

SOCIAL SAFEGUARD DUE DILIGENCE REPORT

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SRI: Climate Resilient Sustainable Water Supply and Sanitation Project (CRSWSSP)

Jubilee System Improvement & Transmission line from Jubilee to Colambage Mawatha - CMC Network

Prepared by the National Water Supply and Drainage Board (NWSDB), Government of Sri Lanka for the Asian Development Bank.

CURRENCY EQUIVALENTS

(as of 30 April 2026)

Currency unit - Sri Lanka rupee (LKR)

SLRe1.00 = US \$ 0.00316

\$1.00 = LKR316.68

ABBREVIATIONS

ADB	– Asian Development Bank
CMC	– Colombo Municipal Council
CRSWSSP	– Climate Resilient Sustainable Water Supply Sanitation Project
DI	– ductile iron
DMA	– district metered area
DS area	– Divisional Secretary area
DSD	– Divisional Secretariat Division
EA	– executing agency
EHS	– environment, health, and safety
ESD	– Environmental and Social Division
GCWWMII P	– Greater Colombo Water and Wastewater Management Improvement Investment Program
GN	– Grama Niladhari
GNDs	– Grama Niladhari Divisions
GoSL	– Government of Sri Lanka
GR	– ground reservoir
GRM	– grievance redress mechanism
HHH	– head of household
IA	– Implementing agency
ID	– Irrigation Department
IP	– indigenous people
IR	– involuntary resettlement
LA	– local authority
LAA	– Land Acquisition Act
MC	– municipal council
NIRP	– National Involuntary Resettlement Policy
NSC	– national steering committee
NWSDB	– National Water Supply and Drainage Board
O&M	– operation and maintenance
OIC	– officer-in-charge
OSH	– occupational safety and health
PAP	– project-affected person
PIU	– project implementation unit
PMU	– project management unit

PMSC	– project management and supervision consultant
PRDA	– Provincial Road Development
RDA	– Road Development Authority
RoW	– right-of-way
RP	– resettlement plan
SAR	– subcomponent appraisal report
SPS	– Safeguard Policy Statement
SSAR	– social safeguard assessment report
SSDDR	– social safeguard due diligence report
UDA	– Urban Development Authority
UFW	– unaccounted-for water
WSIP	– Water Supply Improvement Project
WSS	– water supply system
WTP	– water treatment plant

WEIGHTS AND MEASURES

h	– hour
ha	– hectare
km	– kilometer
km²	– square kilometer
kW	– kilowatt
kwh	– Kilowatt-hour
m	– meter
m²	– square meter
m³	– cubic meter
m³/day	– cubic meters per day
m³/h	– cubic meters per hour
mm	– millimeter

NOTES

- (i) The fiscal year (FY) of the Government of Sri Lanka and its agencies ends on 31 December. "FY" before a calendar year denotes the year in which the fiscal year ends, e.g., FY2026 ends on 31 December 2026.
- (ii) In this report, "\$" refers to United States dollars.

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1. INTRODUCTION

1. Sri Lanka's Sustainable Development Goal (SDG) targets for water and sanitation (SDG 6) prioritize the achievement of universal access to safe drinking water and sanitation, the improvement of water quality through pollution reduction, enhanced water-use efficiency, and the implementation of integrated water resources management. Sustainable Development Goal 6.1 aims to ensure universal and equitable access to safe and affordable drinking water for all by 2030, while Goal 6.2 focuses on achieving adequate and equitable access to sanitation and hygiene for all.

2. In alignment with these global commitments, Sri Lanka has revised its national objectives to achieve 100 percent coverage in the provision of safe drinking water to the entire population by 2030 and to end open defecation while ensuring that women, girls, and vulnerable groups have access to adequate sanitation and hygiene. This commitment underscores the country's recognition of water as a fundamental human right and reflects its dedication to ensuring water security and health equity for all citizens.

3. In the last five decades, successive governments of Sri Lanka have made several attempts to resolve the drinking water issues in urban, rural, and estate sectors. The Asian Development Bank (ADB) and the Government of Sri Lanka (GoSL) are working in close partnership to address drinking water supply challenges by financing and implementing projects that expand safe water access to urban, rural, and estate sectors, upgrade aging infrastructure, and strengthen water sector institutions. Through concessional loans, technical assistance, and policy support, ADB helps GoSL improve water treatment, reduce losses, and extend reliable services to urban and rural communities, contributing to public health, climate resilience, and inclusive development across the country.

4. During the last few years, ADB, the main funding agency for the water supply sector in Sri Lanka, has been working hand in hand with the GoSL to improve the efficiency and financial sustainability of the water supply and wastewater management services in Colombo. Accordingly, the ADB-financed Greater Colombo Water and Wastewater Management Improvement Investment Program (GCWWMIIP) was aimed at reducing the non-revenue water (NRW) by replacing the city's aging water supply network. This project covered only part of the Greater Colombo area due to financial limitations, but this attempt has improved the quality of life for a large number of residents in the Greater Colombo area, including women, young girls, and the poor, who secured more time for productive activities and studies and enjoyed leisure due to a 24-hour water supply.

5. The Climate Resilient Sustainable Water Supply and Sanitation Project (CRSWSSP) has been planned with two outputs: (i) Reliable, sustainable, inclusive, and safe water supply systems in the Southern and Western Provinces were established, and (ii) Sustainable, inclusive, and safe sanitation systems in the Northern Province were developed.¹ The planned outcome of the project is to accomplish safety, reliability, resilience, coverage, and inclusiveness of water supply services in two provinces and sanitation services in one province improved by 2032. The CRSWSSP will aim at achieving the above outputs through (i) promoting efficient use of resources by District Management Area (DMA) management and Non-Revenue Water (NRW) reduction, (ii) expanding the existing distribution network in certain unserved areas in Western and Southern provinces with the construction of new hub reservoirs and towers; and (iii)

¹ Project Concept Note

improving the level of service by enhancing the existing production capacities at Lunugamwehera Water Treatment Plant and Ambatale Intake coupled with new and improved Transmission and Distribution Mains; and (iv) a sanitation improvement component for the Jaffna region, initially covering Jaffna city, with a Waste Water Treatment Plant, several pumping stations, and transmission lines.

6. Five subcomponents have been proposed under the CRSWSSP, namely (i) the Lunugamvehera Integrated Water Supply Project, (ii) Jubilee System Improvements, (iii) Kolonnawa Distribution System Improvement, (iv) Ambatale Intake Improvement, and (v) Jaffna Sanitation Component.

7. Jubilee system improvement has been identified as one of the priority projects under CRSWSSP to address present service level issues in and around Kotte and Maharagama areas and provide water to the Colombo Municipal Council (CMC) service area to address potential water stress in the future and to improve the service levels.

8. Initial involuntary resettlement and indigenous peoples safeguard screening of this subcomponent's activities (discussed under chapter 2) confirmed that the proposed subcomponent shall not involve any physical or economic displacement within the scope of ADB's Safeguard Policy Statement (SPS, 2009) (even temporarily). However, there can be some temporary disturbances to the communities and road users along the proposed pipeline works. This Social Safeguard Due Diligence Report (SSDDR) is prepared for the Jubilee System improvement sub-project.

A. Objectives of the Subcomponent (Jubilee System Improvement)

9. The Western Province Metropolitan Area Water Supply Master Plan Update (2013), carried out with the assistance of the Japan International Cooperation Agency (JICA), has estimated the future water demand for the project area with 5-year intervals up to the year 2040. As per the Feasibility Report prepared for the Jubilee system development and submitted to the subcomponent Appraisal Committee in November 2017, the extracted subcomponent objectives are as follows:

10. The main objective of the Jubilee subcomponent is to increase the service level for providing a safe and continuous water supply at sufficient pressure to all customers within the Jubilee and Kotte subcomponent area. This objective will be achieved through the following measures:

- Enhancing and maintaining the storage capacities of the Jubilee system for at least 7 hours,
- Constructing and feeding a new treated water transmission line from Ambatale to the Jubilee system and feeder transmission from Jubilee to the CMC area,
- Capacity building of the O&M setup of NWSDB Kotte operations, and
- Energy saving, to provide sustainable and safe drinking water, ensuring total user satisfaction.

B. Objective and Methodology Used for the Social Safeguard Due Diligence Report

11. The Social Safeguard Assessment Report (SSAR) prepared in 2021 for the Jubilee System development covered construction activities confined to the existing NWSDB premises. The assessment included the following three components: (i) Construction of a 10,000 m³ ground reservoir on vacant land; (ii) Construction of a pump house and OIC office on vacant land; and (iii) Construction of a 6,000 m³ ground reservoir within the National Water Supply and Drainage Board (NWSDB) Kotte Office premises.

12. Accordingly, the Jubilee subcomponent initially focused on improvements to the headworks facilities of the NWSDB Jubilee Office, including enhancements to the monitoring and control systems of headworks operations. All related civil works were planned within land owned by the NWSDB.

13. As the construction activities were confined to NWSDB-owned land, the 2021 SSAR primarily addressed potential social impacts associated with works within these premises. No significant social impacts were anticipated in relation to the proposed 3.5 km feeder transmission main from the Jubilee Reservoir to the Colombo Municipal Council (CMC) boundary at Colabage Mawatha, as the pipeline was to be laid within existing public road rights-of-way.

14. In 2026, the scope of the subcomponent was further expanded to include the main transmission line from Ambatale to the Jubilee Reservoir under the Jubilee System Development subcomponent. Although this expansion was not expected to generate significant adverse social impacts, a social assessment was undertaken to cover all additional components, ensuring that any potential social safeguard issues arising from the extended scope were properly identified and addressed.

1. Objectives of the Social Safeguard Due Diligence Report

15. Accordingly, identify the main objectives of the Social Safeguard Assessment and Initial Due Diligence Report (SSDDR) are to (a) identify potential social constraints and impacts associated with the subcomponent ; (b) engage all relevant stakeholders in an inclusive manner to identify potential social impacts, such as temporary livelihood disruptions and construction-related inconveniences, and to propose appropriate mitigation measures; (c) recognize social diversity and address issues relating to vulnerable and marginalized groups; (d) ensure the participation of poor, disadvantaged, and weaker segments of the community in the consultation process; and (e) recommend measures to avoid, minimize, or mitigate adverse social impacts, enhance positive outcomes, and strengthen the overall subcomponent implementation process.

2. Methodology of the Social Safeguard Due Diligence Report

16. The SSDDR builds upon and updates the Social Safeguard Assessment conducted in 2021. The present assessment has been carried out in accordance with the social safeguard policies and legal framework of the Government of Sri Lanka, as well as the applicable guidelines of ADB. The methodology adopted for the SSDDR included the following activities:

- A joint field visit with the NWSDB Planning Team during October 2025 to identify areas covered under the treated water transmission pipeline alignment from Ambatale to Jubilee.

- A joint field visit with the NWSDB Planning Team in January 2026 to identify areas covered under the treated water transmission pipeline alignment from Jubilee to the CMC boundary at Colambage Mawatha.
- Transect walks were conducted in January 2026 along the feeder main from Jubilee to the CMC boundary at Colambage Mawatha to identify and assess potential social safeguard issues and implementation constraints.
- Interview with the households living on the roads where the main transmission is installed from Jubilee to Colambage Mawatha

2. PROJECT DESCRIPTION

A. Jubilee System Improvement Subcomponent

17. The Western Province Metropolitan Area Water Supply Master Plan Update (2013), carried out with the assistance of the Japan International Corporation Agency (JICA), has estimated the future water demand for the subcomponent area with 5-year intervals up to the year 2040.

18. Accordingly, headwork improvements, additional storage requirements, transmission, and distribution improvements have been identified to cater to the needs at the design horizon. The CMC area distribution system has been divided into four principal zones around each one of the available main reservoirs within the integrated network, namely Elie House, Maligakanda, Gothatuwa, and Jubilee. Besides, the CMC area is further subdivided into 75 DMAs, and each DMA will have a dedicated feeder main, out of which 19 DMAs will be fed by Jubilee Reservoir (Jubilee CMC Zone) and thereby concerns on Jubilee system improvements have become a priority.

19. Along with the Jubilee supply network, part of the Sri Jayewardenepura-Kotte Municipal Council area and Maharagama Municipal Council area will also be served by the Jubilee system improvement subcomponent (Jubilee Kotte Zone). The Jubilee Kotte Zone will be subdivided into sixteen DMAs, and the total design demand in 2040 is estimated at 50,871 m³/day. To ensure sustainable, continuous pipe-borne water facilities to cater to the anticipated design demand, it has been identified that enhancement of Jubilee storage facilities, as well as improvements to existing transmission and distribution networks, are paramount.

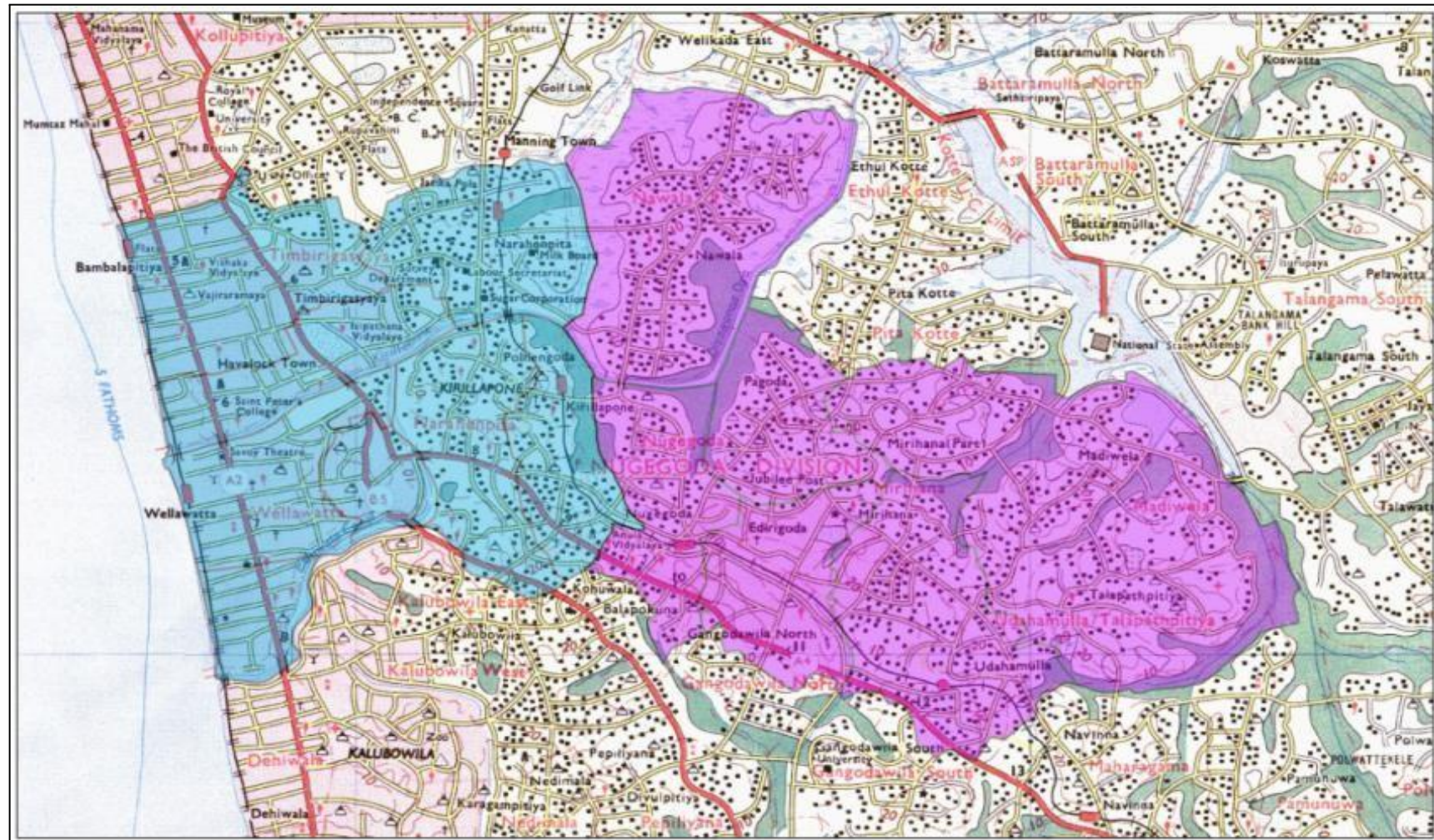
B. Beneficiary Areas of Jubilee System Improvements

20. The beneficiary areas of the proposed Jubilee system improvements include Kotte Municipal Council (MC) and Maharagama MC, CMC, in the Western Province of Sri Lanka. The Colombo Municipal Council area, being the main city, is considered the commercial hub of the country. It is divided into two divisional secretariat areas, namely Colombo and Thimbirigasyaya, having 35 Grama Niladri Divisions (GNDs) & 20 GNDs, respectively. The Jubilee-CMC Zone includes 10 GNDs within the Thimbirigasyaya Divisional Secretariat Area.

21. The Kotte Zone, supplied by the Jubilee system, is located adjacent to the south-east boundary of the Colombo Municipal Council area, and it includes 21 GNDs belonging to Sri Jayewardenepura Kotte MC, Maharagama UC, and 02 GNDs of Dehiwala-Mt. Lavinia MC.

22. It is expected that the demand for water within Jubilee CMC Zone and Jubilee Kotte Zone (Figure 1) will be satisfied as a result of implementing the proposed project. The Jubilee reservoir service area covers 1,907 hectares, as shown in Figure 2.1 below.

23. The location map of the Jubilee waterworks is shown in Figure 2.2.



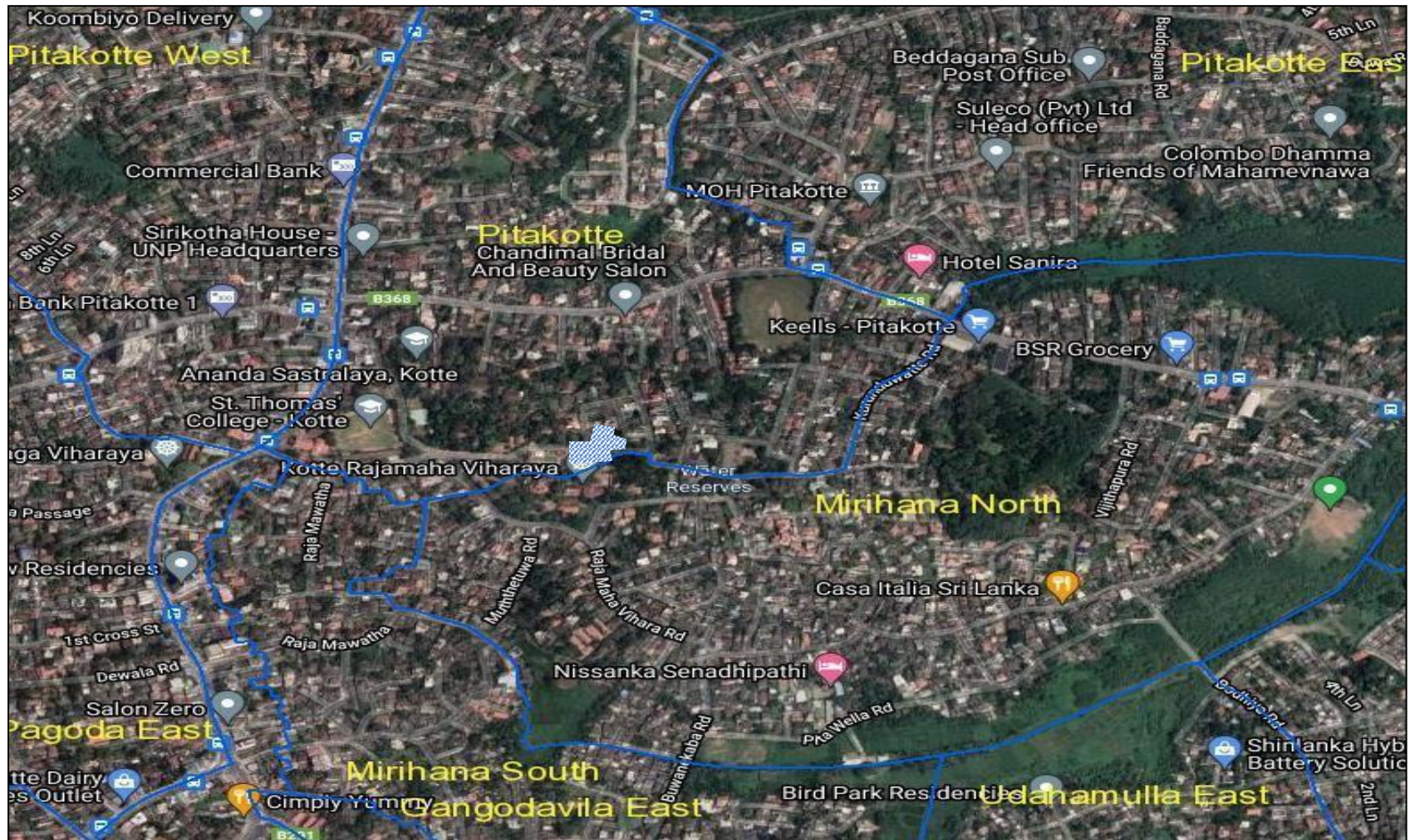


Figure 2.2: The Location Waterworks

C. Justification of the System Improvements in the Jubilee System

24. The Jubilee service area was identified as a priority region in the Western Province Metropolitan Area Water Supply Master Plan Update Study (JICA, 2013), as it serves the southern part of the Colombo Municipal Council (CMC) area and Sri Jayewardenepura Kotte MC. At present, the Jubilee service area covers parts of the CMC–South, Sri Jayewardenepura Kotte, and Maharagama distribution zones.

25. There are two existing reinforced concrete service reservoirs at the NWSDB-operated Jubilee site, with capacities of 11,400 m³ and 4,500 m³, which are approximately 20 years and 35 years old, respectively. Water is supplied to the system through an existing 1,100 mm diameter transmission main from the Ambatale Water Treatment Plant (WTP) at a flow rate of 6,000 m³/h. Of this, 1,550 m³/h is diverted to the Battaramulla system, while the remaining 4,450 m³/h is conveyed to the Jubilee system. The Jubilee reservoirs provide gravity supply to parts of the CMC area (2,200 m³/h) and to the Maharagama reservoirs (800 m³/h). The Kotte area is currently served through a combination of direct pumping and supply via the Mirihana Tower (1,450 m³/h) in Figure 2.3.

26. According to the water balance forecast of the Master Plan up to the year 2040, the Jubilee system will serve 10 Grama Niladhari Divisions (GNDs) within the CMC area (Jubilee–CMC Zone) and 21 GNDs within the Sri Jayewardenepura Kotte and Maharagama Divisional Secretariat areas (Jubilee–Kotte Zone). The Battaramulla and Maharagama distribution zones, which are currently supplied through the Jubilee system, are planned to be transferred to the proposed Weliwita system upon the commissioning of the Weliwita Water Treatment Plant and the subsequent reorientation of the transmission networks, in accordance with the Master Plan recommendations.

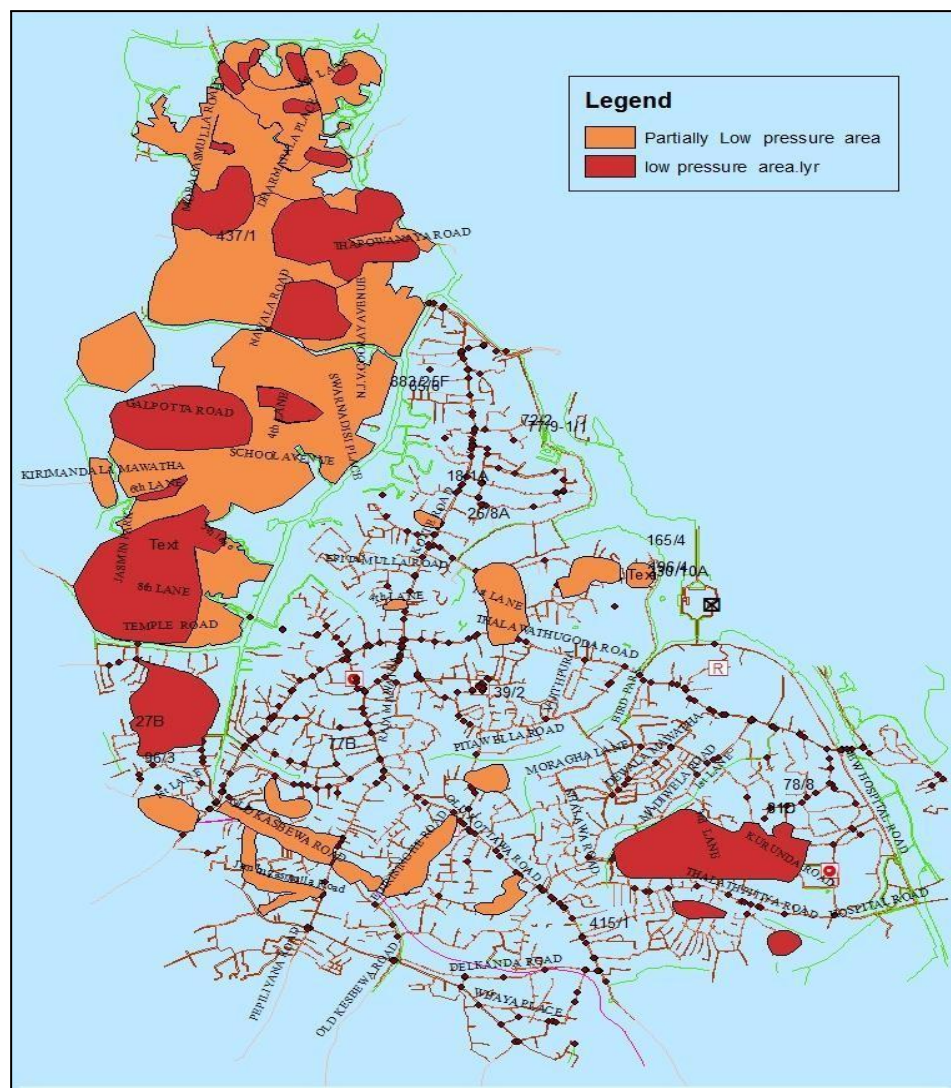
27. At present, the existing reservoir storage capacity is sufficient to meet only approximately four hours of system demand. This limited storage has resulted in frequent social inconveniences during unexpected system failures. During peak demand periods, reservoir water levels drop significantly, leading to the formation of low-pressure zones within the distribution network (Figure 2.4, NWSDB Information). In certain instances, pumping operations are required to be suspended due to critically low reservoir water levels.

28. In view of these constraints, it is proposed under the present subcomponent to dedicate the Jubilee reservoirs exclusively to the Jubilee–CMC and Jubilee–Kotte Zones as a key conceptual design feature, taking into account demand projections up to the design horizon year of 2040. Accordingly, the direct distribution demand from the Jubilee reservoirs is projected to increase to 128,400 m³/day (5,350 m³/h) by 2040. Under this scenario, the existing total storage capacity of 15,900 m³ would be sufficient to support system operation for only about three hours, resulting in serious operational challenges in maintaining adequate reservoir levels, particularly during peak demand periods. These challenges are expected to intensify progressively from 2025 onwards as demand continues to increase. Therefore, enhancement of storage capacity is considered an absolute necessity for the Jubilee system.

29. Considering the critical need for system capacity enhancement and service reliability, improvements to the Jubilee system have been identified as a high-priority subcomponent for implementation under the proposed urban development initiatives.



Figure 2.3: Two Existing Reinforced Concrete Storage Reservoirs (a and b)



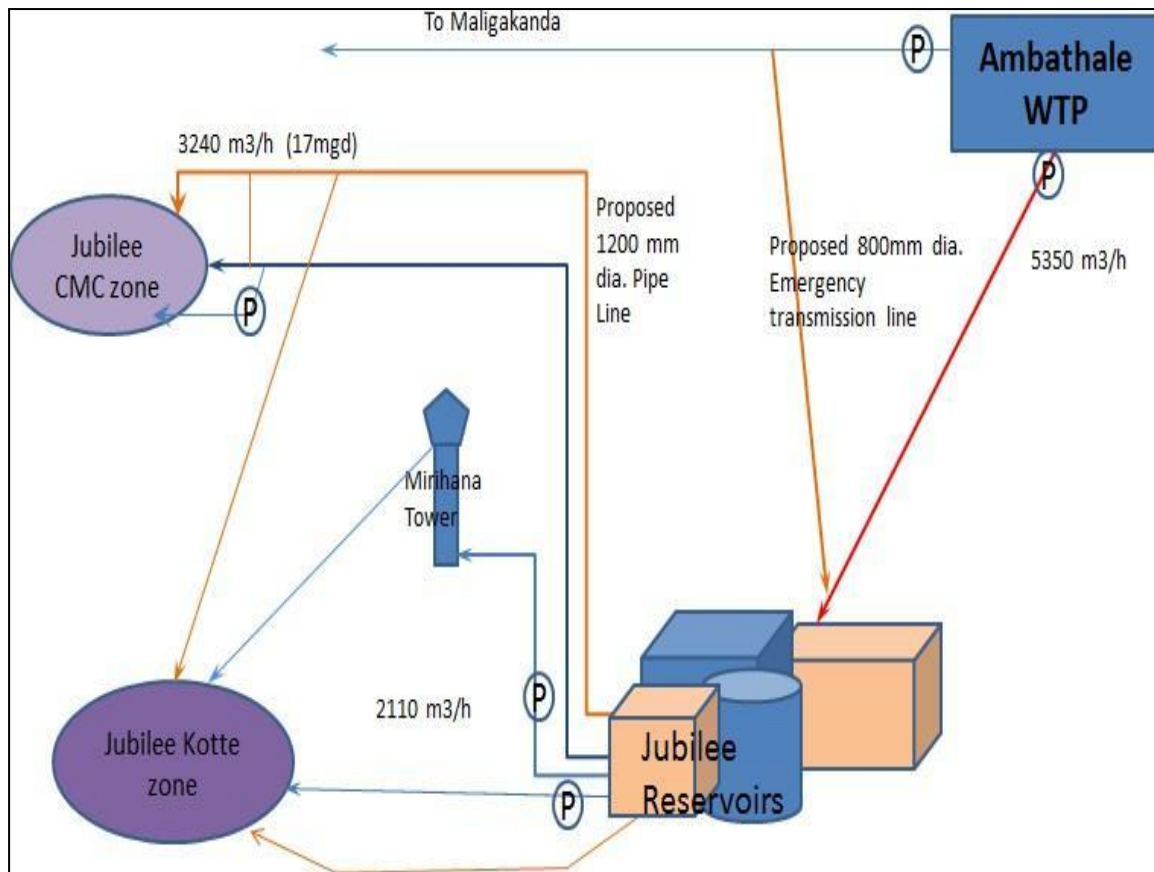


Figure 2.5: Proposed Transmission Modifications as per the Master Plan

D. Subcomponent Scope of Work -Jubilee System Improvements

30. As per the Feasibility study conducted in 2017, the proposed system improvements/scope of work involves:

- Construction of new ground reservoirs with capacities of 10,000 m³ and 6,000 m³
- Construction of new OIC Office & Pump House at the Jubilee premises since the existing facilities are in poor condition and do not match with the new development.
- Construction of Operator & EA grade Quarters (Total floor area 700 m²). This is to substitute for the demolishing of existing quarters to make clearance for a new reservoir
- Supply & Installation of Pumps - 02 pumps (31 kW) and 03 pumps with (35 kW)
- Installation of 1200/900mm diameter ductile iron (DI) pipeline - distance 3.5 km of which 3 km, 1200mm DI pipes and 0.5 km 900mm for the transmission of water from Ground Reservoir at Jubilee Water Supply System to the Colombo Municipal Council (CMC) boundary along D M Colambage Mawatha
- Installation of 1100mm diameter ductile iron (DI) pipeline – distance 12.3km for the transmission of water from Ambatale WTP to the Jubilee reservoir
- Renewable Energy Generation: By installing solar panels approximately 1,200 kWh per day can be produced and the capital cost incur for the installation of

solar on the reservoir can be recovered within 58 months of the simple payback period.



Figure 2.6: Locations of Existing Structures and Proposed Structures



(a)



(b)

Figure 2.7: The Existing Pump House and Site for the New Pump House (a and b)

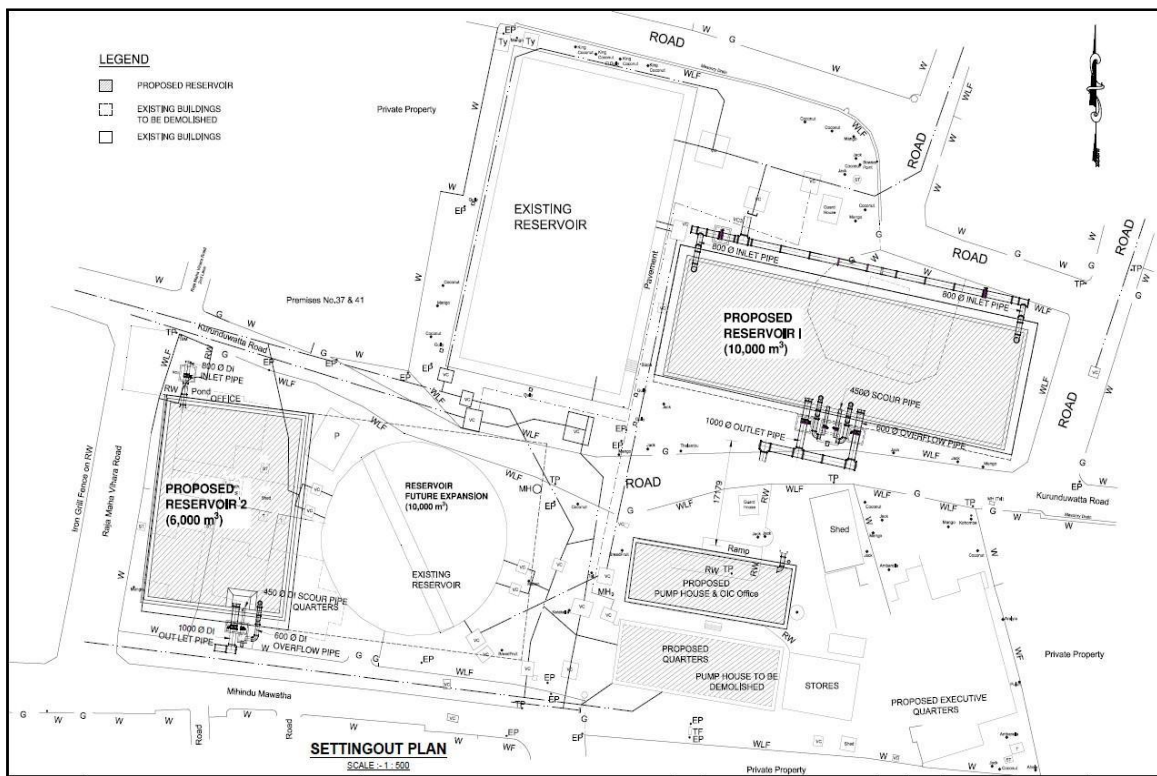


(a)

(b)

Figure 2.8: The Site for the both New 6,000 m³ and 10,000 m³ Reservoirs (a and b)

Figure 2.9: Setting Out Plan of the Proposed Improvement in the Jubilee System



E. Pipe Alignment from Jubilee to Colambage Mawatha (CMC Area)

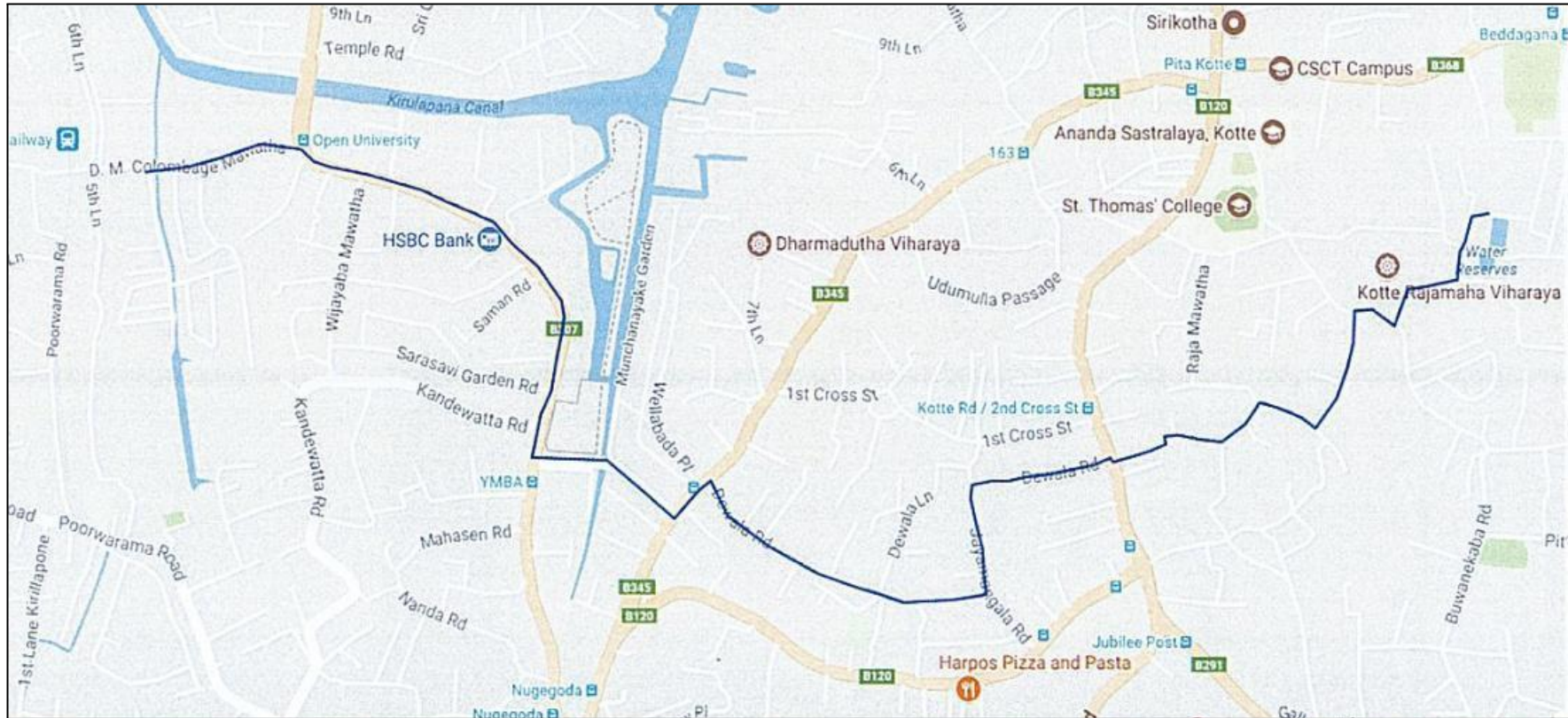
31. Transmission of water from the ground reservoir at the Jubilee Water Supply Scheme (WSS), located adjacent to Kotte Raja Maha Viharaya, to the Colombo Municipal Council (CMC) boundary along D. M. Colambage Mawatha.

32. The road sections along the proposed 3.5 km pipe route are as follows: Jubilee GR, Mihindu Mawatha, Raja Maha Vihara Road, Muttetuwe Road, Raja Mawatha, Kotte Road (crossing Dewala Lane), Jaya Mangala Road, Dewala Road, Pagoda Road, Chandra De Silva Road, Nawala Road, and Colambage Mawatha.

33. The pipe alignment passes through highly built-up areas within the project zone. All major public roads are owned by the RDA and PRDA, while residential roads are owned by the respective Municipal Councils. The characteristics of the roads along the 3.5 km pipe alignment are presented in Table 2.1 below

Table 2.1: Pipe Alignment Route from Jubilee System to Colambage Mawatha

Road Names of the Pipe Alignment Route	Type (Characteristics)
Mihindu Mawatha - Rajamaha Vihara Road	Residential
Rajam Vihara Road - up to Muttetuwe Road	Residential
Muttetuwe Road - up to Mahawatta Road	Residential
Mahawatta Road - up to Raja Mawatha	Residential
Raja Mawatha - up to Mirihana pita Kotte Road	Residential
Devala lane - up to Jaya Mangala Road	Residential
Jaya Mangala Road - up to Devala Road	Residential
Devala Road - Pagoda Road	Residential
Pagoda Road - up to Chandra Silva Mawatha	Commercial
Chandra Silva Mawatha - up to Nawala Road	Neither a residential nor a commercial
Nawala Road - up to Colambage Mawatha	Commercial
Colambage Mawatha - up to CMC Boundary	Neither a residential nor a commercial



F. Estimated Capital Cost and O&M Cost of the Sub-Project

34. Based on the feasibility reports, the estimated capital cost of the subcomponent is LKR8,627 million (\$56.3 million). The projected operation and maintenance (O&M) cost for the design horizon is estimated at SLRs28.00 per unit. This estimate includes pumping costs and routine maintenance of the Jubilee waterworks, covering personnel costs, utility expenses, and repair and maintenance requirements.

G. Benefits of the Proposed Activity

35. The Western Province Metropolitan Area Water Supply Master Plan, 2013, outlines the long-term expansion strategy for water transmission, distribution networks, and storage facilities in the Western Province. The Jubilee System Improvement will benefit all consumers within the NWSDB supply areas of Sri Jayewardenepura Kotte Municipal Council (SJKMC) within the Sri Jayewardenepura Kotte Divisional Secretariat Division (DSD); (ii) Colombo Municipal Council (CMC) wards within Thimbirigasyaya DSD; and (iii) Maharagama DSD, including the Maharagama Municipal Council (MC) area.

36. With the proposed improvements, continuous and reliable water supply to these service areas will be ensured, even during periods of extreme drought. The provision of an additional 18,855 new connections will increase access to piped water supply. The resulting benefits include:

- Increased water consumption and improved service coverage;
- Time savings for households;
- Improved reliability and continuity of supply; and
- Reduced household expenditure on alternative water storage and coping mechanisms.
- These outcomes collectively represent the key economic and social benefits of the project.

3. SOCIAL SCREENING AND CATEGORIZATION

A. Policy and Legal Framework

37. The social safeguards for the project are guided by the Asian Development Bank (ADB) Safeguard Policy Statement (SPS, 2009), which outlines mandatory requirements for Involuntary Resettlement (IR) and Indigenous Peoples (IP). Out of the 12 policy principles on involuntary resettlement and 9 policy principles of indigenous peoples, the following policy principles are relevant to the proposed Jubilee System improvement works.

38. **Involuntary Resettlement - Policy Principle 1 (PP1).** Screen the project at an early stage to identify past, present, and potential future involuntary resettlement impacts and risks. Determine the scope of resettlement planning through surveys and/or a census of displaced persons, including a gender analysis related to anticipated impacts.

39. **Involuntary Resettlement - Policy Principle 2 (PP2).** Conduct meaningful consultations with affected persons, host communities, and relevant civil society organizations. Inform displaced persons of their entitlements and resettlement options, and ensure their participation in planning, implementation, and monitoring of resettlement activities. Pay special attention to the needs of vulnerable groups, including women, the poor, the elderly, children, landless persons, Indigenous Peoples, and those without legal land titles. Establish a functional grievance redress mechanism (GRM). Support the social and cultural institutions of displaced and host communities. In projects with complex or sensitive IR impacts, undertake a social preparation phase before finalizing compensation and resettlement measures.

40. **Indigenous Peoples - Policy Principle 1 (IP PP1).** Screen the project early to (i) confirm whether Indigenous Peoples are present in, or have a collective attachment to, the project area and (ii) assess whether the project is likely to affect them positively or negatively. Indigenous Peoples' rights, including those of the Vedda community, are protected under national legislation and aligned with ADB safeguards.

41. The National Involuntary Resettlement Policy (NIRP) is consistent with ADB SPS (2009), and both are fully applicable to the project. This Social Safeguard Assessment has been conducted under the guidelines of the social safeguard policy and legal framework of Sri Lanka, as well as the ADB.

B. Categorization

42. All proposed subcomponent building structures will be located on NWSDB-owned lands. Hence, the proposed project's footprints are free of residential or any other private use. The land belongs to NWSDB, and some office buildings are located inside the land proposed for headworks improvement. There is no need to demolish these existing buildings, but during the construction stage, the staff of the NWSDB buildings will have to be temporarily shifted to another office building nearby. A building used for the Kotte office and its parking area, the pump house, and the OIC office are located within the 160 perch large land plot. Details of the subcomponent footprint and its vicinity are presented in Figures 2.7, 2.8, and 2.9.

43. The main treated water transmissions indicated above will follow the existing road corridors under the jurisdiction of the RDA, PRDA, and local authorities. Since the main roads are free from wayside businesses and encroachments, there are no

residential or commercial structures within the pipe alignments within road shoulders, and therefore, no physical displacement will occur.

44. The laying of transmission pipes along the by-lanes will create some temporary issues as these by-lanes are generally narrow and have no road shoulders, and as a result, the transmission lines will be laid in the middle of these narrow roads.

45. Screening also confirms that no Indigenous Peoples (IP) reside in or have a collective attachment to the project area, and no marginalized or vulnerable communities have been identified. As a result, no Category A or Category B level involuntary resettlement impacts are expected. The IR and IP screening checklists are presented as Appendices 1 and 2 of this report.

46. There is minimal risk of damage to residential structures during pipe-laying activities. Although a few roads within the subcomponent area are relatively narrow, they are generally about 15 feet wide or slightly more, which provides sufficient working space for construction activities. The surrounding houses are predominantly owned by middle- and upper-middle-income residents, and there is no risk of damage to residential structures during pipelaying activities. However, minor and temporary disturbances may occur during construction activities, as outlined below:

- Restriction of vehicular movements on narrow roads,
- Restriction on the roadside parking of vehicles by residents,
- Disconnection or damage to other services such as telephone lines and electricity supply
- Restriction to access by other service providers who visit the areas to restore
- the above services
- Restriction to access by para-medical groups/ambulance to emergencies

47. These impacts are temporary, involve no income loss, and will be mitigated through proper scheduling, access management, and stakeholder communication. Based on the screening results and in accordance with ADB SPS (2009), this subcomponent is classified as a Category C project for social safeguards, as no involuntary resettlement or Indigenous Peoples impacts are anticipated.

4. SOCIO-ECONOMIC STATUS OF THE SUBCOMPONENT AREA

48. The socioeconomic conditions of the subcomponent area were assessed using secondary data obtained from the respective Divisional Secretariats. These data, compiled annually as part of the Divisional Resource Profile, are considered reasonably reliable and are widely used by planners for development and project assessments.

A. Housing and Population

49. Demographic information for the subcomponent area is presented in Table 4.1 below to provide an overview of the beneficiary population directly or indirectly. This data are compiled annually as part of the Divisional Resource Profile and are considered to be reliable. In 2021, the total population in the Kotte area was counted as 118,854 (SSR, 2021), and it increased to 119,381, an increase of less than 1%. This means that the population in the area has reached a saturation level.

Table 4.1: Demographic Details of Beneficiary DSDs

DSD	Housing Units	Total HHs	Population	Area Sq KM	Pop. Density
Kotte	24,833	29,712	119,381	17.33	7,022
Maharagama	52,505	54,774	214,404	39.4	5,442
Thimbirigasyaya	52,626	63,448	253,786	22.23	11,536
Total	129,964	147,934	253,786	78.96	12,475

Source: Resource profiles of Kotte (2024), Maharagama (2024), and Thimbirigasyaya (2023).

B. Gender Differences

50. Table 4.2 below presents the total population in the proposed subcomponent area, disaggregated by gender. The female population is slightly higher than the male population in the subcomponent areas, which is consistent with the national demographic trend.

Table 4.2: Gender Disaggregated Data by DSDs in the Subcomponent Area

DSD	Male	Female	Total Population	Total HH	Women HHH
Kotte	56,358	63,023	119,381	29,712	119
Maharagama	101,365	113,139	214,404	54,774	1,120
Thimbirigasyaya	105,978	111,140	253,786	63,448	1,173
Total	263,711	287,302	253,786	147,934	2,412

Source: Resource profiles of Kotte (2024), Maharagama (2024), and Thimbirigasyaya (2023).

50. The data indicate that women-headed households account for approximately 2% of households in the subcomponent area, which is relatively low compared to rural areas. This suggests that the risk of household vulnerability due to loss of male income earners is generally lower in urban areas than in rural settings, largely due to differing socioeconomic conditions. In rural areas, men are more frequently exposed to employment insecurity, wildlife-related risks (such as snake bites and encounters with elephants), and natural hazards, including lightning strikes. In contrast, urban

populations typically have access to a wider range of employment opportunities with comparatively lower occupational risks.

C. Employment

51. According to the data of Divisional Resource Profiles, in overall, 50.5% (133,334) of women and 49.5% (130,726) of men in the subcomponent area are employed across various occupational sectors. Among employed women, the majority are engaged in the government sector, private sector employment, and unskilled labor services, while comparatively fewer women are employed in industrial and service sectors than their male counterparts. In terms of self-employment, women account for a relatively higher share, representing approximately 56.8% of the total self-employed population. Data indicates that unemployment, among women in the subcomponent area, is slightly higher than that of men, with 12,795 unemployed women compared to 8,500 men. The employment and unemployment of women in the subcomponent areas are presented in Table 4.3 below.

Table 4.3: Women's Employment by Occupation in the Subcomponent Area

Employment Category	DS Divisions			Total
	Kotte	Maharagama	Thimbirigasyaya	
Government	15.0%	17.7%	15.3%	16.3%
Private Sector	24.6%	34.2%	40.1%	32.6%
Agriculture Sector	0.2%	1.1%	0.0%	0.5%
Industrial Sector	2.7%	2.7%	0.0%	2.1%
Service Sector	18.8%	7.2%	5.6%	10.4%
Self- Employment	5.5%	10.2%	0.0%	6.3%
Skilled Labour	4.9%	5.1%	33.7%	11.9%
Foreign Employment	4.3%	3.9%	5.3%	4.3%
Unskilled labour	10.2%	10.9%	0.0%	8.1%
Unemployed	13.6%	7.1%	0.0%	7.4%
Total	100%	100%	100%	100%

Sources: Kotte Divisional Secretariat (2024); Maharagama Divisional Secretariat (2024); and Thimbirigasyaya Divisional Secretariat (2023).

D. Income and Poverty

52. For the year 2024, the Government of Sri Lanka (GoSL) has declared the official poverty line for the Colombo District is at SLR17,600. However, it is important to note that due to the rapid rise in inflation and the overall cost of living, the practical or experiential level of poverty faced by many households is significantly higher than the officially declared threshold.

53. Household income levels vary significantly among the three DS divisions. In Kotte and Thimbirigasyaya, the percentage of households in the “poorest of the poor” category is less than 1%, whereas in Maharagama it is 1.3%. In Kotte, 67% of households fall into the high-income category, while in Thimbirigasyaya and Maharagama the proportions are 34% and 42%, respectively. The relatively lower share of high-income households in Thimbirigasyaya is due to a substantial number of residents living in densely populated pockets along canals, railway lines, and government lands. Some of these households reside in semi-permanent structures.

54. Within the subcomponent area, 33% of households live in poverty, with declared incomes of less than LKR 15,000 per month, indicating a relatively high level of economic vulnerability. Among these, 3.8% earn less than LKR 5,000 per month, suggesting a heavy reliance on government financial assistance and informal employment. However, declared household incomes may be underreported in order to qualify for government assistance and other subsidies targeted at low-income groups. In contrast, household income levels in Kotte are generally higher, reflecting better employment opportunities and stronger engagement in the urban service economy.

Table 4.4: Income category of the households in the project implementing area²

DS Division	<3000	3001-5000	5001-10000	10001-15000	15001-25000	>25001
Kotte	0.2%	0.7%	3.4%	9.2%	19.7%	66.7%
Maharagama	1.3%	3.2%	8.8%	21.1%	23.1%	42.4%
Thimbirigasyaya	0.9%	3.5%	12.8%	22.0%	26.4%	34.5%
Total	0.9%	2.9%	9.6%	19.4%	23.9%	43.3%

Sources: Kotte Divisional Secretariat (2024); Maharagama Divisional Secretariat (2024); and Thimbirigasyaya Divisional Secretariat (2023).

55. The government continues to implement a new welfare program known as "Aswesuma," which provides financial assistance to ensure the basic needs of households in the lowest income categories. The program has four components, offering financial assistance of LKR 15,000 (for severely poor households), LKR 8,500 (for poor households), LKR 5,000 (for vulnerable households), and LKR 2,500 (for transient households), based on household income levels. If a household has fewer than two members, only half of the subsidy is paid.

56. The overall objective of the "Aswesuma" program is to provide temporary financial support until beneficiaries are capable of moving beyond dependency on subsidies. To this end, livelihood guidance, vocational training, and skill development assistance are provided by the Divisional Secretariat. The selection of beneficiaries is carried out by a committee appointed by the GoSL for each Divisional Secretariat Division (DSD).

Table 4.5: Poverty and Government Financial Assistance (Aswesuma Recipients)

Name of DSD	No. of "Aswesuma" Recipient HHs by Eligibility Categories					Total HHs in Subcomponent Area	Percentage of HH on Subsidies
	Sever Poor - SLR15,000	Poor - SLR8,500	Vulnerable - SLR5,000	Transit -SLR2,500	Total		
Kotte	686	486	681	2,070	3,923	29,712	13.2%
Maharagama	889	660	881	2,656	5,086	54,774	9.3%
Thimbirigasyaya	1,465	1,154	1,545	4,573	8,737	63,448	13.8%
Total	3,040	2,300	3,107	9,299	17,746	147,934	12.0%

Source: Department of Samurdhi Development. 2025. Livelihood and Community Empowerment Progress Report 2025. Colombo: Government of Sri Lanka.

57. As per the data in Table 4.5, overall, 12% of HHs in the subcomponent areas live on government subsidies, which is low compared to other districts. Among the households receiving assistance under the Aswesuma program, the number of HHs falls

² Income data of some GNDs are not reported and as a result the number of HHs with previous tables are not matched

within the “poor” or “severely poor” categories, accounting for less than half (30%) of all recipients, 5,340 out of a total of 17,746 households.

5. IMPACT ASSESSMENT

58. All land required for construction of relevant structures is owned by the NWSDB; therefore, no private land acquisition is required, and the subcomponent will not affect any privately owned properties. The pipeline alignments are properties of RDA, PRDA, and the respective municipal councils of the subcomponent area. Overall, no adverse physical or economic displacement is anticipated as a result of subcomponent implementation. However, temporary disruptions may occur for pedestrians and motorists due to trench excavation along road shoulders and at road junctions.

59. Only temporary inconvenience is anticipated during pipe installation along the comparatively narrow roads (around 15 to 20-foot roads), all of which are connected to public roads at both ends. Since the residents are representing the middle or upper middle class and their houses are solidly constructed ones. Hence, there is no possibility to damage these houses, and relocations of families during construction will not occur. If any minor damages occurred to their security walls or gates by an accident, the contractor will restore them promptly with the insurance coverage. The contractors' social and environmental safeguard office will be coordinated with the APs. However, allocation of the block amount is suitable under the entitlement matrix.

60. Table 2.1 presents details of the pipe alignments from Jubilee to Colambage Mawatha. Most of the roads selected for laying the transmission pipelines are located within residential areas occupied by households representing diverse socioeconomic backgrounds. The comparatively narrower residential roads are primarily situated in close proximity to the Jubilee Pump House, including Muttetuwe Road, Mahawatta Road, and Raja Mawatha. After crossing Kotte–Mirihana Road, the roads from Devala Road to Colambage Mawatha are comparatively wider, and public disturbance is expected to be minimal.

61. Nawala Road is the only section located within a commercial area. It is a four-lane road with wide shoulders and pedestrian pavements. Therefore, apart from temporary dust and noise during construction, no significant inconvenience is anticipated for shop owners, pedestrians, or the general public. Construction activities at any given location are expected to last only one to two days.

6. MITIGATION MEASURES AND SAFEGUARD PLANS

62. Almost all temporary inconveniences can be effectively resolved through appropriate engineering solutions and efficient construction management practices, provided that potential issues are addressed proactively before they escalate into public concern.

63. The establishment of a GRM and a dedicated call center, along with the wide public disclosure of these safeguard measures, will be a prerequisite for building confidence among residents regarding subcomponent implementation. This mechanism will ensure systematic recording of grievances, prompt response and resolution, and ongoing monitoring of the effectiveness and efficiency of the grievance-handling process.

64. A clearly defined turnaround time shall be established to address damage to utility services, which is common in construction activities involving road excavation, as uninterrupted utility services are essential for the smooth functioning of urban life.

65. Road excavation at critical locations shall be carried out exclusively during nighttime hours. These critical locations include:

- Road crossings such as Pagoda Road, Kotte Road, and Nawala Road; and
- Major junctions at both ends of Chandra Silva Mawatha where heavy traffic is present from 6 a.m. to 10 p.m.

66. It shall be mandatory to inform all households of the area about the commencement date of construction through construction notices at least seven days in advance, enabling residents to prepare for and adapt to any temporary inconveniences.

67. The contractor will be fully responsible for reinstatement of unfrozen damages such as cracks to houses / or auxiliary structures that occurred accidentally during construction. Adequate and relevant provisions will be incorporated into the bidding documents and contractual agreements. A provisional sum will be included in the contract package and may be utilized, subject to approval by the Project Director, based on justified cost estimates (Ref. Entitlement Matrix). In addition, the contractor's civil works insurance policy may be used to cover the cost of unforeseen property damage.

7. PUBLIC CONSULTATION AND INFORMATION DISCLOSURE

68. All documents related to the proposed subcomponent will be disclosed to the public through the ADB website and the NWSDB website. In addition, a descriptive leaflet about the proposed subcomponent prepared by the project prior to the project implementation and hard copies of the other social safeguard-related documents in local languages will be made available for public reference at the relevant GN offices, PIU, and the offices of the O&M Manager of the Jubilee system.

69. Improving the water supply in the subcomponent area has been a pressing need. According to the NWSDB, this has been discussed on numerous occasions at district coordinating committee (DCC) meetings, and all stakeholders are aware of the subcomponent for the last 10 years. Relevant stakeholders, including the CEA, have granted approval for the project, while the RDA and the relevant MCs generally allow water supply, wastewater, telecommunication, and electricity service to use the ROW of the existing roads.

70. Thirty-one (31) households along the transmission main alignment were interviewed to assess their perceptions of the pipelaying in their residential areas and the temporary inconveniences associated with excavation. During the household interviews, residents confirmed their willingness to bear temporary inconveniences associated with pipe-laying activities, recognizing the project's importance for the country's development. They noted that similar disruptions have occurred in the past due to other infrastructure works in the area, such as excavations for communication cables and maintenance of electricity lines. Residents indicated that they could use alternative routes to access their properties if usual routes are temporarily obstructed during construction. As most properties have access from both sides of the road, complete access restrictions are not anticipated, except for houses located directly within the daily excavation locations.

71. However, these households noted the following issues related to the laying of pipes, which would need a better solution/s compared to what has happened in the past.

- Potential damage to existing carpeted road surfaces and the time required to reinstate them to their original condition, including whether roads will be fully re-carpeted or only partially reinstated. Residents expressed concern that reinstated sections may deteriorate over time, particularly during heavy rainfall.
- Possible damage to utility services (water, electricity, and telephone lines) and the response time required for service restoration by the contractor. Residents requested that water supply interruptions be addressed within six hours and that arrangements be made with the Electricity Board to restore electricity within four hours.
- Arrangements for addressing health emergencies, particularly during nighttime, including contractor assistance in transporting patients to the nearest hospital if access is temporarily restricted due to construction activities.
- Some households (HHs) expressed concerns regarding potential worker indiscipline, such as urinating in road drains or against walls during nighttime work, improper disposal of leftover food, and inadequate site cleaning, which could disturb their peaceful living environment.
- The hooting of horns and noise from vehicles and machinery may also disturb residents' sleep. However, despite these concerns, community members expressed overall support for the proposed project.

72. In response, it was explained that these issues will be identified and addressed in advance by the project and that the contractor shall develop and implement an environmental and social management plan (ESMP). This ESMP will include associated cost estimates that will be incorporated into the contractor's agreement. It was further explained that GRM, including a call center, will be established to address residents' concerns and that all safeguard measures will be disclosed to affected parties prior to the commencement of construction.

8. ENTITLEMENT MATRIX

73. The proposed subcomponent will not trigger IR impacts such as acquisition of private land or evacuation of people from their residences or livelihood activities. There can be temporary disturbances to the residents living on transmission alignment and in the vicinity of the construction site at the Jubilee system improvement as described in the impact assessment section.

Table 8.1: Entitlement Matrix and Allocation for Reinstatement

Type of Loss	Definition of Entitled Person	Provision/entitlement	Compensation Policy	Amount LKR
Temporary loss of secure parking space	NWSDB officers park their vehicles in the proposed construction site.	Assistance to access secure parking facilities	NSWDB will provide alternative parking facilities for its staff.	-
Temporary disturbances in communities	Householders living in the immediate vicinity of the construction site at Jubilee Reservoir	Effective communication and interaction with householders likely to be disturbed.	The construction schedule of the subcomponent footprint will be communicated to the householders at least 30 days ahead of the commencement of subcomponent activities. continuous dialogue with the HHs in the construction site by PIU and contractor	-
	HHs living on roads where transmission lines are installed	Effective communication and interaction with householders likely to be disturbed. Comply with the construction procedures and norms.	Residents of the area are informed about the pipe-laying slot every morning by the constructor, and the residents are requested to use the alternative route to reach their houses (the residents on these roads have access to their houses from both ends of their roads). Road closed signs are to be placed in the right places to prevent other vehicles from entering other than the residents.	-
Unfrozen damages can occur due to accidents, cracks to houses/or auxiliary structures.	HHs living on comparatively narrow roads	Immediate reinstatements of damages	Insurance coverage for these unforeseen incidents is mandatory by the contractor.	40 million

9. IMPLEMENTATION ARRANGEMENTS AND CAPACITY BUILDING

A. Institutional Arrangements

74. **National Steering Committee (NSC).** At the central level, an NSC will be established at the Ministry of Housing, Construction, and Water Supply (MHCWS) with the secretary to the ministry chairing the proceedings. Other members of the PSC will include staff from the Ministry, the NWSDB, and the ADB. Other government institutes, such as the land ministry, the department of project management and monitoring, the department of national budget, the department of national planning, the department of external resources, the road development authority, and the central environmental authority, will also be members of the NSC. The NSC will be responsible for, (i) Monitor and reviewing project performance levels and discussing key policy-related issues; (ii) reviewing overall progress and discussing key issues to be addressed at the ministry level; (iii) ensuring collaboration among stakeholders; and (iv) monitoring implementation and reviewing technical assistance (TA) performance levels, providing guidance, and discussing key policy-related issues.

75. **Executing Agency (EA) and Implementing Agency (IA).** The Executing Agency (EA) is the Ministry of Housing, Construction, and Water Supply, and the Implementing Agency (IA) is the NWSDB. The project EA will have the following responsibilities: (i) provide policy directions to facilitate loan project and TA implementation; (ii) chair the National Steering Committee; (iii) review the project and TA performance regularly and resolve issues; (iv) ensure overall oversight of the loan project and TA; (v) approve annual programs and budget and facilitate (vi) coordination among the Ministry of Housing, Construction and Water Supply; the Ministry of Finance; and the ADB; (vii) provide guidance and policy-level support to the project and TA; and (viii) approve the constitution of various committees for evaluation of bids. The NWSDB as the project IA among implementation of project related activities will be responsible for, (i) establish and maintain PMU; (ii) Recommend key policy decisions for PMU for smooth project implementation; (iii) provides technical and institutional capacity building support; (iv) procurement oversight for contracts; (v) ensure timely decisions for efficient procurement and contract management; (vi) reports to ADB; (vii) ensure system for sustainable operation and maintenance project offices/facilities; (viii) ensures the gender equality and social inclusion is implemented and reported in its terms; (ix) delegates power to Project Director; (x) approves all key processes and procedures to be followed; (xi) monitors and reviews implementation of the Projects and takes appropriate decision to expedite; (xii) monitors implementation of loan covenant agreed with ADB and issue necessary direction jointly with the MHCWS; (xiii) issues necessary direction that the project is implemented within schedule; (xiv) approve contract awards, contract variations and contract time extensions; (xv) maintains project accounts and project financial records; (xvi) prepares budgeting and financial planning and management; (xvii) submits all audited project financial statements and financial statements pertaining to the project; (xviii) ensures auditing of loan proceeds and maintenance of all accounts; (xix) ensure timely internal auditing; and (xx) ensures the development and implementation of major outputs and capacity building activities as per attached technical assistance.

76. A Project Management Unit (PMU) and Project Implementation Units (PIUs) will be established within the Implementing Agency, with responsibilities as follows:

77. **Project Management Unit (PMU).** The PMU will be established and headed by a full-time project director and assisted by deputy project directors for the three PIUs set up for interventions in the western province (PIU1), southern province (PIU2), and northern province (PIU3). The PMU and PIUs will be responsible for (i) contract management and administration, (ii) construction supervision, and (iii) reporting/meetings.

78. The PMU will also be responsible for monitoring safeguards compliance, public relations activities, gender mainstreaming activities, and community participation activities. The PMU will have a social-gender officer and an environment officer who will be responsible for: (i) ensuring that the contents of the social and environmental assessments are in compliance with the provisions and requirements of the ADB SPS 2009, such as ensuring that works are selected according to the environmental and social safeguards criteria for project selection; (ii) reviewing and approving project environmental assessments and Environmental Management Plans (EMPs); (iii) ensuring timely disclosure of final environmental assessments/EMPs in locations and forms accessible to the public and stakeholders; (iv) proper implementation and monitoring of social and environmental safeguard compliance; (v) consolidation of monthly/quarterly social and environmental monitoring reports from PIUs (Ref. Appendix 5) and submission of semi-annual monitoring reports to the ADB; and (vi) addressing any grievances brought about through the GRM in a timely manner, (vii) ensuring timely response to unforeseen damages to residential structures during construction, in coordination with contractors, (viii), establishing the grievance redress mechanism (GRM) at least two months prior to commencement of construction and disseminating information on grievance submission procedures to households within construction area and maintaining grievance records, (ix) monitoring safeguard compliance during construction, particularly where works are conducted at night due to narrow roads, with attention to worker discipline and community concerns, (x) ensuring prohibition of child labor, as defined in national legislation, in construction and maintenance activities, (xi) ensuring equal pay for work of equal value regardless of gender, ethnicity, or caste, (xii) eliminating forced labor and (xiv) disseminating information on sexually transmitted diseases, including HIV/AIDS, to project workers and surrounding communities. The semi-annual monitoring report submitted by PMU to ADB will focus on the progress of implementation of the EMP and compliance of social safeguards during, issues encountered, measures adopted, and follow-up actions required, if any, as well as the status of compliance with relevant loan covenants.

79. **The Regional Support Centers (RSCs)** of NWSDB will also assist the PMU and PIUs in implementing the project along with other stakeholders such as the local authorities, community-based organizations (CBOs), RDA, PRDA, the Department of Irrigation, and the successor companies of Ceylon Electricity Board (CEB).

80. **Project management and supervision consultant (PMSC).** The PMSC will be engaged to work closely with and advise the PMU and PIUs in implementing the project. The PMSC will include a full-time environmental and social specialist.

81. **Contractor.** The contractor will be responsible for the construction and commissioning works of the construction of a new sump and pipelaying. The contractor will also appoint a Social & Environment Officer to (i) mitigate any social issues that arise during construction, (ii) coordinate with PIU on updating the safeguard documents and environmental assessments/EMP based on detailed designs, and (iii) ensure implementation of the EMP during civil works.

82. **Environmental and Social Division (ESD) of NWSDB.** The Environmental and Social Division (ESD) of NWSDB is headed by the Deputy General Manager (Environmental & Social) and supported by two Assistant General Managers [Sociology & water, sanitation, and hygiene (WASH)] and [Environmental and Water Resources], along with sociologists and other supporting staff.

83. The ESD promotes environmental sustainability and social responsibility in NWSDB's planning, design, construction, and operational activities. Its focus areas

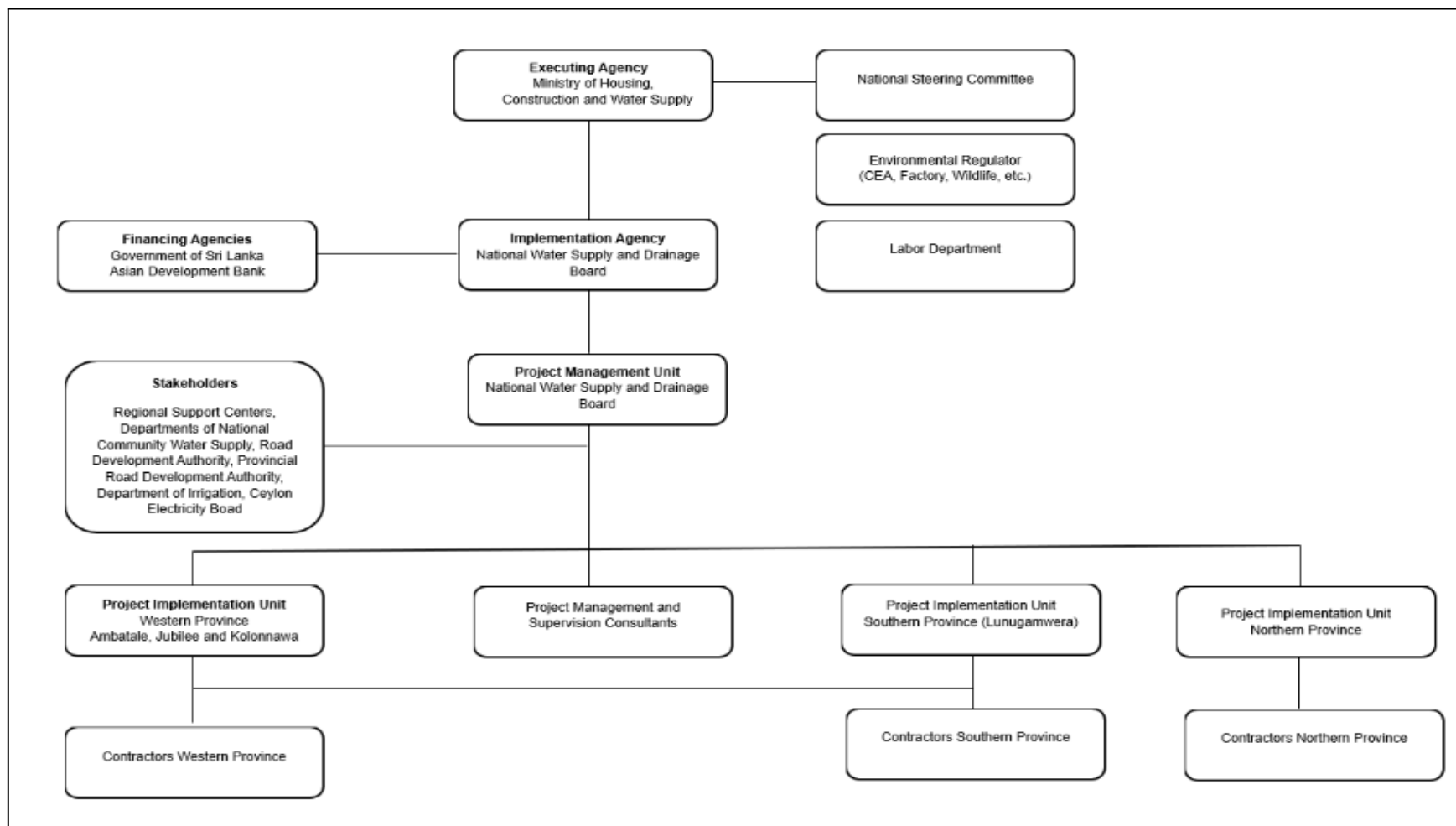
include safeguarding water quality, ensuring water quantity, integrating disaster and climate resilience, strengthening environmental and social safeguards, and promoting gender inclusiveness. At present, the role of the ESD in project-level safeguard implementation requires a clearer definition, as projects appear to be implementing social and environmental policies independently through dedicated staff. This institutional gap will be addressed once the division is fully operational and formally integrated into monitoring social and environmental safeguard compliance in subcomponents. The CRSWSSP will support NWSDB to further strengthen the ESD.

84. **Logistical Support and Contractor Compliance.** The EA and IA will provide all necessary logistical support to the PMU, including vehicles, office equipment, and support staff, to ensure effective project implementation, including site-level supervision, quality control, and contract administration. Day-to-day monitoring of social and environmental safeguard requirements, in accordance with the Environmental Management Plan (EMP), will be undertaken by project staff.

Table 9.1: Institutional Roles and Responsibilities for Safeguards Implementation

Activities	Institution Responsible
Disclosure of proposed project and anticipated social and environmental impacts on ADB website	ADB NWSDB
Disclosure of proposed project, social/environmental impacts, proposed mitigation measures in local languages	NWSDB
Disclosure of grievance redress mechanism/process	NWSDB, PMU, PIU
Finalization of designs for the Jubilee system and pipeline to Colombage Mawatha	NWSDB
Finalization of pipeline alignments	NWSDB RSC, PIU & PMU
Identification of roads for closure, existing utilities, road conditions	NWSDB RSC - O&M, PMU, PIU
Updating of safeguard documents based on detailed design	PIU & PMU
Review of updated EA and send to ADB for approval before contract award	NWSDB PMU
Clearance and disclosure of updated safeguard documents	ADB; NWSDB
Conducting transect walks through road stretches to identify the extent of impacts	PIU & PMU, Contractor
Conducting meetings at the community/household level with affected persons (APs)	PIU & PMU, Contractor
Design/implementation of detailed measurement survey (DMS) on roads identified for full/partial closure, identification of poor and vulnerable APs	PIU & PMU, RSC - O&M
Categorization of APs for finalizing entitlements, if any	PIU
Conducting consultations/ focus group discussions/ meetings/ workshops during DMS survey and updating safeguards documents	PIU & PMU DS and GN (if needed)
Implementation of mitigation and rehabilitation measures	NWSDB RSC, PMU PIU, Contractor
Consultations with APs during rehabilitation activities	PIU & PMSC, Contractor
Grievance redressal	GRC & NWSDB PMU PIU & PMSC, Contractor
Internal monitoring	NWSDB, RSC, PMU, PIU & PMSC

85. The proposed project organizational structure is presented in Figure 9.1 below.



Figure

9.1: Proposed Organizational Structure
Source: Asian Development Bank

B. Capacity Building

86. Staff of the NWSDB and contractors engaged in project implementation will be required to be fully conversant with ADB Social Safeguard Policy requirements, including the avoidance and mitigation of temporary impacts. As illustrated in Figure 10, the PMU structure includes a senior sociologist, an environmental officer, and a safety officer, who will be responsible for ensuring compliance with social and environmental safeguard requirements throughout project implementation.

87. The social safeguard planning and implementation capacity of the NWSDB has been strengthened through the provision of technical expertise, targeted training, and continued institutional support, particularly by establishing the environmental and social division. The capacity-building measures will continue throughout the project implementation period. Prior to commencement of works, and as required during implementation, relevant technical and safeguard staff, including contractor personnel, will receive both general and task-specific training on social and environmental safeguards, pipe-laying activities, construction quality assurance, occupational health and safety, and the identification, monitoring, and mitigation of environmental and social impacts.

88. To further strengthen the capacity of the PMU and contractors, orientation and training on resettlement management will be conducted at the outset of the project. The capacity-building program will cover the following:

- Meaningful consultation, participation, and information disclosure;
- Entitlements and compensation disbursement mechanisms;
- Grievance redress mechanisms; and
- Monitoring and reporting

10. GRIEVANCE REDRESS MECHANISM

89. A project Grievance Redressal Mechanism (GRM) will be established at three levels and will cover both environment and social issues. The GRM will be established to evaluate and facilitate the resolution of affected persons' concerns, complaints, and grievances related to social and environmental issues arising from subcomponent-related activities in a time-bound manner. GRM will be accessible, inclusive, gender-sensitive, and culturally appropriate for receiving and facilitating the resolution of affected persons' grievances related to the project.

90. The GRM will be disclosed to the communities within the subcomponent footprint prior to the mobilization of contractors for the project. Contact details and the process of grievance redressal will be disclosed to the communities through notices displayed within the relevant Grama Niladhari, divisional secretary, and NWSDB offices (including the PIU). Notices will also be displayed at locations with frequent/common community gatherings, such as temples and other religious buildings. The PIU safeguard officers will be responsible for registration of grievances, disclosure and communication, and timely resolution of grievances. A complaint register will be maintained at the site office and PIU level with details of the complaint lodged, date of personal hearing, action taken, and date of communication sent to the complainant.

91. Affected persons will have the flexibility of conveying grievances/suggestions by submitting the grievance/suggestion through the already established customer care smart zone or through the 24-hour call center. A grievance/suggestion can also be conveyed in writing, through email or telephone call to the site engineer, PIU project manager, or PIU safeguards officer(s), or by writing in the complaint's logbook at the site office. A sample grievance redressal registration form is given in Appendix 4. The grievances could also be directed to the environmental and social division of the NWSDB.

A. Grievance Redressal Process

92. In case of grievances that are immediate and urgent in the perception of the complainant, the project manager, with the support of the site engineer on-site, will provide the most easily accessible or first level of contact for quick resolution of grievances. Contact phone numbers and names of the concerned project manager, PIU safeguards officers, and contractors will be displayed at all construction sites at visible locations. The second level will be at the PMU level, with grievances taken up for resolution by the Deputy Project Director, supported by the Sociologist/Social and Gender Officer, PMU, and the Environmental Officer, PMU. The third level will be a three-member committee with the project director and PMU acting as its convenor.

- i. **1st Level Grievance.** The phone numbers of the respective deputy project director, site engineer, PIU-level safeguard officers, PMSC safeguards specialists, and contractors' environmental/social and safety officers shall be made available at the construction site signboards. The contractors and site unit staff can immediately resolve grievances onsite and seek the advice of the deputy project director as required and resolve grievances within seven days of receipt of a complaint/grievance. The Grama Niladhari of the respective village will also be a member of this 1st-level grievance committee.
- ii. **2nd Level Grievance.** All grievances that cannot be redressed within seven days at the first (site) level will be reviewed by the Deputy Project Director at PIU with the support of the divisional secretary. The PIU level safeguards officers, PMSC safeguards specialists, and a senior-level staff or representative of the contractor will

assist the DPD. This committee at the PMU level (2nd level) shall resolve grievances within fourteen days of receipt / reference of a complaint/grievance.

- iii. **3rd Level Grievance.** All grievances that cannot be redressed within 14 days at level 2 (PIU) will be placed before the level 3 grievance redressal committee (GRC). This level three committee will attend to such grievances within 30 days, as only critical issues such as land-related matters shall be elevated to this level. This GRC committee will comprise a minimum of five members, with preferably one member being a woman. The secretary to the ministry, project director, and senior officers of any relevant line agency will form the other members of this GRC.

93. **Court of Law: Despite the project GRM**, an aggrieved person shall have access to the country's legal system at any stage, and accessing the country's legal system can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM.

94. **ADB Accountability Mechanism.** Any project-affected person can use the ADB Accountability Mechanism through directly contacting (in writing) the Complaint Receiving Officer (CRO) at ADB headquarters or the ADB Sri Lanka Resident Mission (SLRM). The complaint can be submitted in any of the official languages of ADB's developing member countries.

11. FINDINGS AND RECOMMENDATIONS

95. The proposed improvements to the Jubilee System are expected to generate substantial benefits for both existing consumers and prospective applicants for water supply services within the administrative areas of Kotte, Maharagama, and Thimbirigasyaya. The projected water demand in these service areas by 2030 is estimated at 50,871 m³/day, highlighting the urgency of upgrading the system to ensure a continuous, adequate, and high-quality water supply. The proposed interventions will enhance system capacity, operational reliability, and service coverage, thereby support urban growth and improve public health and living standards.

96. The land required for the construction of facilities associated with the Jubilee System improvements is owned by the National Water Supply and Drainage Board (NWSDB). The transmission and feeder mains extending from Ambatale to Jubilee and from Jubilee to the Colombo Municipal Council boundary at Colabage Mawatha are to be installed along public road corridors under the jurisdiction of the RDA, the PRDA, and the Municipal Councils of Colombo and Kotte. As all works will be carried out within existing public road rights-of-way and NWSDB-owned premises, no land acquisition is required. Furthermore, the lands available at Jubilee are free from encroachments and informal settlements, eliminating the need for resettlement or livelihood restoration measures.

97. The area surrounding the Jubilee facility is densely populated and characterized by mixed residential and commercial land use. Accordingly, comprehensive mitigation measures shall be implemented to minimize potential disturbances, such as noise, vibration, dust, traffic congestion, and restricted access, during construction. In the event that piling or vibration-intensive works are required, a pre-construction structural condition survey (crack survey) shall be conducted for adjacent properties. This will document baseline conditions, provide a reference for assessing potential impacts, and reduce the likelihood of disputes or compensation claims.

98. As construction activities will be undertaken within vacant areas located inside operational NWSDB premises, there is a potential occupational health and safety risk to existing staff and visitors. Therefore, all construction zones shall be clearly delineated and physically segregated from operational areas. Appropriate safety measures, including secure fencing, durable hoardings, warning signage, controlled access points, and covered walkways where necessary, shall be installed and maintained throughout the construction period to prevent unauthorized entry and accidental injuries.

99. A Project-specific Grievance Redress Mechanism (GRM), as described in this document, shall be established no later than two months prior to the commencement of construction activities. The GRM shall provide accessible, transparent, and time-bound procedures for receiving, recording, and resolving complaints from affected communities and stakeholders. Information regarding the GRM, such as contact details, submission channels, and resolution procedures, shall be widely disseminated to residents, businesses, and institutions along the pipeline alignment through public notices, community meetings, and other appropriate communication platforms.

100. The Environmental and Social Division of the NWSDB will support the PMU and PIU for overseeing and monitoring contractors' compliance with all applicable environmental and social safeguard requirements during the construction phase. This shall include regular site inspections, review of contractors' method statements and management plans, monitoring of occupational health and safety practices, and verification of compliance with environmental mitigation measures. Corrective actions shall be promptly implemented in the event of non-compliance.

101. Local political representatives and relevant administrative authorities shall be formally notified in advance of the proposed construction schedule, anticipated disruptions, and expected completion timelines. Their cooperation and support shall be sought to facilitate smooth project implementation, enhance coordination with local communities, and address unforeseen issues through established institutional and social channels.

102. Construction activities along major roadways and at key road crossings, such as Nawala Road, Pagoda Road (for pipe laying), the crossing at Kotte-Mirihana Road, and Nugegoda-Nawala Road, shall be scheduled exclusively during nighttime hours, subject to approval from the relevant road authorities and local councils. This approach is intended to minimize temporary inconvenience to commercial establishments, employees, customers, pedestrians, and both public and private vehicular traffic. Adequate traffic management plans, signage, lighting, and safety personnel shall be deployed to ensure public safety during such operations.

103. Overall, the anticipated temporary inconveniences associated with the project, such as traffic diversions, access restrictions, noise, and dust, which occur during the civil works period (temporary), can be effectively mitigated through appropriate engineering design, advance planning, and sound construction management practices. Proactive identification of potential risks, coupled with timely stakeholder engagement and responsive grievance management, will be essential to preventing minor disruptions from escalating into significant public concerns and to ensuring the successful and socially responsible implementation of the Jubilee System improvements.

APPENDIX 1

Involuntary Resettlement Impact Categorization Checklist

Activity Name: Jubilee System Improvement

Province/ District: Western Province/Colombo

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
1. Will there be land acquisition?		√		Land is the property of the NWSDB. Transmission pipe laying will be done along the ROW of existing roads.
2. Is the site for land acquisition known?		√		N/A
3. Are the ownership status and current usage of land to be acquired known?		√		Land is the property of the NWSDB
4. Will easement be utilized within an existing Right of Way (ROW)?		√		ROW through public road
5. Will there be loss of shelter and residential land due to land acquisition?		√		Jubilee O&M office be moved within the land for better use of the space
6. Will there be loss of agricultural and other productive assets due to land acquisition?		√		
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?		√		
8. Will there be loss of businesses or enterprises due to land acquisition?		√		
9. Will there be loss of income sources and means of livelihood due to land acquisition?		√		
Involuntary restrictions on land use or on access to legally designated parks and protected areas				
10. Will people lose access to natural resources, communal facilities and services?		√		
11. If land use is changed, will it have an adverse impact on social and economic activities?		√		
12. Will access to land and resources owned communally or by the state be restricted?		√		
Information on Displaced Persons:				
Any estimate of the likely number of persons that will be displaced by the Project? [√] No [] Yes				
If yes, approximately how many?				
Are any of them poor, female-heads of households, or vulnerable to poverty risks? [√] No [] Yes				
Are any displaced persons from indigenous or ethnic minority groups? [√] No [] Yes				
IR categorization of activity	Cat. A	Cat. B	Cat. C	Category C
Remarks/ recommendations:	No private lands are used for the project implementation. Hence no IR principles triggered			
Prepared/ endorsed by (date):	Ananda Dissanayake (30 March 2026)			

APPENDIX 2

Indigenous Peoples Impact Screening Checklist

Activity Name: Jubilee System Improvement

Province/ District: Western Province/Colombo

KEY CONCERNS	YES	NO	NOT KNOWN	Remarks
A. Indigenous Peoples Identification				
1. Are there socio-cultural groups present in or use the project area who may be considered as "tribes" (hill tribes, schedules tribes, tribal peoples), "minorities" (ethnic or national minorities), or "indigenous communities" in the project area?		√		No IPs or their activities are present within the project footprint.
2. Are there national or local laws or policies as well as anthropological researches/studies that consider these groups present in or using the project area as belonging to "ethnic minorities", scheduled tribes, tribal peoples		√		No IPs or their activities are present within the project footprint.
3. Do such groups self-identify as being part of a distinct social and cultural group?		√		No IPs or their activities are present within the project footprint.
4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?		√		No IPs or their activities are present within the project footprint.
5. Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?		√		No IPs or their activities are present within the project footprint.
6. Do such groups speak a distinct language or dialect?		√		No IPs or their activities are present within the project footprint.
7. Has such groups been historically, socially and economically marginalized, disempowered, excluded, and/or discriminated against?		√		No IPs or their activities are present within the project footprint.
8. Are such groups represented as "Indigenous Peoples" or as "ethnic minorities" or "scheduled tribes" or "tribal populations" in any formal decision-making bodies at the national or local levels?		√		No IPs or their activities are present within the project footprint.
B. Identification of Potential Impacts				
9. Will the project directly or indirectly benefit or target Indigenous Peoples?		√		No IPs or their activities are present within the project footprint.
10. Will the project directly or indirectly affect Indigenous Peoples' traditional socio-cultural and belief practices? (e.g. child-rearing, health, education, arts, and governance)		√		No IPs or their activities are present within the project footprint.
11. Will the project affect the livelihood systems of Indigenous Peoples? (e.g., food production system, natural resource management, crafts and trade, employment status)		√		No IPs or their activities are present within the project footprint.

12. Will the project be in an area (land or territory) occupied, owned, or used by Indigenous Peoples, and/or claimed as ancestral domain?		√		No IPs or their activities are present within the project footprint.
C. Identification of Special Requirements <i>Will the project activities include:</i>				No IPs or their activities are present within the project footprint.
13. Commercial development of the cultural resources and knowledge of Indigenous Peoples?		√		No IPs or their activities are present within the project footprint.
14. Physical displacement from traditional or customary lands?		√		No IPs or their activities are present within the project footprint.
15. Commercial development of natural resources (such as minerals, hydrocarbons, forests, water, hunting or fishing grounds) within customary lands under use that would impact the livelihoods or the cultural, ceremonial, spiritual uses that define the identity and community of Indigenous Peoples?		√		No IPs or their activities are present within the project footprint.
16. Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied or claimed by indigenous peoples?		√		No IPs or their activities are present within the project footprint.
17. Acquisition of lands that are traditionally owned or customarily used, occupied or claimed by indigenous peoples?		√		No IPs or their activities are present within the project footprint.

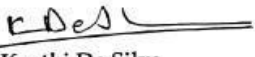
D. Anticipated Project Impacts on Indigenous Peoples

Project component/ activity/ output	Anticipated positive effect			Anticipated negative effect
LIST ALL PROJECT COMPONENT / ACTIVITY / OUTPUTS HERE	INDICATE EFFECTS TO IPS OR PUT N/A AS NECESSARY			
1.Pipe laying	N/A			N/A
2.WTP constructions	N/A			N/A
3.Elivated tanks and group sump constructions	N/A			N/A
IR categorization of activity	Cat. A	Cat. B	Cat. C	Category C
Remarks/ recommendations:	Indigenous Peoples (IP) in Sri Lanka are limited to a few locations in the Uva and Eastern Provinces, and they are now largely integrated with the majority ethnic groups—Sinhalese and Tamils.			
Prepared/ endorsed by (date):	Ananda Dissanayake (30th March 2026)			

Note: The project team may attach additional information on the project, as necessary.

APPENDIX 3

Environmental Clearance letter, 22 January 2019

මධ්‍යම පරිසර අධිකාරිය மத்திய சுற்றாடல் அதிகாரசபை Central Environmental Authority					
පරිසර පියස, 104, ඩෙන්සිල් කොබ්බෑකඩුව මාවත, බත්තරමුල්ල, ශ්‍රී ලංකාව. "பரிசர பியச", 104, டென்சில் கொப்பேகடுவ மாவத்தை, பத்தரமுல்லை, இலங்கை. "Parisara Piyasa", 104, Denzil Kobbekaduwa Mawatha, Battaramulla, Sri Lanka. Web: www.cea.lk					
අපේ යොමුව எமது தொடர்பு Our Ref.	08/EIA/water /01/2015	உமது தொடர்பு Your Ref.			
		දිනය 22 January 2019 திகதி Date			
Eng. S A Rasheed Project Director(GCWWMIP) National Water Supply & Drainage Board SRI: Integrated Water Supply Investment Project Obtaining Environmental Clearance for implementation of Water Supply Projects This has reference to your letter dated 21/12/2018 requesting environmental clearance for the projects listed below. 1. Jubilee Water Supply System Improvement 2. Chilaw Water Supply Scheme phase 11 3. Hambegamuwa Water Supply Scheme 4. Kelaniya Distribution System Improvements 5. Kolonnawa Distribution System Improvements 6. Kotte Distribution System Improvements 7. Augmentation of Eheliyagoda Water Supply Scheme 8. Improvements to Lunugamwehera, Tissa, Kirinda, Badulla and Thanamalwila Integrated Water Supply Scheme As per the project details submitted by you, none of the above listed projects require to undergo Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA) procedure in terms of the National Environmental Act. However please note that as per the Gazette No 1533/16 dated 2008.01.25, construction of water treatment plants exceeding 10,000 m³ are required to obtain an Environmental Protection License(EPL) from the CEA prior to commencing of the operational activities of the treatment plant. Accordingly an EPL will be required for treatment plants of No: 6 & No: 8 of the above list.  Kanthi De Silva Deputy Director General (EM&A) Central Environmental Authority					
Chairman Tel : 2872361, 2872348 Fax : 2872347	Director General Tel : 2872359 Fax : 2872608	General Office Tel : 2872278, 2873447, 2873448 787277-280	Complaint: 2888999 Compliance Monitoring: 2076152		
Deputy Director Generals Tel : 2865296 Fax : 2877515	HRD, Admin. & Finance Tel : 2865296 Fax : 2877515	Envl. Pollution Control Tel : 2873453 Fax : 2872605	Envl. Mgt. & Assess. Tel : 2872388 Fax : 2872296	Envl. Edu. & Awareness Tel : 2872297 Fax : 2872600	Waste Mgt. Te: 287249 Fax: 2882152
මහවැලි සංවර්ධන හා පරිසර අමාත්‍යාංශය மகாவலி அபிவிருத்தி மற்றும் சுற்றாடல் அமைச்சு Ministry of Mahaweli Development & Environment					

APPENDIX 4

Sample Grievance Registration Format

The _____ Project welcomes complaints, suggestions, queries and comments regarding project implementation. We encourage persons with grievance to provide their name and contact information to enable us to get in touch with you for clarification and feedback. Should you choose to include your personal details but want that information to remain confidential, please inform us by writing/typing *(CONFIDENTIAL)* above your name. Thank you.

Date		Place of registration			
Contact Information/Personal Details					
Name		Gender	* e * male	Mal Fe	Age
Home Address					
Place					
Phone no.					
E-mail					
Complaint/Suggestion/Comment/Question Please provide the details (who, what, where and how) of your grievance below:					
If included as attachment/note/letter, please tick here:					
How do you want us to reach you for feedback or update on your comment/grievance?					
FOR OFFICIAL USE ONLY					
Registered by: (Name of Official registering grievance)					
Mode of communication: Note/Letter E-mail Verbal/Telephonic					
Reviewed by: (Names/Positions of Official(s) reviewing grievance)					
Action Taken:					
Whether Action Taken Disclosed:			Yes /No		
Means of Disclosure:					

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APPENDIX 5

OUTLINE OF SOCIAL SAFEGUARDS MONITORING REPORT DURING PROJECT IMPLEMENTATION

Following requirements of the ADB Safeguard Policy Statement (2009) and the *Operations Manual* section on safeguard policy (OM F1), borrowers/clients are required to establish and maintain procedures to monitor the status of implementation of safeguard plans and ensure progress is made toward the desired outcomes. For projects categorized as A or B in Involuntary Resettlement and/or Indigenous People, the Borrowers/clients are required to submit semi-annual monitoring reports for ADB review. The level of detail and comprehensiveness of a monitoring report is commensurate with the complexity and significance of social safeguards impacts (IR) and with the current status of the project implementation phase.

This outline can be used for a periodic monitoring report (semiannual) and RP completion report to start the civil works in the impacted areas. A safeguard monitoring report may include the following elements:

A. Executive Summary

This section provides a concise statement of project scope and impacts, key findings and recommended actions.

B. Background of the Report and Project Description

This section provides a general description of the project, including:

- Background/context of the monitoring report, which includes the information on the project, project components, safeguards categorizations, and general scope of the social safeguards impacts.
- Information on the implementation progress of the project activities, scope of monitoring report and requirements, reporting period, including frequency of submission and changes in project scope and adjusted safeguard measures, if applicable
- Summary table of identified impacts and the mitigation actions.

C. Scope of Impacts

This section outlines the detail of

- Scale and scopes of the project's safeguards impacts,
- Vulnerability status of the affected people/communities,
- Entitlement's matrix and other rehabilitation measures, as applicable, as described in the approved final RP(s).

D. Compensation and Rehabilitation³

This section describes the process and progress of the implementation of the safeguards plan and other required activities as determined in the plan. This includes:

- Payment of the affected assets compensation, allowances, loss of incomes, etc. to the entitled persons;
- Provisions of other types of entitlement as described in the matrix and implementation of livelihood rehabilitation activities as determined in the plan.

³ Depending on the status of the final detail design during the submission of the report, this activity might not yet have started. Provide the information on the expected date of the activity to be conducted instead.

Quantitative as well as qualitative results of the monitoring parameters, as agreed in the plan, should be provided.

E. Public participation and consultation

This section describes public participation and consultation activities during the project implementation as agreed in the plan. This includes final consultations with APs during RP finalization after the completion of detail design; the number of activities conducted; issues raised during consultations and responses provided by the project team, implementing NGOs, project support consultants, contractors, etc.

F. Grievance Redress Mechanism (GRM)

This section describes the implementation of project GRM as designed in the approved RP. This includes evaluations of its effectiveness, procedures, complaints received, timeliness to resolve issues/ complaints and resources provided to solve the complaints. Special attentions should be given if there are complaints received from the affected people or communities.

G. Institutional Arrangement

This section describes the actual implementation or any adjustment made to the institutional arrangement for managing the social safeguards issues in the projects. This includes the establishment of safeguards unit/ team and appointment of staff in the EA/IA; implementation of the GRM and its committee; supervision and coordination between institutions involved in the management and monitoring of safeguards issues, the roles of NGO and women's groups in the monitoring and implementation of the plan, if any.

H. Monitoring Results - Findings

This section describes the summary and key findings of the monitoring activities. The results are compared against previously established benchmarks and compliance status (e.g., adequacy of IR compensation rates and timeliness of payments, adequacy and timeliness of IR rehabilitation measures including serviced housing sites, house reconstruction, livelihood support measures, and training; budget for implementing EMP, RP, timeliness and adequacy of capacity building, etc.). It also compared against the objectives of safeguards or desired outcomes documented (e.g., IR impacts avoided or minimized; livelihood restored or enhanced; If noncompliance or any major gaps identified, include the recommendation of corrective action plan.

I. Compliance Status

This section will summarize the compliance status of the project activities with the loan covenants, ADB SPS (2009) on SR 2, and the approved final RP(s).

J. Follow-up Actions, Recommendation, and Disclosure

This section describes recommendations and further actions or items to focus on for the remaining monitoring period. It also includes lessons learned for improvement for future safeguards monitoring activities. Disclosure dates of the monitoring report to the affected communities should also be included. A time-bound summary table for required actions should be included.

Appendices

- (i) List of Affected Persons and Entitlements and
- (ii) Summary of RP with entitlement matrix
- (iii) Copies of AP's certification of payment (signed by the APs) and
- (iv) Summary of minutes of meetings during public consultations

(v) (Summary of complaints received and solution status.