrigerants controlled under the Montreal Protocol (including HCFCs such as R-22) are strictly prohibited.

- Require all equipment to be covered by an Original Equipment Manufacturer (OEM) take-back program, under which the OEM or its authorized representative will accept defective, non-repairable and end-of-life equipment for reuse, recycling or environmentally sound disposal.
- Require the supplier to provide comprehensive warranty coverage for equipment defects, parts and labour for the period specified in the procurement documents.
- Before equipment is shipped, the supplier shall register the supplied equipment under the OEM's product stewardship, take-back or end-of-life recycling programme in the name of MOES, where such a programme is available.
- The supplier shall submit evidence of registration under the OEM programme as part of the equipment handover documentation.
- The supplier shall provide a written summary of the OEM's end-of-life programme for each equipment category.
- The written summary shall identify the programme name, eligibility conditions, the procedure for initiating a return, OEM contact details, and the indicative end-of-life timeframe.
- Where an OEM does not operate a product take-back programme in Uzbekistan, the supplier shall confirm this in writing and identify an appropriately licensed national e-waste service provider capable of handling the relevant equipment category.
- Where no suitable national facility exists, the supplier shall identify an internationally certified e-waste recycler with demonstrated capacity to handle the relevant equipment, subject to Uzbekistan's legal requirements and applicable procedures for transboundary movement of waste.

C. Responsibilities of School Administration

The school director will have overall responsibility for managing ICT equipment and e-waste at the school. A school ICT or asset-management focal person will be designated to carry out the following responsibilities:

1. **Maintain an Equipment Register**. Record the equipment type, make, model, asset number, serial number, installation date, location, condition, and warranty period for all project-financed ICT equipment.
2. **Monitor Equipment Condition**. Periodically inspect equipment and record faults, electrical damage, overheating, broken screens, damaged cables, leaking batteries, and other safety concerns.
3. **Prioritize Maintenance and Repair**. Arrange diagnosis and repair by trained and authorized technicians before classifying equipment as e-waste. Students and untrained school personnel shall not dismantle or repair equipment.
4. **Use Warranty Arrangements**. Report defective equipment covered by warranty to the supplier or authorized service centre. The school will record all equipment and parts returned to the supplier.
5. **Remove Unsafe Equipment from Use**. Immediately disconnect and isolate equipment that presents an electrical, fire, chemical, or physical safety risk. Students shall not be permitted to access damaged equipment.
6. **Maintain Repair and E-Waste Records**. Record the date and nature of each fault, action taken, repair status, warranty return, replacement, final condition, and current location of the equipment.
7. **Provide Safe Temporary Storage**. Store damaged and end-of-life equipment in a designated, locked, and dry indoor area protected from rain, flooding, direct sunlight, theft, and unauthorized access.
8. **Segregate Hazardous and Fragile Items**. Store batteries, cracked displays, leaking toner cartridges, and other hazardous or damaged components separately. Keep displays upright, and protect batteries against short circuits.

9. **Protect Data-Bearing Equipment**. Identify computers and other equipment containing storage media. Back up school data and securely erase it before releasing equipment for recycling or disposal.
10. **Prevent Prohibited Practices**. The school shall not sell, donate, dismantle, break, burn, bury, or discard e-waste. E-waste shall not be placed in ordinary school or municipal waste or transferred to informal collectors.
11. **Transfer Equipment to the Regional Office**. Prepare an inventory of non-repairable and end-of-life equipment and transfer it to the relevant regional MOES office. The inventory will identify the equipment type, make, model, asset or serial number, condition, and quantity.
12. **Document the Handover**. Obtain a signed handover and acceptance record from the regional MOES office and update the school equipment register following transfer.
13. **Report Incidents**. Promptly report battery leakage, fire, smoke, broken displays, toner releases, injury, missing equipment, or unauthorized dismantling or disposal to the regional MOES office.
14. **Maintain Records**. Retain the equipment asset register, maintenance and repair records, warranty documents, e-waste inventory, transfer forms, regional acceptance records, and incident reports.

D. Responsibilities of Regional MOES Offices

The ES focal person of each regional MOES office will have overall responsibility for e-waste received from participating schools. The focal person will carry out the following responsibilities:

1. **Receive Equipment from Schools**. Accept damaged and end-of-life equipment only when accompanied by an inventory and handover form signed by the school.
2. **Verify Received Equipment**. Compare the equipment physically received with the school inventory and record any missing, additional, or damaged items.
3. **Maintain a Regional E-Waste Register**. Record the originating school, equipment type, make, model, asset or serial number, condition, quantity or weight, receipt date, storage location, and final transfer details.
4. **Assess Opportunities for Repair or Reuse**. Where appropriate, arrange a further technical assessment before classifying equipment for recycling or disposal. Return functional or repairable equipment to use or reassign it in accordance with MOES asset-management procedures.
5. **Provide Secure Regional Storage**. Store e-waste in a designated, covered, and locked area with an impervious floor, adequate ventilation, suitable shelving or pallets, and appropriate fire-protection equipment.
6. **Segregate Different Waste Categories**. Store computers and network equipment, displays, batteries and UPS units, printers and toner, cables, air-conditioning equipment, and other specialized waste streams separately.
7. **Control Hazardous Components**. Protect battery terminals, isolate leaking or swollen batteries, keep displays upright, seal toner cartridges, and prevent damage to air-conditioning refrigerant systems.
8. **Restrict Access and Dismantling**. Permit access only to authorized personnel. Do not dismantle, scavenge, sell, or transfer equipment to informal collectors.
9. **Inspect Storage Conditions**. Periodically inspect the storage area for leakage, overheating, fire risk, water damage, unauthorized access, excessive accumulation, and discrepancies between physical stock and the register.
10. **Arrange Timely Collection**. Engage a waste-management service provider before the storage area reaches capacity. Equipment shall not be stored indefinitely.

11. **Verify the Service Provider**. Confirm that the selected provider is legally registered and holds valid licences or authorizations for the required collection, transportation, recycling, and disposal activities.
12. **Confirm Treatment Capacity**. Verify that the provider can manage batteries, displays, circuit boards, toner, refrigerants, data-bearing equipment, and other relevant project waste streams.
13. **Prepare the Outgoing Inventory**. Count or weigh the equipment to be transferred and prepare a waste-transfer manifest identifying its type, quantity, condition, originating location, and destination.
14. **Supervise Loading and Transport**. Confirm that equipment is safely packaged, loaded, and secured. Protect batteries, damaged displays, and leaking equipment separately.
15. **Obtain an Acceptance Certificate**. Obtain a signed certificate from the service provider when it takes custody of the e-waste.
16. **Obtain Final Treatment Records**. Require the service provider to submit records showing the quantities repaired, refurbished, reused, recycled, recovered, and finally disposed of.
17. **Retain Supporting Certificates**. Retain waste-transfer manifests, acceptance certificates, data-destruction certificates, battery treatment records, refrigerant-recovery records, recycling certificates, and final-disposal certificates.
18. **Report to National MOES**. Submit an annual summary identifying the quantities of e-waste received, stored, transferred, repaired, recycled, and disposed of, together with incidents, outstanding issues, and corrective actions.

E. Responsibilities of Waste-Management Service Providers

Only appropriately licensed or authorized waste-management service providers may collect and manage project e-waste. The service provider will have the following responsibilities:

1. **Maintain Valid Authorizations**. Hold and maintain all licences and authorizations required for e-waste collection, transportation, storage, dismantling, recycling, and disposal.
2. **Provide Qualified Personnel**. Use trained workers who understand the hazards associated with batteries, displays, circuit boards, toner, refrigerants, and other electronic components.
3. **Provide Safe Working Conditions**. Provide workers with appropriate tools, PPE, first-aid arrangements, and emergency procedures for handling e-waste.
4. **Use Suitable Vehicles**. Transport e-waste in covered and suitable vehicles that prevent equipment loss, breakage, movement, leakage, and exposure to weather.
5. **Accept E-Waste Through Documented Handover**. Check the consignment against the regional MOES inventory and sign the waste-transfer manifest and acceptance certificate.
6. **Preserve Repair and Reuse Potential**. Handle equipment carefully and assess whether it can be repaired, refurbished, reused, or used for authorized parts recovery before dismantling.
7. **Segregate Waste Streams**. Separate batteries, displays, circuit boards, cables, metals, plastics, toner, refrigerants, oils, and other components requiring different treatment methods.
8. **Manage Batteries Safely**. Prevent short circuits, leakage, crushing, puncturing, and fire. Transfer batteries to facilities authorized to treat the relevant battery type.
9. **Manage Displays Safely**. Prevent screen breakage during collection and transport. Dismantle displays only at facilities with appropriate equipment and trained workers.
10. **Manage Printers and Toner Safely**. Keep cartridges and drums sealed and prevent toner from being released, swept into the air, burned, or discharged to drains.
11. **Recover Refrigerants and Oils**. Recover refrigerants and compressor oils from air-conditioning equipment before dismantling. Do not intentionally release refrigerants to the atmosphere.

12. **Protect School Data**. Securely erase or physically destroy data-bearing equipment and provide a data-erasure or destruction certificate.
13. **Prioritize Recycling and Material Recovery**. Recover metals, circuit boards, cables, plastics, and other reusable materials through documented recycling channels.
14. **Prevent Prohibited Disposal**. E-waste shall not be openly burned, dumped, informally dismantled, disposed of with municipal waste, or sent directly to an ordinary landfill.
15. **Use Authorized Downstream Facilities**. Transfer separated materials and hazardous components only to appropriately authorized treatment, recycling, or final-disposal facilities.
16. **Maintain Chain-of-Custody Records**. Record the quantities received and the quantities repaired, refurbished, reused, recycled, recovered, and finally disposed of.
17. **Provide Completion Documentation**. Submit recycling certificates, data-destruction certificates, refrigerant-recovery records, and final residual-disposal certificates to the regional MOES office.
18. **Report Incidents and Discrepancies**. Promptly notify the regional MOES office of any transport accident, spill, fire, worker injury, equipment loss, unauthorized diversion, or discrepancy in the consignment.
19. **Allow Verification**. Provide MOES and relevant regulatory authorities with access to applicable licences, records, and facilities for monitoring and verification.
20. **Retain Records**. Retain the manifests, acceptance records, treatment records, and downstream certificates for the period required by national law and the service contract.