International ESIA for an Integrated Renewable Energy Project

180MW Wind Power and Battery Energy Storage System, Tsogttsetsii soum, Mongolia

Chapter 11 Environmental & Social Management and Monitoring Plan

PREPARED FOR

Net Zero Energy LLC
[redacted] and URECA

DATE
2 November 2026

REFERENCE
0747189



DOCUMENT DETAILS

The details entered below are automatically shown on the cover and the main page footer. PLEASE NOTE: This table must NOT be removed from this document.	
DOCUMENT TITLE	International ESIA for an Integrated Renewable Energy Project
DOCUMENT SUBTITLE	180MW Wind Power and Battery Energy Storage System, Tsogttsetsii soum, Mongolia
PROJECT NUMBER	0747189
DATE	2 November 2026
VERSION	05
AUTHOR	ERM-Hong Kong, Limited
CLIENT NAME	Net Zero Energy LLC (MCS and URECA)

DOCUMENT HISTORY

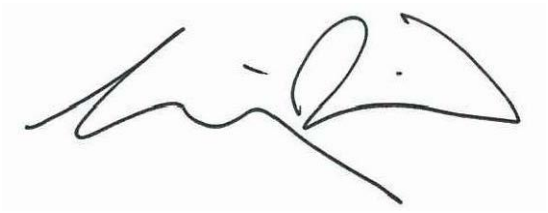
				ERM APPROVAL TO ISSUE		
VERSION	REVISION	AUTHOR	REVIEWED BY	NAME	DATE	COMMENTS
Version	00	Var.	Tom Glenwright	Craig Reid	28 November 2025	Draft
Version	01	Var.	Tom Glenwright	Craig Reid	19 December 2025	Addressed NZE comments
Version	02	Var.	Tom Glenwright	Craig Reid	08 May 2026	Addressed IFC comments
Version	03	Var.	Tom Glenwright	Craig Reid	15 May 2026	Final. Addressed NZE comments
Version	04	Var.	Tom Glenwright	Craig Reid	16 October 2026	Final. Addressed IFIs' comments
Version	05	Var.	Tom Glenwright	Craig Reid	2 November 2026	Final. Addressed IFIs' comments

SIGNATURE PAGE

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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AADT	Annual Average Daily Traffic
[redacted]	[redacted]
AIS	Air Insulated Switchgear
ALARP	As Low As Reasonably Practicable
AoI	Area of Influence
APLIC	Avian Powerline Interaction Committee
BESS	Battery Energy Storage System
BMP	Biodiversity Management Plan
BOD	biochemical oxygen demand
CAF	Central Asian Flyway
CAQMP	Construction Air Quality Management Plan
CCRA	Climate Change Risk Assessment
CD	Community Development
CH	Critical Habitat
CHA	Critical Habitat Assessment
CIA	Cumulative Impact Assessment
CIP	Climate Impact Platform
CITES	Convention on International Trade in Endangered Species
CLO	Community Liaison Officer
CMIP6	Coupled Model Intercomparison Project Phase 6
CMS	Conservation of Migratory Species of Wild Animals
CO	Carbon monoxide
COD	chemical oxygen demand
CR	critically endangered
CRM	Citizen's Representative Meeting
CRM	Collision Risk Model
CSMP	Cold Stress Management Plan
DEIA	Detailed Environmental Impact Assessment
DFID	International Development
DSF	Development Support Fund
E&S	Environmental and Social
EAAA	Ecologically Appropriate Area of Analysis

Acronyms	Description
EAAF	East Asian-Australasian Flyway
EBRD	European Bank for Reconstruction and Development
EC	Electrical Conductivity
EEO	Extent of Occurrence
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EN	Endangered
EPC	Engineering Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ERM	ERM-Hong Kong, Limited
ESA	European Space Agency
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environment and Social Management System
ETI	Ethical Trading Initiative
FERP	Flood Emergency Response Plan
FFDI	Arthur Forest Fire Danger Index
FGD	focus group discussion
FPIC	Free, Prior and Informed Consent
GBV	Gender-based violence
GCD	Global Climate Database
GHG	Green House Gas
GIIP	good international industry practice
GIS	Geographic Information System
GM	grievance mechanism
GPN	This Good Practice Note
GRM	Grievance Redress Mechanism
HCO	Bicarbonate
HSEQ	Health, Safety, Environment, and Quality
HSMP	Heat Stress Management Plan
HSS	Health, Safety and Security
HSSE	Health, Safety, Security and Environment
HVAC	Heating, Ventilation, and Air Conditioning

Acronyms	Description
IA	Impact Assessment
IAQM	Institute of Air Quality Management
IBA	Important Bird and Biodiversity Areas
IBAT	Integrated Biodiversity Assessment Tool
IFC	International Finance Corporation
ILO	International Labour Organisation
IMAR	Inner Mongolia Autonomous Region
IPA	Important Plant Areas
ISMP	Invasive Species Management Plan
IUCN	International Union for Conservation of Nature
KBA	Key Biodiversity Areas
KII	Key Informant Interview
LC	Least Concern
LiDAR	Light Detection and Ranging
LLC	Limited Liability Company
LO	Land Officer
LRP	Livelihood Restoration Plan
LRP	Livelihood Restoration Plan
LVIA	Landscape & Visual Impact Assessment
MCS	Mongolian Consulting Service
MECC	Ministry of Environment and Climate Change
MNS	Mongolian National Standard
MRIA	Mongolian Renewables Industries Association
MRL	Mongolian Red List
MSDS	Material Safety Data Sheet
MW	Mega Watt
MWEA	Mongolian Wind Energy Association
NASA	National Aeronautic Space Administration
NDC	Nationally Determined Contributions
NDC	National Dispatching Centre
NE	not evaluated
NGO	Non-governmental Organization
NH4+	Ammonium

Acronyms	Description
NO2	Nitrogen dioxide
NO2-	Nitrite
NO3-	Nitrate
NOAA	Atmospheric Association
NPTG	National Power Transmission Grid Company
NPTG	National Power Transmission Grid Company
NREC	The National Renewable Energy Centre
NSR	Noise sensitive receiver
NT	Near threatened
NZE	Net Zero Energy LLC
O&M	Operation and Maintenance
OHL	Overhead Transmission Line
OHS	Occupational Health and Safety
OT	Oyu Tolgoi
PA	protected area
PAD	project affected districts
PAPs	Project Affected Persons
PI, mg/L	Phosphate
PM	Particulate matter
POP	persistent organic pollutants
PPA	Power Purchase Agreement
PPE	Personal protective equipment
PS	Performance Standards
RAP	Resettlement Action Plan
RCIA	Rapid Cumulative Impact Assessment
RCS	Real Case Scenario
RILI	rainfall-induced landslide index
RoW	Right of Way
SCADA	Supervisory Control and Data Acquisition
SNH	Scottish Natural Heritage
SO	Social Officer
SO2	Sulphur dioxide
SO4	Sulphate

Acronyms	Description
SPA	Strictly Protected Area
SRTM	Shuttle Radar Topography Mission
STE	Serrated Trailed Edge
TDS	Total Dissolved Solids
TIP	Trafficking in Persons
TL	Transmission Line
TNC	The Nature Conservancy
TOR	Terms of Reference
UNEP	United Nations Environmental Programme
UNFCCC	United Nations Framework Convention on Climate Change
USD	United States dollars
UV	Ultra-violet
VEC	Valued Environmental and Social Components
VP	Vantage Point
VU	Vulnerable
WBG	World Bank Group
WBGT	Wet Bulb Globe Temperature
WCS	Worst Case Scenario
WCS	Wildlife Conservation Society
WHO	World Health Organisation
WPF	Wind Power Farm
WPFW	West Pacific Flyway
WRI	World Resource Institute
WSDI	Warm spell duration index
WTG	Wind Turbine Generator
WWF	World Wide Fund for Nature

11. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

11.1 INTRODUCTION AND OBJECTIVES

Through a systematic assessment, the ESIA has identified a number of environmental and social risks and impacts, which may potentially result from the construction, and operation phases of the Project. In order to manage and mitigate these impacts, a range of measures have been developed to eliminate or reduce the adverse environmental and social impacts to acceptable levels and as low as reasonably practicable. These mitigation measures and the actions needed for implementation of these measures are presented in Environmental and Social Management Plan (ESMP).

The key objectives of this ESMP are to:

- Demonstrate commitment to compliance with applicable laws, regulations and executed Project agreements through documented plans and procedures;
- Collate the various mitigation and management measures developed and identified throughout the ESIA Report into a single point;
- Define monitoring requirements to determine the efficacy of all mitigation and management measures;
- Provide clear roles and responsibilities as to what impacts have been identified, how they will be mitigated and managed, and through what means; and
- Provide input into the overall suite of management actions which will be incorporated and implemented through the Environmental and Social Management System (ESMS), if deemed necessary.

This Chapter provides information and instruction on how environmental and social commitments of the Project will be managed from development through to the construction, operation and decommissioning phases. The ESMP is a living document which:

- Incorporates the environment and social mitigation measures identified as a result of the ESIA process into a comprehensive framework to facilitate and ensure appropriate management throughout the Project lifecycle;
- Provides a framework for incorporating commitments into the Project plans and procedures for activities that have risks, as identified in the Impact Assessment (IA);
- Presents responsibilities for meeting ESMP requirements, including the provision of trainings;
- Provides a framework for the implementation of specific management plans by the Engineering Procurement and Construction (EPC) and O&M contractor and sub-contractors; and
- Defines the monitoring/verification and reporting program (including corrective actions).

NZE will provide this ESMP to each Project's contractor and/or sub-contractor in order to ensure that they comply with ESMP actions during their scope of work under their contracts. The ESMP will be translated into Mongolian, if needed, at the Project Site. NZE will implement a contractor and/or E&S management mechanism to ensure their compliance and to monitor their environmental and Social (E&S) performance under the Project Environmental and Social Management System (ESMS).

An effective ESMP is a dynamic and continuous process initiated and supported by management, and involves engagement between the Project proponent, its workers, local communities directly affected by the Project (the Affected Communities) and, where appropriate, other stakeholders.[1] It is also an established business management process to "plan, do, check, and review/act," (ISO 14001:2015[2]) and this ESMP provides the framework for how NZE intends to manage its environmental and social risks and requirements in a structured way on an ongoing basis, as depicted in ***Figure 11-1***.

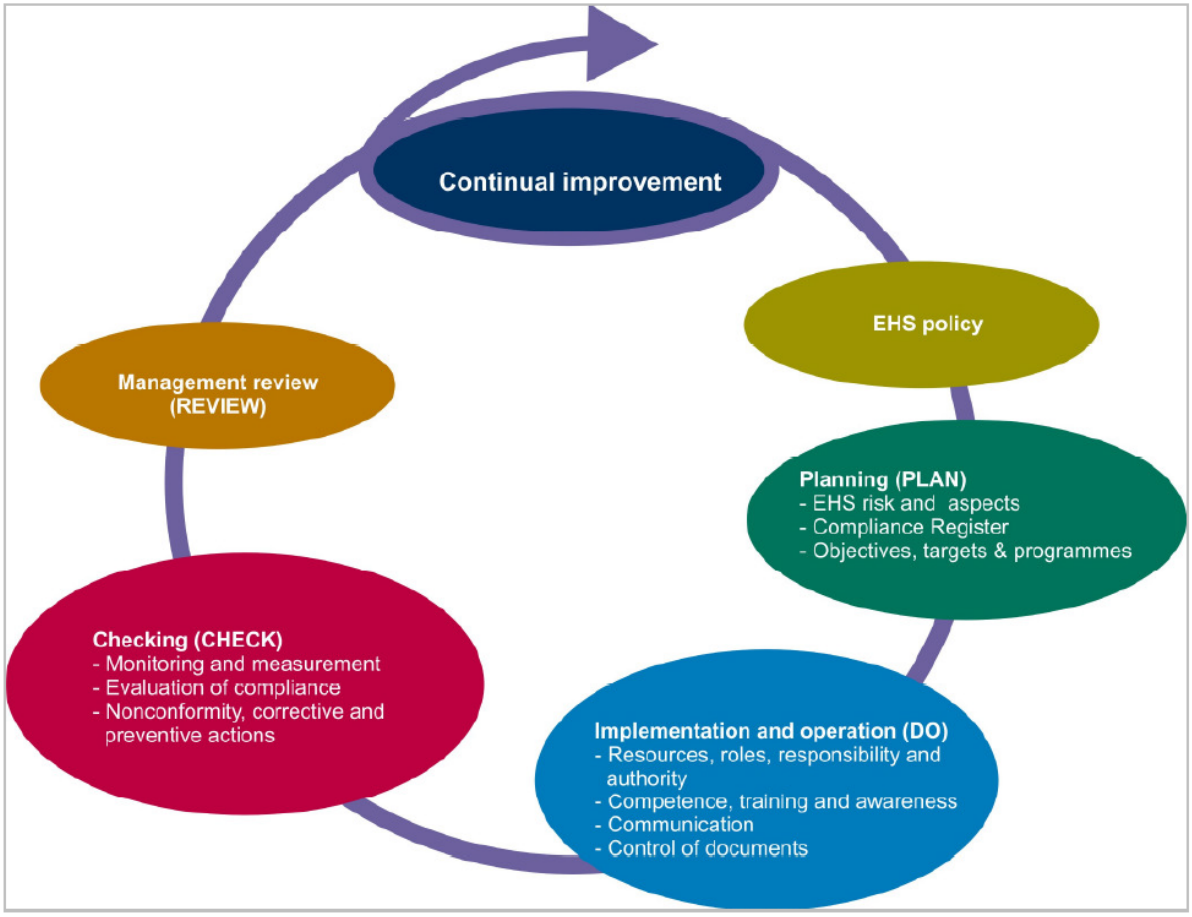


FIGURE 11-1: SYSTEM FRAMEWORK – PLAN, DO, CHECK REVIEW CYCLE

11.2 RESPONSIBILITIES FOR ESMP IMPLEMENTATION

Key parties involved in the project management, include the following:

- **Project Proponent:** NZE
- **Equipment Supplier:** [redacted]
- **Construction contractor:** [redacted]
- **O&M contractor:** [redacted]

In terms of key parties and their primary roles in implementing the ESMP, NZE will develop its ESMS to be in place prior to commencement of the Project. At the time of writing, NZE

[1] IFC PS1 Performance Standard 1: Social and Environmental Assessment and Management Systems
[2] ISO 14001 Environmental Management Systems Certification (2015).

organizational structure and responsibilities under the ESMS are under development. At a minimum, NZE should outline the ESMS implementation hierarchy as follows.

NZE Project Management Team (PMT)

The Project Management Team holds overall accountability for environmental and social performance of the Project. The PMT is responsible for providing strategic oversight, ensuring that ESMP commitments are properly integrated into project planning, procurement, scheduling, and decision-making processes. It will ensure compliance with applicable national regulations, international standards requirements, and corporate policies, approves resources (personnel, budget, and training) required for effective ESMP implementation, and endorse corrective actions where non-compliances or unforeseen impacts arise. The PMT also acts as the primary interface with regulators and senior stakeholders on environmental and social matters.

NZE Environmental and Social (E&S) Team

The Environmental and Social Team is responsible for the day-to-day management, coordination, and technical oversight of ESMP implementation. This includes developing method statements, supervising monitoring programs, conducting site inspections, reviewing contractor compliance, and maintaining environmental and social records and reporting systems. The E&S Team ensures mitigation measures are implemented effectively, manages stakeholder engagement and grievance mechanisms, and provides technical guidance to project officers and contractors. It also supports compliance audits, prepares periodic environmental and social performance reports, and advises the PMT on risks, trends, and necessary corrective or preventive actions.

NZE Project Officers / Site Supervisors

Project Officers are responsible for implementing ESMP requirements at the site level and ensuring that daily construction and operation activities comply with approved environmental and social procedures. They coordinate closely with the E&S Team to apply mitigation measures, conduct toolbox talks, monitor contractor performance, and promptly identify and report incidents, non-compliances, or community concerns. Project Officers also facilitate access for inspections and monitoring, maintain site-level registers and records, and ensure that corrective actions are implemented within agreed timelines.

EPC Contractors and Subcontractors

EPC Contractors are responsible for complying with all applicable ESMP requirements, contractual environmental and social obligations, and relevant laws and standards during construction and related activities. This includes preparing and implementing contractor ESMPs (C-ESMPs), method statements, and occupational health and safety plans consistent with the project ESMP. Contractors must provide suitably trained personnel, maintain required monitoring and records, cooperate during inspections and audits, and promptly address non-compliances or incidents. Subcontractors are required to adhere to the same standards under the supervision and accountability of the main EPC contractor.

11.3 TRAINING, AWARENESS AND COMPETENCY

It is expected that the Project would implement a training and awareness program covering EHSS expectations of the Project. As a minimum, this should be implemented during induction

for all Workers (i.e., all Employees, Non-Employees, contracted, sub-contracted and Tier 1 Supply Chain Workers) engaged in the Project's construction, with further training given depending on the level of responsibility for implementing HSE and social expectations and exposure to environmental and safety risks.

The Project should ensure that all personnel responsible for the implementation of this ESMP are competent on the basis of education, training and experience. All personnel shall be provided with an E&S training appropriate to their scope of work and level of responsibility.

11.4 MONITORING, REVIEW, AUDIT AND REPORTING

A monitoring, review and auditing program would be implemented during construction and operation phases to monitor implementation of the Project's EHS requirements and commitments as defined under Project ESMS. The inspections and audits will be done by the Project identified EHSS specialists in coordination with O&M contractors and other external agencies identified. The entire process of monitoring and audits should be documented.

It is recommended NZE will develop and implement a program of reporting through all stages of the Project lifecycle. Delegated personnel shall require to fully complying with the reporting program in terms of both timely submissions of reports as per acceptable level of detail. Reporting will be done in form of environmental check list, incident record register, environmental and social performance reports (weekly, monthly, and quarterly, half yearly, yearly etc.).

Reporting for E&S Performance should be agreed with the Lenders. Apart from internal monitoring, external monitoring is also recommended to be conducted for the ESMP implementation by independent social and environmental experts.

11.5 PROJECT ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

The development of an ESMP is a compliance requirement for any project or activity with the potential to impact upon the physical, chemical, biological, environmental, health and social. In this instance, it provides guidance and a framework for ensuring that the commitments of NZE, made within this ESIA are upheld and that the EHS impacts of the Project are managed to an acceptable level and in accordance with the requirements of the Project's ESIA.

Specifically, this ESMP pulls together the mitigation measures and management actions identified within the ESIA as necessary during the construction and operation phases of the Project.

The mitigation and management measures occur throughout the Project's lifetime, from development through to construction and operation. In addition, there are common mitigation and monitoring requirements that apply to all phases of the Project, e.g., vehicle use/operation. Fund source to support ESMP implementation will be a part of total investment cost of the Project.

The mitigation and monitoring measures specific to the impact assessment conducted for this Project's ESIA are detailed **in Chapter 7: Environmental Impact Assessment**, **Chapter 8: Social Impact Assessment** and **Chapter 9: Unplanned Events Impact Assessment**, together with information on:

- Relevant phase and activity;

- Impact summary and receptor impacted;
- Mitigation measures, responsibility and timing;
- Monitoring requirements, responsibility and timing; and
- Reporting requirements.

Where specific mitigation measures cannot be adequately defined due to lack of Project information or uncertainty regarding the environmental or social baseline, recommendations for the development of specific management plans or procedures or follow-up actions have been made.

This ESMP is a live document and will be updated periodically, depending on the Project progress and performance.

11.6 MANAGEMENT PLANS AND POLICIES IN SUPPORT OF THE ESIA

In addition to this ESMP, NZE is progressing standalone management plans, procedures and policies in support of this ESIA.

11.6.1 EXISTING PLANS AND POLICIES

[redacted] (parent company of NZE) has developed a set of plans, procedures and policies to manage the corporate overall environmental and social risks, which can be adapted to the Project as shown in ***Table 11-1***.

Some limitations on these plans are noted as follows. These ESMS and HR plans provided by the Client are considered to serve as generic frameworks implemented by [redacted] across its corporations and serve as reference plans for this Project. It is understood that generic measures in the plans will be applied for the Project. The measures outlined in these plans, are treated as embedded measures within this ESIA Report where stated in the impact assessment chapters (***Chapters 7*** and ***8***). Additional measures have been proposed under the assumption that the Client is committed to implementing the measures specified in the provided plans where specified in the IA chapters.

As previously discussed in IA Methodology (***Chapter 4***) - The mitigation measures outlined in the DEIA are considered as embedded measures within this ESIA Report. Additional measures have been proposed under the assumption that NZE is committed to implementing the measures specified in the DEIA.

TABLE 11-1: OVERVIEW OF NZE'S EXISTING PLANS AND POLICIES

#	Plans and Policies	Description
1.	Human Resource Management Plan (HRMP)	• Setting out how the project workforce will be recruited, managed, and supported, including workforce categorization, hiring procedures, wages and employment conditions, training and capacity building, subcontractor requirements, and a mechanism for workers to raise and resolve grievances.
2.	Labor Management Plan (LMP)	• Outlining the arrangements for managing project labour in line with legal and international standards, covering workforce planning; recruitment and employment conditions; occupational health and safety; fair remuneration and benefits; prevention of child and forced labour; respect for freedom of association and labour rights;

#	Plans and Policies	Description
		promotion of gender equality and social inclusion; procedures for termination and retrenchment; and a grievance redress mechanism for workers.
3.	Procurement Plan (PP)	• Describing the approach for sourcing goods and services in a transparent and responsible manner, including the definition of local suppliers, application of local procurement preference, indicative sourcing of construction materials, supplier qualification requirements, outreach to local suppliers, and clear roles, responsibilities, monitoring, and reporting arrangements to track procurement performance.
4.	Livelihood Restoration Plan (LRP)	• Outlining measures to restore and improve the livelihoods of project-affected persons through defined impact categories, entitlement frameworks, implementation arrangements, a grievance mechanism, and clear roles, budgeting, monitoring, and reporting.
5.	Resettlement Action Plan (RAP)	• Setting out eligibility, compensation and entitlements, contingency measures for physical displacement, consultation and disclosure processes, and the institutional and resource arrangements to ensure effective implementation and oversight.
6.	Grievance Redress Mechanism Plan (GRMP)	• Providing prevention and protection measures of the human rights standards for all employees, citizens of project affected area, and stakeholders; and • Setting a clear internal process to receive and response to the grievance including compliant and request within the project implementation.
7.	Social and Gender Integration Plan (SGIP)	• Providing overall guidance to all parties involved in the implementation of project on their responsibilities for social inclusion and gender integration in the project; and • Ensuring the effective implementation of the national and international standards to promote social inclusion and gender equality promotion measures within the project implementation.
8.	Occupational Health and Safety Plan (OHSP)	• Setting out measures to identify and manage workplace health and safety risks, including defined roles and responsibilities, risk assessment and permit-to-work systems, training and competency requirements, safe management of high-risk activities, incident reporting, and ongoing monitoring to ensure a safe working environment for all project workers.
9.	Community Health, Safety And Security Management Plan (CHSSMP)	• Outlining measures to identify and manage risks to surrounding communities arising from project activities, including traffic and transport safety, workforce influx, community health and emergency preparedness, and security arrangements, supported by defined roles and responsibilities and systems for monitoring and reporting performance.
10.	Security Service Procedure (SSP)	• Defining the arrangements for managing project security in a responsible and controlled manner, including security organization and personnel vetting, access control and checkpoint operations, rules on use of force, community interface protocols, incident reporting and records management, prohibited conduct, and monitoring of sensitive objects and facilities through surveillance

#	Plans and Policies	Description
11.	Emergency Preparedness and Response Plan (EPRP)	• Defining the framework for identifying, managing, and responding to emergency situations, including emergency classification, roles and responsibilities, contact arrangements, response procedures, incident reporting, training and emergency drills, as well as systems for monitoring preparedness and response effectiveness.
12.	Chance Find Procedure (CFP)	• Detailing the necessary actions in the event of the discovery of previously unknown heritage resources, particularly archaeological and cultural artifacts, during project construction or operation.
13.	Waste Management Plan (WMP)	• Design to address the construction phases of the Project and facilitate effective waste management through the prevention, reduction, and safe handling, storage, treatment, and disposal of generated waste.
14.	Traffic Management Plan (TMP)	• Setting out measures to manage project-related traffic safely and responsibly, covering vehicle and driver standards, speed control, handling of oversized loads, dust suppression, interaction with herders, livestock and communities, site traffic and parking management, road maintenance, seasonal considerations, incident reporting, worker and community grievance mechanisms, as well as monitoring, reporting, training, and awareness..

11.6.2 ADDITIONAL MANAGEMENT PLANS RECOMMENDED IN THE ESIA

Following the completion of the ESIA, it is recommended to leverage the existing management plans, many of which are largely applicable to the Project. However, the following additional plans/studies are recommended, which are not included in the current Management System:

- Pre-Construction and Construction Phase: Priority Plant Conservation Plan (including Pre-construction Flora Survey Programme and Plant Rescue and Translocation Protocol)
- Pre-Construction and Construction Phase: Invasive Species Management Plan
- Construction Phase: Air Quality Management Plan
- Construction Phase: Heat and Cold Stress Management Plan
- Construction Phase: Flood Emergency Response Plan
- Construction Phase: Water (Usage) Management Plan
- Construction Phase: Community Health, Safety and Security Plan
- Construction Phase: Earthquake Emergency Response Plan
- Construction Phase: Emergency Preparedness and Response Plan
- Post-Construction Phase: Habitat Rehabilitation Plan
- Post-Construction Phase: Full Biodiversity Action Plan
- Post-Construction Phase: Biodiversity Offset Feasibility Study
- Post-Construction Phase: Biodiversity Offset Management Plan
- Operation Phase: Operation Biodiversity Management Plan (including Bird and Bat Adaptive Management, Post-Construction Fatality Monitoring, and Shutdown on Demand Protocol)

11.7 SUMMARY OF IMPACTS AND MITIGATION MEASURES

The ESIA has assessed the potential impacts and proposed mitigation measures to reduce the level of the impact. These potential impacts are summarised in ***Table 11-2*** (Environmental Impacts), ***Table 11-3*** (Biodiversity Impacts), ***Table 11-4*** (Social Impacts), and ***Table 11-5*** (Unplanned Events).

TABLE 11-2: SUMMARY OF ENVIRONMENTAL IMPACTS

Aspect	Significance of Impact	Significance of Residual Impact
Impact on Air Quality		
• Construction Phase • Fugitive Dust Emissions	Negligible to Moderate	Minor
• Vehicular Exhaust Emissions	Negligible	Negligible
Impact on Climate Change (Refer to specific climate hazards in *Section 7.2*)		
Impact on Noise		
• Construction Phase • Typical Construction Noise • Construction Traffic Noise	Minor	Negligible
• Operation Phase • Industrial Noise Wind Turbine, BESS and Substation Noise • Operational Traffic Noise	Negligible	Negligible
Impact on Soil		
• Construction Phase • Potential Impact to Soil	Minor	Minor
Impact on Water Resources		
• Construction Phase • Potential Impact due to Water Resources Competition	Negligible	Negligible
• Potential Impact on Water Quality	Moderate	Negligible
• Operation Phase • Potential Impact due to Water Resource Competition and on Water Quality from Operation Activities	Negligible	Negligible

TABLE 11-3: SUMMARY OF BIODIVERSITY IMPACTS

Impact	Receptor	Significance of Impact	Significance of Residual Impact
Construction Phase			
Direct Loss of Terrestrial Habitat	Habitat	Moderate	Moderate
	Species	Minor	Negligible
Indirect Disturbance to or Displacement of Fauna	Species	Minor	Negligible
Direct Impacts from Barrier Creation	Species	Minor	Negligible
Indirect Degradation of Habitat	Habitats and Species	Negligible to Minor	Negligible
Direct Mortality from Vehicle Collision, Hunting and Poaching	Species	Minor	Negligible
Operation Phase			
Direct Mortality from Collision with Wind Turbines	High Sensitivity Volant Species	Moderate	Minor
	Low and Medium Sensitivity Volant Species	Negligible to Minor	Negligible
Direct Mortality from Collision/ Electrocution from OHL	High Sensitivity Volant Species	Moderate	Minor
	Low and Medium Sensitivity Volant Species	Negligible to Minor	Negligible
Direct Displacement from Barriers	Species	Minor	Negligible

TABLE 11-4: SUMMARY OF SOCIAL IMPACTS

Aspect	Significance of Impact	Significance of Residual Impact
Impacts on local economy and livelihood		
Construction Phase • Workforce mobilisation and presence. • Grazing Land Disturbance	Positive	Positive
	Minor	Negligible
Operation Phase • Operation of WTGs and OHL.	Positive	Positive
Impact on traffic and transportation		
Construction Phase: • Land preparation (site clearance, excavation and levelling), fencing, and civil works • Construction of Access Road, internal roads, WTGs foundations, Substation, BESS and Control Building, and OHL • Equipment and material transportation and supply	Moderate	Minor
Impact on land use		
Temporary land loss during construction phase	Minor	Negligible
Permanent land loss during operation phase	Negligible	Negligible
Cumulative Land Fragmentation	Minor	Minor
Impacts on infrastructure/public services		
Construction Phase • Workforce mobilization and presence.	Moderate	Minor
• Construction of Access Road, internal roads, WTGs foundations, Substation, BESS and Control Building, and OHL.	Minor	Negligible
• Water resource use	Negligible	Negligible
Impacts on occupational health and safety		
Construction Phase • Construction of Access Road, internal roads, WTGs	Minor	Negligible

Aspect	Significance of Impact	Significance of Residual Impact
foundations, Substation, BESS and Control Building, and OHL. • Wastes generation, discharge, handling and disposal during construction. • Equipment and material transportation and supply • Operation of associated facilities such as the concrete batching plant, workers' accommodation facility • Installation of the WTGs, OHL, internal cabling, Substation, BESS and Control Building		
Operation Phase • Wastes generation, discharge, handling and disposal during operation	Negligible	Negligible
Impacts on community, health, safety and security		
Construction Phase • Workforce mobilization and presence	Minor	Negligible
• Equipment and material transportation and supply	Moderate	Negligible
• Health Impacts from Project Construction Activities	Minor	Negligible
• Wastes generation, discharge, handling and disposal during construction.	Minor	Negligible
Operation Phase • Wastes generation, discharge, handling and disposal during operation	Minor	Negligible
Impacts on cultural heritage		
Construction Phase: • Land preparation (site clearance, excavation and levelling), fencing, and civil works • Construction of Access Road, internal roads, WTGs foundations, Substation, BESS and Control Building, and OHL	Minor	Negligible

Aspect	Significance of Impact	Significance of Residual Impact
Impacts on shadow flicker		
Operation of wind turbines during operation phase	Minor	Minor

TABLE 11-5: SUMMARY OF UNPLANNED EVENTS IMPACTS

Aspect	Significance of Impact	Significance of Residual Impact
Leakage and Spill Incident	Negligible	Negligible
Fire and Explosion	Negligible	Negligible
Blade Throw	Negligible	Negligible
Equipment Failure	Negligible	Negligible
Transmission Line Snapping and Transmission Pylon Collapse	Negligible	Negligible
Vehicle Collision	Minor	Negligible

11.8 Environmental and Social Management Plan (ESMP)

The Mongolian Law on the Environmental Impact Assessment (2012), requires the preparation of an Environmental Management Plan, (EMP) to be submitted together with a Detailed Environmental Impact Assessment (DEIA). It is understood that final regulatory approval of the DEIA is pending and will be in place prior to Project commencement. It is understood an EMP, for instance, developed for 5 years, based on the results obtained from the DEIA is also required to be approved by the Ministry of Environment and Climate Change of Mongolia (MECC), who also issued the Detailed Environmental Impact Assessment (DEIA) conclusion. Project Proponent is responsible for developing and getting approval on the annual EMP based on this document. Project Proponent is also responsible for the implementation of the annual EMP.

All the mitigation measures indicated in the EMP and approved by MECC[3] are considered in the ESIA as existing controls[4]. The implementation of these mitigations and their monitoring are to be considered part of the ESIA ESMP.

Please refer to:

- [redacted], Detailed Environmental Impact Assessment, Bilgeh Wind Project; and
- [redacted] Environmental Management Plan (2026-2031), Bilgeh Wind Project.

The approved EMP should be appended to the ESIA EMP and available to the Project staff and contractors and/or sub-contractors.

[3] Pending approval at the time of writing.
[4] Based on the available Draft DEIA dated August 2025. Final DEIA and EMP were not available at the time of writing.

The measures recommended in this ESIA for construction phase operation phase and unplanned events to manage and mitigate those impacts are detailed in ***Table 11-6*** to ***Table 11-8***.

11.8.1 CONSTRUCTION PHASE – ADDITIONAL MITIGATION MEASURES

TABLE 11-6: SUMMARY OF ADDITIONAL MITIGATION MEASURES (CONSTRUCTION PHASE)

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
Air						
Air (Fugitive Dust Emissions)	Section 7.2	• A Construction Air Quality Management Plan (CAQMP)) will be developed and implemented. The CAQMP will contain the measures outlined in this document and a plan for implementation; • Regular site inspections will be performed to monitor compliance with the CAQMP. All inspection results will be recorded, and corrective actions taken where mitigation and management measures are not being implemented effectively (i.e., to reduce dust emissions); • Daily onsite and offsite inspections will be undertaken to visually assess the dust emissions from earthwork and construction activities, and from vehicles exiting the construction sites. Results from the inspection will be recorded and appropriate measures such as those presented in this table will be taken to reduce emissions where necessary; • All dust and air quality complaints will be recorded, the cause identified and appropriate measures such as those presented in this table will be implemented to reduce dust emissions in a timely manner; • The frequency of site inspections will be increased when activities with a high potential to produce dust are being carried out and during prolonged dry and windy conditions; • The Project will keep records of all inspections, dust complaints, and corrective actions. The records will be kept on site and made available for inspection when necessary; • The site layout will be planned so that dust causing activities are located as far as possible from social receptors; • Screens or barriers will be erected around dusty activities or the site boundary that are at least the height of any stockpile on site; • All chutes and skips will be covered at all times; • Drop heights from loading shovels and hoppers will be minimised; • Open burning of waste is not allowed; and • Watering or use of proprietary suppressants will be used to suppress wind and physical disturbance dust generation. The use of water or proprietary suppressants should be carefully managed throughout the Project. During the rain season (typically July-September), rainfall will provide natural suppression for periods of time, however high temperatures will result in rapid evaporation and drying of surfaces. The Project should ensure an adequate water supply and actively manage the use of water for dust suppression. The Project should consider the use of proprietary suppressants in drier months when rainfall is infrequent.	EPC Contractor	• Visual inspection and record keeping.	• Daily during construction phase.	• Daily Inspection Check List; and • Monthly Health, Safety, Environment, and Quality (HSEQ) Report.
Climate Change						
Climate Change (Extreme Heat)	Section 7.3	**Site Personnel** • Implement a comprehensive Heat Stress Management Plan (HSMP) including acclimatization protocols for new workers. • Provide shaded, ventilated rest shelters at all work fronts. • Ensure potable water is available at all work locations, with minimum consumption targets and hydration reminders. • Enforce mandatory work-rest cycles based on Wet Bulb Globe Temperature (WBGT) thresholds. • Issue personal cooling PPE (cooling vests, hats, UV-protective clothing). • Conduct toolbox talks on heat illness recognition and first aid. • Install real-time weather monitoring stations with automated alerts for heatwaves. • Restrict outdoor work during peak heat hours; reschedule to early morning/evening where feasible. • Maintain on-site medical facilities with supplies for heat stroke and dehydration. • Develop and drill emergency evacuation and medical response for heat-related incidents **Wind Farm** • Use heat-resistant materials for turbine components, cabling, and electronics. • Store sensitive equipment in climate-controlled containers. • Schedule heavy lifts and assembly outside forecasted heatwaves. • Install temporary shade structures for assembly areas. • Monitor and log ambient and equipment temperatures during construction. • Apply reflective coatings to exposed surfaces to reduce heat absorption.	• EPC Contractor / NZE	• Visual inspection and record keeping; and • Internal Grievance Log.	• Once before start of construction; • Monthly during construction phase; • Weekly during extreme heat period.	• Monthly Health, Safety, Environment, and Quality (HSEQ) Report; and • Monthly Internal Grievance Log report.

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		• Ensure all lubricants and hydraulic fluids are rated for high temperatures. • Inspect for thermal expansion or warping of structural elements. **BESS** • Store batteries and power electronics in temperature-controlled, dust-sealed enclosures. • Install redundant HVAC systems with backup power for cooling. • Use thermal insulation and reflective barriers on BESS containers. • Conduct pre-installation thermal stress testing on all units. • Develop emergency shutdown and fire suppression protocols for thermal runaway. • Monitor battery temperature and humidity in real time. • Train staff in handling and containment of overheated or damaged batteries. **OHL** • Use conductors and insulators rated for high ambient temperatures. • Schedule stringing and tower erection outside peak heat periods. • Monitor for thermal sag and adjust tension accordingly. • Provide mobile shade and hydration stations for line crews. • Inspect for UV degradation of insulators and fittings. • Apply anti-corrosion and anti-UV coatings to exposed hardware. **Access Road** • Apply dust suppression (water, polymers) to prevent surface degradation. • Inspect for cracking, rutting, and softening of road surfaces. • Restrict heavy vehicle movement during extreme heat to prevent road damage. • Use heat-resistant surfacing materials where feasible. • Maintain emergency access routes and signage for rapid evacuation				
Climate Change (Extreme Cold)	Section 7.3	**Site Personnel** • Implement a Cold Stress Management Plan (CSMP) with acclimatization and health monitoring. • Provide heated shelters and warming stations at all work fronts. • Issue insulated PPE (thermal gloves, boots, layered clothing, face protection). • Enforce work-rest cycles based on wind chill and temperature thresholds. • Conduct toolbox talks on frostbite, hypothermia, and safe work practices. • Maintain on-site medical supplies for cold-related injuries. • Schedule outdoor work for midday when temperatures are highest. • Provide heated break rooms and hot beverages. • Monitor and record worker exposure times in extreme cold. **Wind Farm** • Use cold-rated lubricants, greases, and hydraulic fluids. • Store components in heated or insulated containers. • Pre-heat equipment before operation. • Inspect for ice accretion on blades and towers; implement de-icing protocols. • Use anti-icing coatings or heating elements on critical components. • Schedule major lifts and assembly outside severe cold periods. • Monitor for embrittlement or cracking of materials. **BESS** • Store batteries in heated enclosures; maintain minimum temperature setpoints. • Use battery chemistries rated for sub-zero operation. • Install redundant heating systems with alarms for HVAC failure. • Monitor battery performance and charge/discharge rates for cold-induced degradation. • Train staff in safe handling of cold-affected batteries **OHL** • Use conductors and insulators rated for ice and cold. • Inspect for ice loading and sag; implement emergency de-icing if needed. • Schedule works to avoid periods of heavy snow/ice. • Provide heated shelters and PPE for line crews. • Monitor for frost heave or movement at tower foundations.	• EPC Contractor / NZE	• Visual inspection and record keeping; and • Internal Grievance Log.	• Once before start of construction; • Monthly during construction phase; and • Weekly during extreme cold period.	• Monthly Health, Safety, Environment, and Quality (HSEQ) Report; and • Monthly Internal Grievance Log report.

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		Access Road • Apply sand/grit for traction on icy surfaces. • Inspect for frost heave, potholes, and ice accumulation. • Restrict access during severe ice or blizzard conditions. • Maintain snow removal equipment and emergency supplies. • Monitor and repair road surfaces after freeze-thaw cycles.				
Climate Change (Extreme Rainfall and Flooding)	Section 7.3	**Site Personnel** • Develop a Flood Emergency Response Plan (FERP) with evacuation routes and muster points. • Monitor weather forecasts and real-time rainfall data. • Halt work and evacuate personnel during heavy rain or flood warnings. • Provide waterproof PPE and high-visibility gear. • Train staff in flood hazard recognition and response. **Wind Farm** • Design foundations and critical infrastructure above projected flood levels. • Install temporary drainage and dewatering systems at construction sites. • Use water-resistant materials and sealants for below-grade works. • Schedule excavation and concrete pours outside rainy season. • Implement erosion and sediment control (ESC) measures (silt fences, sediment basins). • Inspect for water ingress and foundation stability after storms. **BESS** • Elevate BESS containers above floodplain; use waterproof enclosures. • Install perimeter drainage and sump pumps with alarms. • Conduct regular inspections for water ingress. • Develop emergency shutdown and isolation procedures for flooding. **OHL** • Site towers outside flood-prone areas where possible. • Use deep pile or caisson foundations in floodplains. • Inspect for scour and soil instability after heavy rain. • Maintain access for emergency repairs during/after floods. **Access Road** • Design roads with adequate cross-drainage and culverts. • Inspect for erosion, washouts, and debris after storms. • Restrict access during/after flooding; maintain detour plans. • Use geotextiles and erosion control mats on vulnerable slopes.	• EPC Contractor / NZE	• Visual inspection and record keeping; and • Internal Grievance Log.	• Once before start of construction; • Monthly during construction phase; and • Immediate after extreme rainfall and flooding event.	• Monthly Health, Safety, Environment, and Quality (HSEQ) Report; and • Monthly Internal Grievance Log report.
Climate Change (Water Stress and Drought)	Section 7.3	**Site Personnel** • Develop a Water Management Plan with usage targets and restrictions. • Install water meters and log daily consumption. • Provide water conservation training and signage. • Ensure backup potable water supplies (tanks, deliveries). • Monitor worker hydration and health **Wind Farm** • Use water-efficient dust suppression (polymers, recycled water). • Schedule water-intensive activities during periods of higher availability. • Monitor and report all water withdrawals. • Implement rainwater harvesting for non-potable uses. **BESS** • Use dry cleaning methods for dust removal where possible. • Monitor HVAC water use and optimize for efficiency. • Maintain emergency water supplies for fire suppression **OHL** • Use water-efficient construction methods. • Monitor for dust accumulation and clean as needed.	• EPC Contractor / NZE	• Visual inspection and record keeping; and • Internal Grievance Log.	• Once before start of construction; • Monthly during construction phase; and • Weekly during water stress and drought period.	• Monthly Health, Safety, Environment, and Quality (HSEQ) Report; and • Monthly Internal Grievance Log report.

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		• Avoid water-intensive activities during drought. **Access Road** • Use alternative dust suppression (e.g., gravel, polymers) during water shortages. • Monitor for increased dust and surface degradation. • Restrict non-essential vehicle movement during severe drought.				
Climate Change (Earthquake)	Section 7.3	**Site Personnel** • Develop and drill an Earthquake Emergency Response Plan. • Secure all temporary structures, scaffolding, and storage containers. • Train staff in earthquake safety, evacuation, and first aid. • Maintain emergency supplies (first aid, water, food, radios **Wind Farm** • Design all foundations and structures to relevant seismic codes. • Use flexible connections for cabling and piping. • Inspect for structural damage after seismic events. • Maintain spare parts for rapid repairs **BESS** • Anchor all containers and racks to seismic standards. • Use flexible connections for electrical and HVAC systems. • Inspect for battery displacement or damage after earthquakes. **OHL** • Design towers and foundations for seismic loads. • Use flexible joints and dampers where appropriate. • Inspect for misalignment, foundation movement, or conductor damage after earthquakes. **Access Road** • Inspect for cracking, settlement, or landslides after seismic events. • Maintain emergency detour plans and rapid repair capability.	• EPC Contractor / NZE	• Visual inspection and record keeping; and • Internal Grievance Log.	• Once before start of construction; • Monthly during construction phase; and • Immediate after earthquake event.	• Monthly Health, Safety, Environment, and Quality (HSEQ) Report; and • Monthly Internal Grievance Log report.
Noise						

Noise	Section 7.4	• Notify the local communities and herders on the schedule and location of construction work well in advance to allow herders to establish a settlement at an adequate distance from the designated construction sites;
		• During construction of the Project, good practice construction noise mitigation and management measures should be implemented to minimise noise impact levels as far as practicable. A range of mitigation and management measures are available and those that are considered feasible, reasonable and practical to implement the specific tasks:
		  ○ Avoid using multiple high noise emitting machines and equipment simultaneously at the same specific location;
		  ○ Schedule high noise emitting construction activities to less sensitive times for the local communities and herders, such as when they are not at that location during specific times of the day;
		  ○ Limit the number of heavy vehicles required for the Project to only those that are necessary;
		  ○ Heavy vehicles should limit use of engine breaking to prevent excessive noise;
		  ○ Strictly comply with technical requirements in the process of installing equipment and machines; and
		  ○ Ensure all machines used on the site are in good working conditions and fully maintained, with particular emphasis on exhaust silencers, covers on engines and transmissions and squeaking or rattling components. Excessively noisy machines should be repaired or removed from the site.
		• Any works that are required during the night-time period (10pm to 7am) should be notified prior to local communities, justified and task-specific noise mitigation and management measures should be implemented to reduce noise impacts to acceptable levels. These additional measures should consider the potential for sleep disturbance impacts that could occur during the night-time period due to “peak” or “maximum” noise level events e.g. metal on metal contact, or general clangs and bangs.
			• EPC Contractor / NZE	• Visual inspection and record keeping; and
				• External Grievance Log.
					• Daily during construction phase.	• Daily Inspection Check List;
						• Monthly Health, Safety, Environment, and Quality (HSEQ) Report; and
						• Monthly External Grievance log report.

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		• Works associated with the OHL and access road construction often require activities in closer proximity to receptors. In these circumstances, task-specific noise mitigations and management measures should be implemented (when works are close to receptors) to reduce noise impacts as practical as possible; • If any validated noise complaints are received through the grievance mechanism, the problem source and any potential noise reducing measures should be identified and evaluated for implementation during the works. If the noise complaint cannot be validated, no further mitigation or management measures are required.				
Soil						
Soil (Potential Impact to Soil)	Section 7.5	• Topsoil stripping activities during the construction phase shall comply with the standard MNS 5916:2008 and adhere to recommendations made by environmental experts and technical conditions for civil works; • Topsoil stripped from all the construction areas should be temporarily stored separately from other soils and excavated materials and be used for the rehabilitation of temporary roads used during construction phase and other suitable locations; • Topsoil stockpiling should be performed in accordance with the technical conditions for civil works; • Topsoil removed from the construction area of WTGs and OHL poles should be used for rehabilitation of nearby landscape; lower-level soils and rocks removed should be used for permanent backfill and protection dams of unpaved roads and Substation, as appropriate; • Implement a procedure prohibiting vehicles to travel on unapproved routes during construction phase; • Implement the following measures to reduce the risk of soil contamination from contaminants and spills that may occur during storage and refuelling of materials and fuel. These include: o No waste will be stored on bare soil, possible leakages and contaminated runoff waters from waste storage areas will be prevented; o Regular mechanical inspections should be routinely carried out to prevent fuel, oil and other liquids spills from vehicles and equipment used during construction and operation phases; o Materials that may pollute groundwater shall be stored on impermeable materials such as concrete and geomembrane to prevent flowing of materials through storm water drainage and rainwater; oil binding techniques should be utilized as appropriate. The spillage reservoirs should be constructed with sufficient capacity to store the entire contents of the storage tank with flammable lubricant materials. Secondary containment for fuel storage tank used: o Contaminated soil will be dug and disposed as hazardous waste; o Spill and leakage control procedures will be implemented; o Flammable lubricant materials storage tank, pipes and valves should be regularly checked for wear and tear and be replaced, if necessary; o In the event of a spillage or leakage from the storage tanks, proper pumps for collecting and special absorbent materials should be adequately placed at the location. Trays should be regularly inspected and cleaned to remove any accumulated residues; and o Ensure controls are in place to prevent leaving the vehicle unattended while refuelling and regularly check that the valve of the tank containing flammable lubricant materials is not left open. • Implement measures to prevent soil degradation: o Maintain approved routes for maintenance vehicles when accessing Substation, BESS, WTGs, OHL and carry out necessary road maintenance works; o Road condition should be regularly inspected for any damaged road section; vehicles should be navigated to travel around the damaged road section; required road maintenance works should be carried out (if necessary); and o Monitor soil and vegetation cover during the operation phase, based on research and regional climate data to determine whether the vegetation is growing again on areas affected by groundworks during the construction phase of the Project.	• EPC Contractor	• Visual inspection and record keeping.	• Monthly during construction phase; and • Weekly during earthworks and land preparation activities during construction.	• Monthly Health, Safety, Environment, and Quality (HSEQ) Report.
Water						

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
Water Resources (Potential Impact due to Water Resources Competition)	Section 7.6	**Water Conservation** • Project will develop a Water (Usage) Management Plan, which will serve to enhance water use efficiency for the Project. • Project Proponent shall have internal control unit, necessary equipment and appointed water utility officer as stipulated in the Law on Water (Article 30.1.2) and Law on Environmental Protection (Article 31.7); • Optimum use of water during sprinkling on roads for dust suppression, concrete mixing for WTGs' foundation, etc.; • Minimization of water consumption for domestic and potable purposes through environmental awareness trainings for workers at the accommodation facility, • Regular routine inspection for the identification of water leakages and to prevent wasting water from water tankers (if used); • Recycling and reusing water to the extent possible • **Good Practice Measures** • The Conditions associated with each water use approval should be followed, and adherence to such should be monitored and confirmed through routine inspections and / or audits. • Monitoring of water consumption should be used to identify over-consumption and provide a basis for increasing water efficiency. •	• EPC Contractor • Project Proponent	• Visual inspection and record keeping. • Water (Usage) Management Plan	• Daily during construction phase.	• Daily Inspection Check List; and • Monthly Health, Safety, Environment, and Quality (HSEQ) Report.
Water Resources (Potential Impact on Water Quality)	Section 7.6	**Sewage from workforce** • Temporary sanitary facilities, such as portable toilets, shall be provided on-site during the early stages of work and construction phase. Sufficient toilets at active work areas should be provided for site staff and workers and these should be serviced regularly by a competent and suitably qualified person. • Sewage from toilets, kitchen and similar facilities produced at sites without sewage facilities, will be collected and treated offsite. This will require transport off-site to approved treatment facilities; • Sewage treatment facilities (septic tank and sewage storage tank) at construction and associated facility site shall be provided with sufficient capacity to treat sewage from the peak workforce. • A specialised contractor should be responsible for regular collection of sludge from septic tanks and disposal of the sewage off site. • The septic tanks shall be well maintained for effective operation. • Direct disposal of domestic wastewater into surface waters will not be allowed. The temporary toilet and domestic wastewater facilities should be managed in a manner that results in zero discharge of raw sewage to the environment • **Concrete batching plant** • Run off from cement area at the concrete batching plant shall be strictly controlled and contaminated water shall be collected, stored and either treated or disposed offsite, at an approved location. **General** • Regular mechanical inspections should be routinely carried out to prevent fuel, oil and other liquids spills from vehicles and equipment used in construction phase • Materials that may pollute groundwater shall be stored on impermeable materials (such as epoxy coated concrete), to prevent flowing of materials through storm water drainage and rainwater; oil trap techniques should be utilized as appropriate; • Flammable lubricant materials storage tank pipes and valves should be regularly checked for wear and tear and be replaced, if necessary; • In the event of a spillage or leakage from the storage tanks, proper pumps for collecting and special absorbent materials should be adequately placed at the location. Trays and blind pits, if any, should be regularly inspected and cleaned to remove any accumulated residues; • Ensure controls are in place to prevent leaving the vehicle unattended while refuelling and regularly check that the valve of the tank containing flammable lubricant materials is closed tight; • Sedimentation control measures will be taken for disturbed areas and around stockpiling areas to prevent sediment-laden water flow. • Ad hoc washing of construction vehicles in watercourses shall be strictly prohibited.	• EPC Contractor •	• Visual inspection and record keeping.	• Daily during construction phase.	• Daily Inspection Check List; and • Monthly Health, Safety, Environment, and Quality (HSEQ) Report.

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
Biodiversity						
Biodiversity (General)	Section 7.7	• Develop the full Biodiversity Action Plan (BAP) for the Project based on the Framework BAP to mitigate residual impacts on natural habitat and PBFs and achieve no net loss of these biodiversity values. The BAP must document all related objectives, management measures, monitoring requirements, implementation arrangements, roles and responsibilities. The BAP should also be developed in consultation with relevant stakeholders such as government entities, external experts, conservation organisations, and affected communities.	Project Proponent & Biodiversity Specialist(s)	• Completed BAP	• N/A	• As needed with external stakeholders and lenders
Biodiversity General	Section 7.7	• Develop an Operation-phase BMP prior to the end of construction to capture all embedded controls and all additional mitigation, management, and monitoring measures listed in the ESIA, as well as document the roles and responsibilities of all parties, implementation schedule, and timeline for regular review and update.	Project Proponent & Biodiversity Specialist(s)	• Completed Operation-phase BMP	• N/A	• As needed with external stakeholders and lenders
Biodiversity (Direct Loss of Terrestrial Habitat)	Section 7.7	Develop and implement a Priority Plant Conservation Plan (PPCP), which should include the following: • Conduct pre-construction surveys targeting flora species prior to the start of any site clearance, earthworks, or land preparation activities. Qualified ecologists must be engaged to carry out such flora surveys and record the presence of any species of conservation significance in areas to be cleared, i.e. globally threatened, legally protected and/or restricted-range/endemic species, including the PBF species *Amygdalus mongolica*. These surveys should be carried out within the footprint of the foundations of WTGs, OHL towers, access roads and other planned temporary and permanent Project facilities. If plant species of conservation significance are found, these individuals must be documented clearly with photographs and georeferenced locations. • Based on the results of the pre-construction flora surveys, undertake micro-siting of all areas to be cleared for access roads, OHL tower foundations, and temporary facilities to avoid removal of flora species of conservation significance that are present in the areas to be cleared, where possible. Where there is limited room for movement of pre-agreed infrastructure locations, the focus will be on identification of opportunities for micro-siting (e.g. movement of infrastructure less than 300 m). Where infrastructure is more location-flexible (e.g. temporary structures like laydown areas, camps), full opportunities will be considered for micro- and larger-scale re-siting of such infrastructure. Micro-siting should be explored fully where there are protected/threatened plant species present that cannot be easily transplanted (e.g. those with fragile root systems). Where full avoidance of areas with flora species of conservation significance is not possible, constraints that make micro-siting impossible (e.g. topography) will be clearly documented. • Where flora of conservation significance are retained on-site and will not be removed, a 50 m exclusion buffer will be established and clearly demarcated using visible signage and flags/markers (and temporary fencing if appropriate) around these individuals. For any flora of conservation significance that are not directly affected by site clearance but are located within 50 m of planned construction works areas, these will also be clearly demarcated and applied an exclusion buffer to avoid accidental clearing. Demarcation shall be maintained throughout construction and reinstated immediately if damaged or displaced. All staff will be informed on the locations of any flora exclusion buffers. • Where construction activities are undertaken near flora exclusion buffers, vehicle and anthropogenic movements must be restricted to approved access routes and stockpiling should be prohibited near buffer boundaries. • For flora of conservation significance where removal cannot be avoided, a Plant Rescue and Translocation Protocol will be developed to transplant these individuals to suitable nearby habitats that are not subject to disturbance, or to on-site areas that will be rehabilitated after construction. Any action to remove and transplant legally protected species must comply with relevant national laws and regulations, such as payment of fees and/or obtaining relevant permits or licences and will be subject to the relevant authority/ies' decisions. • All individuals that are retained on-site or translocated should be monitored for survival rate for at least three years. • For flora of conservation significance where removal is unavoidable and translocation is not feasible, compensatory planting must be undertaken for cleared individuals. This can be integrated into the Habitat Restoration Plan discussed below.	Project Proponent/ EPC Contractor & Biodiversity Specialist(s)	• Completion of PPCP prior to start of construction • Completion of pre-construction flora surveys • Completion of micro-siting • Establishment and visual inspection of exclusion buffers for flora species retained on-site • Completion of PRTP • Completion and monitoring of translocated flora species	• Weekly checks and progress reporting • Monthly progress reporting of PPCP implementation • Quarterly monitoring of PRTP implementation	• Priority Plant Conservation Plan (PPCP) • Plant Rescue and Translocation Protocol (PRTP) • Habitat Rehabilitation Plan (HRP) • Monthly/ Quarterly HSEQ Report
		Access restriction and demarcation: • Areas planned for vegetation clearance shall be clearly determined and demarcated to avoid accidental clearing.	Project Proponent / EPC Contractor	• Regular compliance checks (site inspections and	• Daily checks of non-compliance	• Daily Inspection Check List

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		• Limit clearance of vegetation to the Project footprint only. Monitor habitat clearance closely during construction to minimise risk of inadvertent additional clearing. Where feasible, vegetation should be cut to ground level rather than completely stripped to preserve soil and seed banks. • Restrict all construction activities including soil stripping, vegetation clearing, earthworks, access road construction, grading, etc. to the footprint of individual facilities only and as per the approved construction plan. • Implement a procedure prohibiting vehicles to travel on unapproved routes during construction phase. During the construction phase, movement of vehicles will be prohibited outside of 100-meter corridor from the OHL and approved routes will be strictly followed.		record keeping) along all demarcated boundaries, and implementation of corrective actions in cases of non-compliance. • Training records (including attendance and content). • Records of non-compliances to Project rules and protocols are to be kept and regularly updated. Corrective actions to non-compliances to be undertaken immediately.	• Immediate conduct of any necessary corrective actions • Monthly reporting during construction • Quarterly training •	• Ad hoc Incident/ Corrective Actions Report • Monthly HSEQ Report
		Develop and implement a post-construction Habitat Rehabilitation Plan (HRP) for temporary areas used during construction (e.g. storage, laydown, and crane installation areas). The HRP should be prepared by qualified ecologists prior to the end of construction and integrated into the Project's Biodiversity Management Plan or developed as a standalone plan to be implemented in conjunction with the BMP. The HRP should evaluate options for passive natural recovery and/or active/assisted restoration (or a combination of the two), depending on the habitat type characteristics and known responses from literature/case-study examples. This Plan should also include all related embedded measures in the DEIA, as well as the following (at minimum): • Following the dismantling/decommissioning of temporary areas/facilities utilised during construction (e.g. temporary laydown areas, storage areas, etc.), post-construction habitat restoration and revegetation should be carried out in all disturbed areas using native flora species. All habitat restoration and planting methodologies to be used, native species to be planted, adaptive management measures, monitoring requirements, roles and responsibilities, and implementation timeline should be clearly documented in the HRP. • Compensatory planting for any flora of conservation significance that are removed to be carried out as part of habitat rehabilitation activities. • Embedded measure includes habitat rehabilitation and revegetation for "areas impacted by waste and newly created roads". Adjacent areas affected by construction works as well as areas affected by installation works during the construction phase should also be rehabilitated in accordance with the surrounding land surface and create conditions for plant growth. • Topsoil stripped from all construction areas will be temporarily stored separately from other soils and excavated materials will be used for the rehabilitation of temporary roads used during construction phase and other suitable locations. • Topsoil removed from the construction area of WTGs and OHL poles will be used for rehabilitation of nearby landscape, while lower level soils and rocks removed will be used for permanent backfill of BESS/substation. • Maintain the original soil layering and do not mix topsoil and subsoil layers. Reinstate soils in the reverse order (subsoil, then topsoil). Protect the reinstated bare soil surface with a physical barrier, such as a thin layer of mulch or geotextile/erosion control matting. • All disturbed soil surfaces will be stabilized using temporary cover crops during construction. Long-term stabilization is to occur using a mix of species native to the area and suitable to local soil and climate characteristics to stabilise disturbed soil surfaces. All stabilized areas are to be monitored and maintained following construction activities. • Avoid compaction of soils, for example though excessive vehicle tracking, and rip soils where compacted to allow for vegetation growth.	Project Proponent / EPC Contractor & Biodiversity Specialist(s)	• Completion of HRP • Monitoring of habitat rehabilitation and revegetation progress and success/failure, including regular inspections to determine plant establishment. Where plant establishment has failed, corrective action is to occur.	• Quarterly	• Monthly/ Quarterly HSEQ Report

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		• Identify indigenous species for planting and suitable sources for seed and plants as appropriate (preferably using seed of local origin as far as possible, and only supplement with other seed where locally sourced seed is unavailable). • Temporary fencing or other appropriate barriers should be installed where necessary in the short- to medium-term to prevent entry to the area and potential livestock overgrazing, allowing for vegetation regrowth and soil stabilization.				
Biodiversity (Indirect Disturbance to or Displacement of Fauna)	Section 7.7	• Pre-clearance surveys targeting fauna (including birds, bats, non-volant mammals, and herpetofauna) should be undertaken prior to any vegetation clearance, earthworks or ground disturbance. Surveys must include checks for active nests, burrows, roosts, breeding activity, and presence of any PBF fauna species and/or species of conservation significance. Any individuals found should be gently relocated to nearby suitable habitat to ensure their protection from construction-related impacts, in accordance with a Wildlife Shepherding Protocol. • Vegetation clearance and ground disturbance activities will be planned to avoid sensitive breeding, nesting and roosting periods, whenever feasible. • During the construction phase, movement of vehicles will be prohibited outside of 100 m corridor from the OHL and approved routes will be strictly followed. • Vehicle noise levels will not exceed the level specified under Mongolian standards for noise and vibration. Low-noise emitting motorized equipment (for construction) will be selected. Other mitigation measures related to noise should be followed. • In case working night shifts is needed, work will be planned to comply with night-time noise level limits, and vehicle movement/operation should be restricted during nighttime to limit risk of impact to fauna due to visibility issues. • Construction vehicles and equipment will be registered, permitted and meet emission standard established as per regulation requirements. • Where possible, lighting should not be active during nighttime. Where lighting is required, it should not be directed towards areas likely to contain native fauna. • Use appropriate lighting that minimizes ecological effects on wildlife and limits attraction of insects, e.g. using long wavelength light (warm white, orange, red, and infra-red) and low intensity lights where possible. • Invasive species have the potential to enter or exit the Project Site via transportation of equipment, and materials. In order to avoid/minimize the introduction of invasive fauna species, a suitable Invasive Species Management Plan (ISMP) should be prepared to prevent the introduction of invasive species and to respond accordingly if such introduction occurs. The plan should include (but not be limited to) the following mitigations: • Source goods and materials locally where possible (including topsoil removed as part of construction works); • Prohibit the general access of vehicles, construction workers and machinery and storing of soils to rangelands outside of the construction zone and approved access routes to avoid the dispersion of invasive alien species within these habitats; • Clean boots prior to entering the Project site, and use vehicle pressure-wash down procedures to reduce the transmission of invasive species into and from the Project Site, including washing of vehicle tires and underbody to remove seeds of invasive plants; • Source goods and materials locally where possible; • Use only certified pest-free stock where possible; and • Control any small infestations early and appropriately, to avoid spreading infestation.	EPC Contractor & Biodiversity Specialist(s)	• Site inspections and record keeping to monitor implementation of mitigation measures • Completion and monitoring of Invasive Species Management Plan (ISMP)	• Monthly monitoring of all mitigation measures • Monitoring frequency for invasive species to be defined in ISMP	• Monthly HSEQ
Biodiversity (Direct Impacts from Barrier Creation)	Section 7.7	Implement all mitigations listed above and the following additional measure: • All temporary construction features, such as excavations, fencing, and stockpiles of soil or materials, must be fully removed upon completion of construction to enable natural habitat recovery and reduce long-term barriers to species movement. • Utilize native flora as natural fencing instead of artificial barriers, where possible. •	EPC Contractor & Biodiversity Specialist(s)	• Visual inspection of implementation • Temporary barriers removed after end of construction	• Quarterly	• Monthly/ Quarterly HSEQ Report
Biodiversity (Indirect Degradation of Habitat)	Section 7.7	• Dust management measures are the same as those outlined for the row 'Air (Fugitive Dust Emissions)', particularly that all machinery and handheld equipment must comply with required air emission standards. • Management measures for release of contaminants are the same as those outlined for the following rows: 'Water Resources (Potential Impact on Water Quality)' and 'Soil (Potential Impact to Soil)'.	EPC Contractor	• Monitoring as defined by each respective section.	• Frequency as defined by each respective section.	• Monthly/ Quarterly HSEQ

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		• Leak and spillage mitigation measures for avoiding accidental leaks are the same as those for 'Unplanned Events' (***Table 11-8***).				
Biodiversity (Direct Mortality Impacts from Vehicle Collision, Hunting, and Poaching)	Section 7.7	• All vehicles are to maintain a speed of a maximum of 30 km/hr within construction work areas to reduce the risk of fauna strikes. The speed limit may be revised upon further review with a wildlife expert, as necessary. • All off-road driving and use of any non-approved access roads are strictly prohibited. • Prior to starting construction work, the area will be checked for presence of fauna along tracks and in work areas, to reduce the likelihood of vehicle collision. • Provide training to staff and workers on biodiversity awareness (including on fauna species of conservation significance in the Project area), as well as all rules, regulations and information concerning prohibitions on hunting, poaching, and collection of species, and the punishment that can be expected if any staff or worker or other person associated with the Project violates rules and regulations. • Install wildlife warning signs at regular intervals along all internal roads and access roads.	EPC Contractor	• Site inspections and record keeping to monitor implementation of mitigation measures • Site inspections and record keeping of incidents related to fauna. • Training records (including attendance and content). • Records of non-compliances to Project rules and protocols are to be kept and regularly updated. Corrective actions to non-compliances to be undertaken immediately.	• Monthly monitoring of all mitigation measures • Quarterly training • Daily checks of non-compliance	• Daily Inspection Check List • Ad hoc Incident/ Corrective Actions Report • Monthly/ Quarterly HSEQ Report
Social						
Local economy and livelihood	Section 8.3	**Employment Opportunities** • Implement the Human Resource Management Plan (HRMP) prior to construction, detailing wage structures, hiring procedures, recruitment prioritization for local workers, workforce skill requirements, and opportunities for training and upskilling; • Ensure that all affected communities have equal access to employment opportunities by actively collaborating with local authorities to disseminate recruitment information; ◦ Provide advance notice to local communities regarding job openings before the commencement of construction and operation phases, allowing residents sufficient time to prepare and apply; ◦ Utilize multiple recruitment channels to reach a wider audience, including advertisements on Facebook groups, community bulletin boards, education institutions, and local recruitment offices; ◦ Ensure that the affected baghs and nearby baghs receive equal access to procurement opportunities for small businesses, relying on close cooperation with local authorities for effective outreach and engagement; ◦ Implement a transparent and unbiased recruitment process that is independently verifiable, ensuring it is free from conflicts of interest and fully inclusive of local communities; and ◦ Collect feedback from local stakeholders about the recruitment process to make continuous improvements based on community input. • Proactively communicate the grievance mechanism (GM) to the affected communities and ensure it is easily accessible. Regularly monitor its use to identify common themes and trending issues, using this data to guide improvements in project implementation; • Provide regular updates to local communities regarding the status and resolution of grievances raised; and • Collaborate with local authorities to identify and support community development initiatives focused on enhancing local livelihoods. This could include investments in local infrastructure, education, care service for elderly, orphans and PwDs, and health services that benefit the wider community.	NZE / EPC Contractor	• Feedback from community engagement activities; • Grievance mechanism complaints log; • Labor Management Plan; and • Social & Gender Integration Plan	• Bi-annual community engagement sessions	• Documentation of community feedback and improvement.

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting

		Disturbance to Livelihood
		• Develop a Livelihood Restoration Plan (LRP) aligning with IFC Performance Standard 5 and national regulations prior to any physical or economic displacement. The LRP should:
		  ◦ Conduct comprehensive census and socioeconomic baseline survey of all potentially affected herders to accurately identify household composition, grazing area boundary and patterns, seasonal mobility, livestock numbers, access to critical resources (e.g., wells, minerals), and dependence on the Project area for livelihoods;
		  ◦ Conduct interviews with Bagh Governors, Soum Land Officers, Citizens' Representative Meeting members, experienced herders and other knowledgeable community members to identify households that regularly or periodically utilize pasture resources within the Project area but do not own any of the recorded structures;
		  ◦ Establish cut-off date and communicate to affected communities as part of the LRP census process;
		  ◦ The LRP should confirm that: (i) economic displacement of non-title users, including seasonal pastoralists and customary resource users, is within scope; (ii) eligibility for livelihood restoration does not depend on formal legal title; (iii) negotiated agreements will document informed consent for access restrictions; and (iv) entitlements address loss of grazing access, mobility disruption, and resource competition regardless of ownership status;
		  ◦ Conduct vulnerability screening protocol that assess female-headed households; elderly (>65) or child-dependent households; people with disabilities; households below poverty threshold; high dependence on affected pasture/wells; debt burden; and limited mobility/transport access. Vulnerability status should then inform enhanced assistance eligibility and monitoring priority within the LRP;
		  ◦ Eligibility criteria covering all economically displaced households regardless of title;
		  ◦ Entitlement matrix by impact type and severity;
		  ◦ Compensation valuation methodology;
		  ◦ Livelihood restoration measures for loss of grazing/water access as required by PS5's principle of restoring livelihoods to pre-impact levels or better;
		  ◦ Vulnerable household provisions;
		  ◦ Implementation budget and timeline;
		  ◦ Monitoring indicators and completion criteria; and
		  ◦ Incorporate a consultation and disclosure process ensuring herders understand the nature of temporary access restrictions, grievance mechanisms, entitlement options, and mitigation commitments.
		• Minimisation of the area and during of temporary land occupation (where applicable);
		• Construct the Access Road and internal roads along existing dirt roads or previously disturbed land to reduce the need for new land development and minimize the loss of pastureland (where applicable);
		• Ensure construction activities avoid critical areas such as herder settlements and wells.
		• Optimize the design and layout of project infrastructure (e.g., Substation and OHL) to minimize the area of land permanently occupied by the project;
		• Advance notification of construction activities to affected herders and engage with herding communities throughout the construction process to provide project updates, gather feedback, and address concerns; and
		• Communicate and implement the grievance mechanism to receive and respond to grievances about disturbance of herders' grazing land.
		• Implementation of Traffic Management Measures to accommodate livestock movement; and
		• Reinstatement of temporarily disturbed areas following completion of works.
			NZE / EPC Contractor	• Feedback from community engagement activities;
				• Grievance mechanism complaints log;
				• Livelihood Restoration Plan (LRP).
					• Bi-annual community engagement sessions; and
					• Bi-annual reviews of grievance mechanism
						• Documentation of community feedback and improvement; and
						• Reports on grievance resolution status and updates to communities if any.

Traffic and transportation	Section 8.4	• Utilize existing earth roads as much as possible for constructing the access road and internal roads to minimize the development of new land and reduce impacts on pastureland; and • Communicate and implement the grievance mechanism and a compensation scheme for livestock fatalities caused by Project vehicles. • Implement the existing Traffic Management Plan (TMP) with emphasis on the livestock-specific controls.	NZE / EPC Contractor	• Traffic Management Plan; and • Grievance mechanism complaints log;	• Daily inspection of vehicle usage during construction phase	• Incident reports and investigation records; and • Monthly HSEQ Report
Land use	Section 8.5	• Develop a LRP based on requirements outlined in Section 8.3.4.3; • Establish effective communication mechanism and actively communicate with the local community prior to and during the construction phase, in order to inform on Project construction timeline, transportation route and timeline, activities performed during the construction and operation phase of the Project;	NZE / EPC Contractor	• Feedback from community engagement activities; and • Grievance mechanism complaints log	Bi-annually during construction phase	• Documentation of community feedback and improvement; and

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		• The perimeters of the Project groundwork or active construction site should be fenced and monitored to prevent any trespassing of wildlife, livestock, herders and the Ovoo/Tomb structures within the Project AoI; • Restore all temporarily disturbed areas following completion of construction activities. Restoration measures will include contouring and stabilisation of disturbed surfaces, backfilling and compacting excavated areas, removal of construction debris and waste, and implementation of appropriate erosion-control measures. Rehabilitation activities will be designed to reflect local soil conditions and traditional land-use practices, with the objective of returning affected areas to productive pasture. • Undertake re-vegetation of affected pasture areas using native, drought-resistant grass and plant species typical of Mongolian rangelands. Re-vegetation activities will be implemented in consultation with local herders and relevant soum authorities to ensure compatibility with local grazing practices and ecological conditions. • Communicate and implement the grievance mechanism to receive and respond to grievances about land use; and • Ensure that effective communication channels with local stakeholders, such as Facebook groups and bagh/soum meetings, are put in place to address any issues which might arise during the Project operation phase. It is informed by the Client that no resettlement is expected for this Project. However, if any physical or economic displacement occurs during the Project development, a Resettlement Action Plan (RAP) shall be prepared in accordance with IFC Performance Standard 5 and applicable national regulations;				• Reports on grievance resolution status and updates to communities if any.
Infrastructure/public services	Section 8.6	**Water usage** • Implement water-saving practices during construction, such as recycling water for equipment cleaning or dust suppression; and • Communicate and implement the grievance mechanism to document and address water-related complaints. **Electricity Usage** • Ensure backup power systems are in place to prevent outages caused by construction-related activities; • Collaborate with utility providers to monitor grid stability and address any power disruptions immediately; and • Communicate and implement the grievance mechanism to document and address electricity-related complaints. **Waste Management** • Update the Waste Management Plan and regularly monitor its implementation; • Promote the use of reusable and recyclable materials during construction; • Avoid single-use plastics by providing alternatives such as reusable containers or biodegradable materials; • Set up designated waste segregation points at the construction site for recyclable, hazardous, and general waste; • Establish temporary waste storage areas that are secure, weatherproof, and away from sensitive locations like water sources or residential areas; • Identify opportunities to reuse construction debris (e.g., concrete, wood, and metals) in the project or donate reusable materials to local communities; • Communicate and implement the grievance mechanism to allow local residents to report any issues related to waste mismanagement. **Education and Health Services** • Offer scholarships or job training programs to local students, preparing them for employment opportunities in the wind energy sector; • Provide funding or resources to local schools to enhance their capacity; • Coordinate with local health authorities to develop a response plan for any emergencies that may arise during construction; • Establish first-aid stations at the construction site to reduce the burden on local health facilities; • Track the frequency and type of health issues reported by local residents and workers; and • Designate a community liaison officer to provide regular updates on the project and address concerns.	NZE / EPC Contractor	• Water and energy consumption; • Grievance mechanism complaints log; and • Waste Management Plan	• Quarterly during construction phase	• Grievance Log • Quarterly HSEQ Reports
Occupational health and safety	Section 8.7	**Working at Height** • Use work equipment or other methods to prevent a fall from occurring when working at height; • Ensure all structures are designed and built to the appropriate standards and have the appropriate means of working-at-height systems fitted; • Suitable exclusion zones should be established and maintained underneath any working at height activities, where possible, to protect workers from falling objects;	NZE / EPC Contractor	• Workers Grievance Mechanism Log; and	Monthly during construction phase	Monthly HSEQ Report

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		• Ensure all employees working at height are trained and competent in the use of all working at height and rescue systems in place; • Provide workers with a suitable work-positioning device; also ensure the connectors on positioning systems are compatible with the tower components to which they are attached; • Ensure that hoisting equipment is properly rated and maintained and that hoist operators are properly trained; • When working at height, all tools and equipment should be fitted with a lanyard, where possible, and capture netting should be used if practicable; • Signs and other obstructions should be removed from poles or structures prior to undertaking work; • An approved tool bag should be used for raising or lowering tools or materials to workers on elevated structures; • Avoid conducting tower installation or maintenance work during poor weather conditions and especially where there is a risk of lightning strikes; and • Implement the Implement the Emergency Preparedness and Response Plan (EPRP) should be in place detailing the methods to be used to rescue operatives should they become stranded or incapacitated while at height. **Working at Remote Location** • Suitable communication equipment available for the workers; • The training and competence of personnel working remotely and the readiness of all necessary safety equipment in the location; • Supervision by competent personnel empowered to make decisions based on events and conditions at the work location; • Provide means for managers to track the exact location of the workers; • Provision of suitably qualified first-aid-trained workers; and • Frequent trainings and knowledge sharing regarding to personal hygiene and communicable diseases. **Lifting Operations** • Ensure all relevant information is known about the load, e.g., the size, weight, method of slinging, and attachment points; • Ensure all lifting equipment (including load attachment points) is suitable, capable of supporting the load, in good condition, and in receipt of any statutory inspections required; • Ensure all supervisors, equipment operators, and slingers are trained and competent in the lifting equipment and intended lifting techniques; • Where possible, exclusion zones are to be established and maintained in order to prevent any unauthorized access to lifting areas; • When lifting large loads, ensure weather conditions are favourable for the task; • Safe operating parameters of heavy lifting equipment should not be exceeded at any time; and • A planning meeting between all parties involved in the lift should be carried out and should include: the details of the lift, the roles of each party involved in the lift, and the methods used to communicate instructions among the parties. • **Extreme Temperature Exposure** • Implement heat-stress and cold-stress management measures, including work-rest cycles, mandatory hydration protocols, shaded rest shelters, temperature-triggered task suspension, and real-time monitoring of worker condition by trained supervisors. • **High Wind Conditions & Sudden Weather Changes** • Establish wind-speed thresholds for stopping work at height, crane operations, and blade/tower handling; • Integrate real-time meteorological monitoring and early-warning alerts; • Require immediate evacuation to safe shelters when sudden weather fronts approach. • **Sandstorms and Dust Exposure** • Use weather-forecasting tools and visual monitoring to trigger pre-storm shutdowns; • Provide sealed shelters, goggles, dust-rated PPE (e.g., P2/P3 masks), and ensure workers have clear procedures for halting outdoor activities and maintaining visibility during severe dust events. • **Isolation and Delayed Emergency Response** • Strengthen remote-work protocols including mandatory check-in systems, pre-positioned medical kits/AEDs, and a detailed OHS plan with confirmed evacuation routes and response times. • **Wildlife Encounters**		• Labour Management Plan		

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		• Conduct site-specific wildlife awareness training, enforce avoidance protocols (no feeding, no approach), maintain clean camps to minimize attractants, and establish emergency procedures for venomous/injurious wildlife encounters.				
Community, health, safety and security	Section 8.8	**Workforce Mobilisation and Presence during Construction Phase** • Provide adequate housing worker accommodation and associated amenities, in line with applicable standards and good international industry practice, to minimise pressure on local housing, water supply, sanitation, and other for workers to reduce pressure on local community infrastructure; • Undertake health screening to assess fitness and health to work including compulsory medical examinations for Project workers and contractors to ensure they are fit for working; • Implement vaccination programs and monitor the prevalence of communicable diseases detected through the annual workers' medical check-up; • Establish and implement a project policy on healthy lifestyle and regularly socialize among the workforces. Socialize it as part of inductions and training on the Project's Code of Conduct (CoC) particularly in relation to interaction with the locals; • The CoC shall explicitly prohibit all forms of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH). The CoC shall be communicated to all workers, include a signed acknowledgment by each worker and be supported by clearly defined disciplinary measures for non-compliance. The CoC shall also reference applicable worker and community grievance mechanisms, including confidential channels for reporting GBV/SEA-related concerns; • All workers shall receive regular training on GBV prevention and Code of Conduct to reinforce expected standard of behaviour, promote awareness of prohibited conduct, and ensure understanding of confidential, survivor-centred grievance and reporting mechanisms, including escalation procedures and protection against retaliation; • Communicate, and implement and maintain a project-level the grievance mechanism that is accessible to for all community groups (and workers), enabling the timely reporting of concerns, including health, safety, security, and conduct-related issues. All grievances shall be recorded, investigated, and addressed in a transparent and timely manner, in accordance with established procedures to report concerns, and investigation should be conducted after concerns are reported; • Monitor changes in community health conditions, as reported by soum-level health facilities, to identify any Project-related trends or emerging risks and enable adaptive management where necessary; and • Establish and implement a Community Health, Safety and Security Management Plan that includes promoting a zero tolerance approach to inappropriate worker behaviour, including GBV, SEA/SH, and other forms of misconduct, and defines roles, responsibilities, monitoring arrangements, and corrective actions. towards inappropriate worker behaviours. **Equipment and Material Transportation and Supply During Construction Phase** • Regular monitoring of the implementation of Traffic Management Plan to ensure compliance; and • Conduct community traffic awareness campaign at the Bagh level, informing herders and local residents about transportation schedules, heavy-vehicle movements, and blind-spot risks around large haulers. **Health Impacts from Project Construction Activities** • Use water sprays and dust barriers at construction sites; • Limit diesel machinery and switch to electric equipment where possible; • Changes to the health baseline according to soum hospitals should be monitored. Should any significant increased number of respiratory illnesses be identified caused by this Project, a community health assistance program will be implemented; • Implement the mitigation for air and noise listed in **Section 7.1** and **7.3;** and • Communicate and implement mechanisms for local communities to voice health concerns related to project activities, ensuring a timely response from project management.	NZE / EPC Contractor	• Feedback from community engagement activities; • Grievance mechanism complaints log; and • Health baseline of the local community	Bi-annually during construction phase	• Documentation of community feedback and improvement; and • Reports on grievance resolution status and updates to communities if any.
Cultural heritage	Section 8.9	• Exercise heightened caution during site clearance, excavation, grading, and the drilling of water wells to minimize the risk of disturbing any buried archaeological or cultural artifacts; • Demonstrate respect for local customs, beliefs, and traditions, with particular regard to the worship of ovoos, which are recognised as culturally and spiritually significant features. Where appropriate and in consultation with local authorities or community representatives, participation in ovoo worship or observance of related practices should be undertaken in a respectful and culturally appropriate manner, with the aim of fostering mutual understanding and positive relationships with the local community;	NZE / EPC Contractor	• Chance Find Procedure; and • Grievance mechanism complaints log	Daily inspection during construction phase	Monthly HSEQ Report

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		• In the event that any historical or cultural relics or artifacts are uncovered, immediately halt all activities in the affected area and notify a qualified professional organization, such as an archaeological or cultural heritage authority, for proper assessment and guidance; • Implement a Chance Find Procedure is recommended to manage any previously unidentified features of archaeological, historical or culturally significance features encountered within that may be found on within the Project Site during construction. The procedure shall be consistent with IFC Performance Standard 8 and include, at a minimum: ◦ Clear procedure for documentation, record keeping and expert verification of chance finds by qualified cultural heritage specialists or relevant authorities procedures; ◦ Defined chain of custody protocols instructions for movable cultural heritage items to ensure their protection, secure handling, and appropriate transfer to the competent authority; ◦ Explicit Clear criteria and decision making process for for potential temporary suspension of construction activities, where necessary, to allow for timely assessment, protection, and resolution of issues related to the find, in coordination with the relevant cultural heritage authorities work stoppages that could be required for rapid disposition of issues related to the finds; ◦ Establish a 500 m buffer zone should be established around identified archaeological sites by, with the buffer extent determined based on the significance and sensitivity of each site, as advised by consulting the local cultural heritage authority or qualified cultural heritage specialist. No construction or ground-disturbing activities should be undertaken within the buffer zone unless agreed in advance with the relevant authorities; ◦ Carry out engagement during the development phase with a specialist when detailed construction sites locations are available; and ◦ Record complaints under the grievance mechanism process and follow up by identifying the causes and taking appropriate measures when receiving the complaint to mitigate the disturbance. •				

11.8.2 OPERATION PHASE – ADDITIONAL MITIGATION MEASURES

TABLE 11-7: SUMMARY OF ADDITIONAL MITIGATION MEASURES (OPERATION PHASE)

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
Environment (Noise, Water Resources and Biodiversity)						
Noise	Section 7.4	**Wind Turbine Noise** • Routine maintenance of wind turbines to be conducted, with specific attention to equipment degradation that may cause further noise impacts. Any equipment that is abnormally noisy should be evaluated and repaired as necessary to return emissions to typical operating performance; and • A Sound Performance Warranty will be drawn up with the manufacturer of the turbines for this Project to ensure that the noise output will not contain any significant audible tones.	NZE	• Visual inspection and record keeping; and • Operation logs.	• Monthly during operation phase	• Bi-annual Health, Safety, Environment, and Quality (HSEQ) Report
Water Resources (Potential Impact due to Water Resources Competition)	Section 7.6	• None recommended		•	•	•
Water Resources (Potential Impact on Water Quality)	Section 7.6	• Maintain sewage system in good condition; • Regular mechanical inspections should be routinely carried out to prevent fuel, oil and other liquids spills from vehicles and equipment used in operation phase; and • Materials that may pollute groundwater shall be stored on impermeable materials to prevent flowing of materials through storm water drainage and rainwater; oil trap techniques should be utilized as appropriate.	NZE	• Visual inspection and record keeping	• Monthly during operation phase	• Monthly Health, Safety, Environment, and Quality (HSEQ) Report
Biodiversity (Direct Mortality of Volant Fauna – Collision with Wind Turbines)	Section 7.7	• All tower structures are to be free of holes that can be used for nesting. Roosting habitats (wires and ledges) are to be kept to a minimum. • Limit the operation of turbines when winds are not sufficient; eliminate “free-wheeling” (free spinning of rotors under low wind conditions when turbines are not generating power). • Food waste shall be appropriately managed to avoid attracting birds, especially raptors to such food sources. • Implement a Post-Construction Fatality Monitoring (PCFM) programme for long-term monitoring of bird and bat injury and mortality, according to best international practices. Collision injuries/mortalities of volant species should be reported on a quarterly basis to identify high-risk species and to inform adaptive management measures. • Maintain a carcass register to record any bird and bat carcasses and suspected carcasses. The register should include the date, type of species (to the extent identifiable), geographic location, and the nearest wind turbine for each carcass entry. If possible, the register should include photo-documentation of any identified carcasses or remains. • Prepare an adaptive management plan for Post-Construction Fatality Monitoring (PCFM), to be informed by long-term PCFM and carcass register. This plan should be implemented when mortality rates/number of carcasses exceeds a given threshold (to be defined in BMP) and should outline additional mitigations necessary for specific turbines or clusters of turbines. An ecologist or biodiversity specialist will need to be appointed to develop the adaptive management plan based on best international practices. Potential additional mitigations to be explored may include: ◦ Feathering” of turbine blades by rotating the blades parallel to the wind, which prevents blade rotation when they are not operational (below cut-in speeds) or during emergencies, while minimising loss in power generation. Wind turbines to be installed for the Project are confirmed to be capable of blade feathering, therefore on-demand curtailment / shut-down can be implemented if mortality rates exceed thresholds defined in the adaptive management plan. ◦ Auditory deterrents and/or painting of alternate turbine blades to increase visibility for birds.	Project Proponent, O&M Contractor & Biodiversity Specialist(s)	• Visual inspection and record keeping of turbine operation and waste management. • Visual inspection for PCFM and carcass register at the base of all wind turbines	• Weekly inspection • Quarterly reporting	• Monthly/ Quarterly HSEQ Report
Biodiversity (Direct Mortality of Volant		• Installation of bird flight diverters (BFDs), particularly at the locations of VP8 and VP9 where high numbers of Cinereous Vultures have been recorded, minimising the vertical spread of power lines and having lines in a horizontal plane to reduce collision risk. Install BFDs along earth wires of the OHL with spacing according to international best practices (e.g. APLIC, 2012). Based on best	Project Proponent, O&M Contractor &	• Inspection of installed devices and ad hoc	• Monthly inspection of installed devices	• Monthly/ Quarterly HSEQ Report

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
Fauna – Collision and Electrocution)		available practice for the South-East Gobi region, only spiral type BFDs are recommended as they are known to be more effective in the harsh climate of the Project area, while flapper type devices are not recommended due to their high malfunction rate when deployed in this region. • Monthly inspection and maintenance of polymer-coated insulators and BFDs installed on OHL and replacement of defective devices to be carried out throughout the operational life of the Project (20-25 years). • Ensure power towers and transmission lines meet safety standards (i.e., APLIC) and designed such that electrocution risk is avoided in line with guidance. • Implement a Post-Construction Fatality Monitoring (PCFM) programme for long-term monitoring of bird and bat injury and mortality from collision and electrocution with OHL, according to best international practices. Collision injuries/mortalities of volant species should be reported on a quarterly basis to identify high-risk species and to inform adaptive management measures. • Maintain a carcass register to record any bird and bat carcasses and suspected carcasses. The register should include the date, type of species (to the extent identifiable), geographic location, and the nearest OHL infrastructure for each carcass entry. If possible, the register should include photo-documentation of any identified carcasses or remains. • Prepare an adaptive management plan to be informed by long-term PCFM and carcass register. This plan should be implemented when mortality rates/number of carcasses exceeds a given threshold (to be defined in BMP) and should outline additional mitigations necessary. An ecologist or biodiversity specialist will need to be appointed to develop the adaptive management plan based on best international practices.	Biodiversity Specialist(s)	replacement of defects. • Visual inspection for PCFM and carcass register along OHL route	• Weekly monitoring for PCFM and carcasses	
Biodiversity (Direct Displacement from Barriers)		• Specific monitoring and adaptation measures to mitigate barrier creation effects on migratory large mammals (such as Asiatic Wild Ass, Mongolian Gazelle and Goitered Gazelle), will be recommended in the BMP.		• Details of fauna monitoring surveys during operation to be detailed in BMP.	• Subject to BMP	• Monthly/ Quarterly HSEQ Report
Climate Change (refer to *Table 11-6*)						
Social						
Shadow Flicker	Section 8.10	• Implement and communicate the grievance mechanism for the local community to submit their complaints regarding nuisances related to shadow flickers from WTGs. • Ensure the close monitoring through engagement with local stakeholders by informing affected communities during the operation phase where predicted impacts from shadow flickers are present.	NZE	Grievance mechanism complaints log	Bi-annually during operation phase	Bi-annual Health, Safety, Environment, and Quality (HSEQ) Report

TABLE 11-8: SUMMARY OF ADDITIONAL MITIGATION MEASURES FOR UNPLANNED EVENTS

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
Leakage and Spill Incident	Section 9.3.1	• Ensure regular inspection and maintenance of vehicles and equipment to be used in the Project's construction according to the schedule; check for cracks and fissures in the concrete platforms used by the vehicles; maintain and repair any damage and clean up flammable materials spilled at the site accordingly; • Heavy machinery/vehicles and equipment should be properly maintained, and any flammable materials spilled on dry pebbles should be properly cleaned/removed to prevent contamination. Training should be provided to drivers and operators for oil and spill response and how to use spill kit; • Materials that may pollute groundwater shall be stored on impermeable materials, to prevent flowing of materials through storm water drainage and rainwater; oil trap techniques should be utilized as appropriate; • Flammable lubricant materials storage tank pipes and valves should be regularly checked for wear and tear and be replaced, if necessary;	NZE	• Visual inspection; • Master List of Means and Equipment for Emergency Responses; • Emergency Equipment Monthly Inspection Tag; and • Emergency Response Plan	• Daily inspection during construction phase and monthly inspection during operation phase.	• Monthly Health, Safety, Environment, and Quality (HSEQ) Report; and • Emergency Drill Report.

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		• In the event of a spillage or leakage from the storage tanks, proper pumps for collecting and special absorbent materials should be adequately placed at the location. Trays and blind pits, if any, should be regularly inspected and cleaned to remove any accumulated residues; • Ensure controls are in place to prevent leaving the vehicle unattended while refuelling and regularly check that the valve of the tank containing flammable lubricant materials is closed tight; and • Contaminated soil will be dug and disposed as hazardous waste. • Chemicals will be handled and stored in compliance with the Material Safety Data Sheet (MSDS); • All chemical wastes will be segregated into clearly marked containers prior to disposal site by a licensed waste management contractor, as per the relevant MSDSs; • Monthly monitoring the implementation of all proposed mitigation measures specified in EPRP should be conducted properly; • Daily inspection of any secondary containment of oil/chemical on site and ensure good maintenance procedures to minimize small leaks and spills; • Spill drills will be made as described in the EPRP; and. • Response in the event of a spill will be implemented as described in the EPRP and DERP.				
Fire and Explosion	Section 9.3.2	• Place fire protection equipment, primary tools and fire extinguishers in appropriate places; • Ensure that workers and staff are trained on a regular basis for cases of fire prevention, rescue, and firefighting operations. Provide training to the workers and staff for knowledge and skills, ensure practice and readiness for cases of fire on a regular basis; • Pre-communicate and coordinate with local firefighting brigade/station; • Restrict smoking to controlled areas only; • Implement all required safety and management requirements relating to the transportation, storage and handling of explosives; • Fuel tanks and chemical storage areas should be provided with locks and be sited on sealed areas. Establishment of secondary containment for fuel storage and hazardous materials, which have pollution prevention facilities; • Conduct fire and evacuation drills; • A monthly audit program shall be established to check the implementation of emergency response and evacuation plan, staff training, equipment inspection, and firefighting drills; • Procedures for fire prevention will be implemented as described in the Fire Prevention Plan (FPP); • For the 350KV BESS, use a certified BESS complying with IEC 62619, UL 1973, UL 9540 or equivalent; equipped with integrated Battery Management System (BMS) allowing automatic shutdown upon detection of abnormal conditions; and with nearby portable electrical fire extinguishers or built in clean-agent suppression system;and • Response in the event of a BESS thermal runaway / fire incident will be implemented as described in the EPRP and DERP.	NZE / EPC Contractor	• Visual inspection; • Master List of Means and Equipment for Emergency Responses; • Emergency Equipment Monthly Inspection Tag; and • Emergency Response Plan	• Daily inspection during construction phase and monthly inspection during operation phase.	• Monthly Health, Safety, Environment, and Quality (HSEQ) Report; and • Emergency Drill Report.
Blade Throw	Section 9.3.3	• Minimize the probability of a blade failure by selecting wind turbines that have been subject to independent design verification/certification (e.g., IEC 61400-1), and surveillance of manufacturing quality; • Ensure that lightning protection systems are properly installed and maintained; • A quarterly audit program (part of O&M contract with the WTG manufacturer) shall be established to check the implementation of regular technical inspection of the WTGs and blades' safety. Any identified gaps or opportunities will be followed up after the inspection until resolved. The auditing records will be kept on-site for future review and supervision; • Implement periodic routine inspection and maintenance procedures (in line with international best practices); • Equip the WTGs with vibration sensors that can react to any imbalance in the rotor blades and shut down the turbine if necessary; Equip the WTGs with vibration sensors that can react to any imbalance in the rotor blades and shut down the turbine if necessary; • Monitor Project site conditions against meteorological icing thresholds; • Develop protocol under EPRP to promptly issue alert to community in case of icing and requirement for no-go zone if alert in effect; • Inform herders for awareness of ice throw/blade throw risk during stakeholder engagement including icing alert; • Install warning signage around the 302 m buffer zone where the WTGs are located; • Include ice throw hazard (e.g. Visual inspection and stand-off distance) in WTG maintenance protocol in the EPRP for worker safety; • Implement safe controlled restart after icing in event of shut down (e.g. delay until ice shedding has occurred); and	NZE / EPC Contractor	• Visual inspection; • Emergency Response Plan	• Weekly inspection during operation phase.	• Monthly Health, Safety, Environment, and Quality (HSEQ) Report; and • Emergency Drill Report.

Aspect	ESIA Reference	Mitigation Measure	Responsibility	Monitoring Parameter/Source	Monitoring Frequency	Reporting
		• In the event of a blade throw incident, response will be made as described in the EPRP. Install warning signage around the 302 m buffer zone where the WTGs located				
Equipment Failure	Section 9.3.4	• Refer to Fire And Explosion (Section 9.3.2) and Blade Throw (Section 9.3.3) aspects. • Response in the event of general equipment failure will be made as described in the EPRP.	NZE / EPC Contractor	n/a	n/a	n/a
Transmission Line Snapping and Transmission Pylon Collapse	Section 9.3.5	• Do not install the Substation, OHL and/or other high voltage equipment near households or settlement areas. Overhead transmission lines should be prohibited to be pulled above buildings of residential areas. Comply and operate with the requirements within electrical facility zone • Perform assembly of electric transmission lines controlling quality of the work, use of up to standard materials; inspect and monitor integrity on a regular basis as per schedule. • Provide instructions and procedures about safety precautions to local communities; • Install warning system, signal boards, lighting prevention system, anti-climbing devices on the tower; • A yearly audit program shall be established to check the implementation of regular technical inspection of the transmission lines and transmission pylons' safety; and. • Response in the event of transmission line snapping and pylon collapse will be made as described in the EPRP and DERP.	NZE / EPC Contractor	• Visual inspection; • Master List of Means and Equipment for Emergency Responses; • Emergency Equipment Monthly Inspection Tag; and • Emergency Response Plan	• Daily inspection reporting if non-conformance is to be noted.	• Monthly Health, Safety, Environment, and Quality (HSEQ) Report; and • Emergency Drill Report.
Vehicle Collision	Section 9.3.6	• Drivers should be fully trained for safe operations, vehicles should be inspected in accordance with the state regulations, maintenance should be performed on a regular basis with high standards, and vehicles should be inspected daily with a checklist before operated and meet all the requirements; • In case of a vehicle accident, conduct root-cause analysis and avoid reoccurrences; • Provide all traffic signs and safety infrastructures on the roads; • Avoid bumps, loose rocks, steep slopes and blind bends on the Access Road and internal roads; • Implement a policy prohibiting off-road travelling of vehicles during the construction phase, install road marks and enforce speed limits for travelling vehicles. For example, the 20 km internal roads to be used in the construction of WTGs and OHL should not create new pathways; • Water spraying of road surfaces; • When planning the route for travel during the construction phase, the surrounding landscape which the OHL passes through should be properly marked with speed limits and traffic signs; • Road condition should be regularly inspected for any damaged road section; vehicles should be navigated to travel around the damaged road section; required road maintenance works should be carried out (if necessary); • Provide local community with an understanding of the number and types of vehicles to be used during the construction of the Project and the internal traffic rules and routes prior to start of the construction; • Communicate with the local community prior to construction phase, in order to inform on Project construction timeline, activities performed during the construction and operation phase of the Project; and • Adopt and implement health and safety controls, prevention procedures. • Implement Health and Safety Procedures and good safety practices for the transportation (e.g., alcohol policy, good driving practice, speed limit at 40 km/h); • Use only licensed and experienced drivers and transport companies; • Implement "No Night Driving Policy" (10pm-7am; and 10pm-10am for public holidays) for construction vehicles (during construction phase), when possible; • All vehicles shall use designated roads only, and avoid traveling off roads; • Monthly road condition monitoring along the transportation route to understand road quality during construction phase; and. • Response in the event of vehicle collision will be made as described in the EPRP.	NZE / EPC Contractor	• Visual inspection; • Master List of Means and Equipment for Emergency Responses; • Emergency Equipment Monthly Inspection Tag; and • Emergency Response Plan	• Daily inspection reporting if non-conformance is to be noted.	• Monthly Health, Safety, Environment, and Quality (HSEQ) Report; and • Emergency Drill Report.

11.9 TRAINING

11.9.1 OVERVIEW

To ensure that all personnel involved in the Project are adequately prepared and can perform their responsibilities competently, training will be mandatory. All employees, contractors, and visitors to the Project site must receive appropriate training as defined by NZE's ESMS.

11.9.2 SITE INDUCTION TRAINING

11.9.2.1 GENERAL INDUCTIONS

All personnel engaged in the Project must complete a site induction prior to beginning work. This induction will cover critical health, safety, and environmental issues relevant to their roles. Induction training is designed to provide an understanding of:

- Environmental and social risks associated with solar project activities;
- Compliance with local and international environmental and social regulations; and
- Key environmental and social commitments alongside mitigation measures relevant to the project.

Induction training will encompass:

- Overview of the company's health, safety, and environmental policies;
- Layout orientation of the project site;
- Definition of individual roles and responsibilities concerning health, safety, and the environment;
- Summation of the ESMS requirements and environmental issues;
- Overview of working conditions and protocols (overtime, transportation, and workplace cleanliness);
- Mandatory use of personal protective equipment (PPE);
- Emergency procedures and evacuation protocols; and
- Participation requirements in health, safety, and environmental contractual procedures.

11.9.2.2 VISITOR INDUCTION

Visitors must arrange their site visits in advance and complete a visitor induction upon arrival. A fully inducted company representative will accompany visitors throughout their time on site.

11.9.3 SPECIALIST ENVIRONMENTAL TRAINING

Specialized training modules will be developed for specific groups within the workforce based on their roles. This includes additional training focused on environmental management for personnel involved directly with construction and operational activities. Selected individuals will receive targeted training on emergency response, such as spill management and first aid.

The Project will maintain a training needs matrix, which will facilitate the identification of specific training requirements according to job roles. Specialist training may involve both in-house personnel and approved external training providers.

11.9.4 TOOLBOX MEETINGS

Toolbox meetings will be held regularly, at least on a monthly basis, to discuss relevant topics surrounding health, safety, and environmental practices. The discussions will focus on current work practices and will address any incidents or lessons learned.

These meetings will serve as a platform for communicating vital changes and updates regarding safety or environmental practices. Daily pre-start discussions will also address:

- The day's work activities and anticipated hazards;
- Weather conditions that may impact environment controls;
- Visitors scheduled for the day; and
- Identifying health, safety, and environmental risks specific to the work being conducted.

11.9.5 TRAINING RECORDS

All training sessions, including details about attendees, materials used, and evaluations, will be documented and maintained by the Project Management team. Attendance sheets will be circulated and signed at each training session, including toolbox meetings.

Records are to be centralized and available for review during audits, ensuring ongoing compliance and evaluation of training effectiveness throughout the project lifecycle. Contractors are required to maintain their records and provide them as requested.

11.10 ENVIRONMENTAL MONITORING PLAN

Environmental monitoring will be conducted to ensure compliance with applicable regulatory requirements, as well as to evaluate the effectiveness of operational controls and other measures intended to mitigate potential environmental impacts.

NZE is responsible for identifying and reporting any breaches of obligations or performance failures related to the Environmental Permit and the Environmental and Social Management Plan (ESMP) as soon as reasonably practicable.

Table 11-9 provides an overview of the monitoring program for the Project during the construction phase. ***Table 11-10*** outlines the recommended monitoring program for the operational phase of the Project. NZE will monitor implementation of these monitoring plans throughout the Project lifecycle to ensure compliance and effective management of environmental impacts, in collaboration with contractors, third parties and local authorities as needed. All monitoring plans should be appropriately documented and subject to review and approval prior to implementation.

TABLE 11-9: PROPOSED MONITORING PROGRAMME FOR THE PROJECT (CONSTRUCTION PHASE)

Aspect	Number of Monitoring Locations	Monitoring Locations	Monitoring Methodology	Monitoring Parameters	Monitoring Frequency	Monitoring Standards for Comparison	Responsibility
Biodiversity							
Direct Loss of Terrestrial Habitat	N/A	Entire construction footprint (including temporary and permanent areas), Project AoI, and sites of habitat rehabilitation, revegetation, and plant transplantation.	• Completion of all pre-construction flora and fauna surveys prior to start of construction works. • Regular (weekly) checks and progress reporting for Priority Plant Conservation Plan (PPCP) and micro-siting activities. • Completion of species-specific translocation prior to vegetation clearance. • All construction works areas are demarcated and flora exclusion buffers established.	• Records of number of surveys completed. • Records of plants retained-onsite, plants transplanted, and species planted for habitat rehabilitation. • Percentage of works areas and flora exclusion buffers demarcated prior to construction	• Before construction	• N/A	• NZE/ EPC Contractor / Biodiversity Specialist(s)
Direct Loss of Terrestrial Habitat	N/A	Entire construction footprint (including temporary and permanent areas), Project AoI, and sites of habitat rehabilitation, revegetation, and plant transplantation.	• Regular (weekly) checks during construction are to occur along all construction site boundaries to ensure compliance with clearing within marked boundaries. • Records of non-compliance and corrective actions are to be kept and regularly reviewed (quarterly) for implementation of all specified mitigations and the workforce training program for fauna/flora awareness. • Quarterly monitoring of Priority Plant Conservation Plan, including regular inspections of survival rate of all species retained on-site by competent ecologists. Implement corrective actions as necessary. • Quarterly monitoring of Plant Rescue and Translocation Protocol (PRTP), including regular inspections of survival rate of all relocated species by competent ecologists to determine plant establishment. Implement corrective actions if survival rates fall below a minimum threshold (to be defined in PRTP). • Quarterly monitoring of Habitat Rehabilitation Plan, including regular inspections by competent ecologists of rehabilitation success/failure and survival rate of planted species. Implement corrective actions if survival rates fall below a minimum threshold (to be defined in HRP).	• Records of non-compliances • Records of training sessions (number of attendees and content). • Implementation progress of PPCP, PRTP, and HRP. • Records of species planted for habitat rehabilitation. • Plant establishment and survival rate of retained/ rehabilitated/ revegetated areas and transplanted individuals.	• During construction	• N/A	• NZE/ EPC Contractor / Biodiversity Specialist(s)

Aspect	Number of Monitoring Locations	Monitoring Locations	Monitoring Methodology	Monitoring Parameters	Monitoring Frequency	Monitoring Standards for Comparison	Responsibility
Direct Loss of Terrestrial Habitat	N/A	Project AoI	• 100% of temporary works areas and facilities have been decommissioned and removed following end of construction. • Post-construction habitat reinstatement completed to a suitable standard (e.g. surfaces stabilized with no evidence of erosion).	• Extent (area) of temporary works removed • Soil/slope stabilization and percentage vegetation cover	• Once, after completion of construction • Once, within 2 months of completion of construction	• N/A	• NZE/EPC Contractor
Direct Loss of Terrestrial Habitat	N/A	Project AoI	• 100% native plant species used for habitat restoration • Success of habitat restoration sites	• Percentage of native plant species compared to exotic/introduced species in restored areas • Species survival and colonization rates (%) and habitat quality/condition post-restoration compared to baseline	• After completion of construction, semi-annually for 3 years	• Compared to baseline and compared quarter-on-quarter and year-on-year	• NZE/EPC Contractor/ Biodiversity Specialists
Indirect Disturbance to or Displacement of Fauna	N/A	Project AoI	• Monthly monitoring of implementation of mitigation measures in ***Table 11-6***. • Quarterly faunal monitoring surveys. • Invasive species monitoring.	• Fauna species' abundance, diversity, and distribution in the Project AoI. • Presence and extent of invasive species.	• During construction	• Compared to baseline and compared quarter-on-quarter and year-on-year	• NZE/EPC Contractor
Direct Impacts from Barrier Creation	N/A	Entire construction footprint (including temporary and permanent areas) where barriers are present, and control sites.	• Quarterly faunal monitoring surveys and visual assessment of open areas	• Fauna species' abundance and distribution in the Project AoI. • Documentation of extent of barrier creation effect.	• Quarterly during construction	• Compared to baseline and control sites, and compared quarter-on-quarter and year-on-year	• NZE/EPC Contractor
Indirect Degradation of Habitat	N/A	Project AoI	• Quarterly monitoring of flora species and vegetation cover, and fauna. • Invasive species monitoring.	• Flora and fauna species' abundance, diversity, and distribution in the Project AoI. • Presence and extent of invasive species.	• Quarterly during construction	• Compared quarter-on-quarter and year-on-year	• NZE/EPC Contractor
Direct Mortality Impacts from Vehicle Collision, Hunting and Poaching	N/A	Entire construction footprint (including temporary and permanent areas)	Visual inspection and reporting of fauna-related hunting, poaching, and collision incidents and accidents.	• Fauna incidence register, including date, species number of individuals, nature of event, and nature of injuries/fatalities.	• Document immediately upon reported incidents. • Compile reports and update register monthly.	• Compared quarter-on-quarter and year-on-year	• EPC Contractor
Social							
Local Economy and Livelihood	N/A	N/A	• Employment statistics and HR records • Grievance Log • Training records, including list of participants	• Number of employment opportunities • Number of workers coming from affected communities (four baghs) versus workers from elsewhere for unskilled and skilled positions • Number of grievances logged related to recruitment • Number of people employed by skill-level and gender	• Bi-annually during construction phase	• Labour Management Plan	• NZE/EPC Contractor Human Resource Department

Aspect	Number of Monitoring Locations	Monitoring Locations	Monitoring Methodology	Monitoring Parameters	Monitoring Frequency	Monitoring Standards for Comparison	Responsibility
Traffic and Transportation	Two monitoring locations along the main construction site	Project Site adjacent road	• Incident reports and investigation records • Implementation of Traffic Management Plan • HSEQ Report	• Number of Project related traffic accidents and animal/human fatalities • Frequency of using unpaved road	• Daily inspection of vehicle usage during construction phase	• Traffic Management Plan	• NZE/EPC Contractor
Infrastructure/public services	N/A	N/A	• Grievance Log • Implementation of the Waste Management Plan • HSEQ Reports	• Water and electricity usage of the Project • Generation of solid and hazardous waste • Scholarship and job training programs offered to the affected community • Project-related health problems reported	• Quarterly during construction phase	• N/A	• NZE/EPC Contractor
Community Health, Safety and Security	N/A	Communities in the vicinity of the Project Site (four baghs)	• Grievance Log • HSEQ Reports	• Number of community health and safety-related grievances • Number of reported cases of GBV related to the Project • Incidents and accidents recorded, targeting to have no cases of communicable diseases recorded in relation to the Project	• Bi-annually during construction phase	• N/A	• NZE/EPC Contractor Community Liaison Officer
Occupational Health and Safety	N/A	Project Site	• HSEQ Report • Injury logbooks • Incident reporting records • Equipment maintenance log	• Occupational Disease Case • Number of PPEs provided • Percentage of workers wearing appropriate PPEs • Number of workers received OHS training • Condition of equipment, machinery, and vehicles	• Monthly during construction phase	• DEIA • Labour Management Plan	• NZE / EPC Contractor
Cultural Heritage	N/A	WTG area and OHL RoW	• Chance Find Record • Grievance Log	• Number of historical and cultural relics identified underground	• Daily inspection during construction phase	• N/A	• EPC Contractor

TABLE 11-10:PROPOSED MONITORING PROGRAMME FOR THE PROJECT (OPERATION PHASE)

Aspect	**Number of Monitoring Locations**	**Monitoring Locations**	**Monitoring Methodology**	**Monitoring Parameters**	**Monitoring Frequency**	**Monitoring Standards for Comparison**	**Responsibility**
Noise							
Wind Turbine Noise	N/A	Nearest NSR	• Monitors should be located approximately 1.5 m above the ground and no closer than 3 m to any reflecting surface (e.g., wall). • Noise monitoring should be carried out using a Type 1 or 2 sound level meter and wind shields meeting all appropriate IFC standards.	• Noise level (LAeq, 1 hour) due to operation of equipment and machines during construction.	• Annually during operation	• MNS 4585:2016 • IFC General EHS Guidelines: Environmental Noise Management	• NZE

Aspect	Number of Monitoring Locations	Monitoring Locations	Monitoring Methodology	Monitoring Parameters	Monitoring Frequency	Monitoring Standards for Comparison	Responsibility

			• Wind speed and rainfall should be monitored at sound level meter microphone height with data affected by rainfall and wind speeds above 5 m/s discarded
			• Monitoring duration shall be a minimum of 48 hours with 15 minute intervals
			• The noise data should be correlated with hub-height wind speeds obtained from a meteorological mast or the SCADA system of the wind turbines
			• Periods:
			  ○ Daytime: 06:00 - 22:00 hrs; and
			  ○ Night-time: 22-00 - 06:00 hrs next day.				

Biodiversity							
Direct Mortality of Volant Fauna – Collision with Wind Turbines	N/A	WTG area	• Monitoring of bird and bat collisions with WTGs and OHL, and long-term bird monitoring surveys (should be conducted during peak migration periods and breeding seasons), to be defined in BBAMP and PCFM. • Appropriate adaptive management to be implemented as required and informed by operational monitoring.	• PCFM surveys (bird species' abundance, diversity and distribution throughout the Project's AoI) • PCFM collisions/incidents register (documentation of carcasses including species, number of individuals, dates, locations/wind turbines at which carcasses were found, state of carcasses, and photos). • Number of adaptive management measures implemented, to be recorded in adaptive management actions register	• Throughout operation	• Compared quarter-on-quarter and year-on-year (subject to change based on BMP).	• NZE & Biodiversity Specialists • O&M Contractor
Direct Mortality of Volant Fauna – Collision and Electrocution from OHL	N/A	OHL route	• Monitoring of bird and bat collisions with WTGs and OHL, and long-term bird monitoring surveys (should be conducted during peak migration periods and breeding seasons), to be defined in BBAMP and PCFM. • Appropriate adaptive management to be implemented as required and informed by operational monitoring.	• PCFM surveys (bird species' abundance, diversity and distribution throughout the Project's AoI) • PCFM collisions/incidents register (documentation of carcasses including species, number of individuals, dates, locations at which carcasses were found, state of carcasses, and photos). • Number of adaptive management measures implemented, to be recorded in adaptive management actions register	• Throughout operation	• Compared quarter-on-quarter and year-on-year (subject to change based on BMP).	• NZE & Biodiversity Specialists • O&M Contractor
Social							

Aspect	Number of Monitoring Locations	Monitoring Locations	Monitoring Methodology	Monitoring Parameters	Monitoring Frequency	Monitoring Standards for Comparison	Responsibility
Shadow Flicker	29	10 times the rotor diameter from each WTG centroid (i.e., 1820 m)	• Grievance log	• Number of complaints received from the community regarding the nuisances related to shadow flicker.	• Bi-annually during operation phase	• IFC EHS Guidelines for Wind Energy	• NZE

11.11 ENVIRONMENTAL REPORTING AND RECORDS

The Project undertakes to fulfil the commitments of the ESMP, preparing relevant documentation to fulfil its accountability regarding environmental efforts in the Project activities, such as environmental policies, objectives, programs and their outcomes, organizational structures and systems for the environmental activities in accordance with relevant laws, regulations, commitments, and report the results.

11.11.1 REGULATORY REPORTING

It is noted that NZE requires to conduct periodic Environmental Audits and prepare Annual Environmental Reports. NZE shall facilitate monitoring by relevant authorities and maintain relevant monitoring/audit documentation so it can be provided to relevant authorities if required.

11.11.2 HSSE REPORTING

The NZE E&S Team will submit an internal environmental and social reporting on a monthly basis to the senior management of the Project. The reporting will provide summary of key environmental and social issues/matters for the month, implementation of ESMP actions and summary of all environmental and social related audits (and other reporting as per the contract/agreements). Progress on corrective actions will also be reported.

The HSSE Monitoring Report will include the following information:

- Summary of Key Environmental and Social Issues: An overview of significant environmental and social challenges faced during the month, including community feedback or grievances received;
- Implementation of ESMP Actions: A detailed account of the actions taken to implement the ESMP during the reporting period, including progress updates on specific mitigation measures;
- Summary of Environmental and Social Audits: Findings and outcomes of any environmental and social audits conducted during the month, including any identified non-compliances and recommendations for improvement;
- Progress on Corrective Actions: An update on the status of corrective actions for any findings from previous audits or reported issues, including timelines for resolution;
- Training and Awareness Activities: Information on HSSE training sessions conducted for workers and community members, including participation levels and topics covered;
- Incident Reporting: Details of any health, safety or environmental incidents that occurred, including actions taken in response to these incidents.

11.11.3 RECORD KEEPING

These following documentations are important to implement the ESMP of the Project. They will be available on site and kept up to date by the Construction Manager:

- ESMP;
- Complaint, Incident Report, and Follow up procedure;
- Site inspection forms;
- Safety check forms;

- Results of any site environmental monitoring;
- ERP (including procedure);
- Environmental audit reports and non-conformance notices; and
- Training records.

11.12 FRAMEWORK DECOMMISSIONING ENVIRONMENTAL MANAGEMENT PLAN

At the end of the operational lifespan of the Project, decommissioning will need to be conducted under the prevailing laws and regulations of Mongolia available at the time of the decommissioning activities, including a detailed impact assessment, and Decommissioning Environmental Management Plan (repowering option, dismantling option) that should be planned to be developed in advance of decommissioning activities. Repowering option will also be considered internally. A Decommissioning Environmental Management Plan will be developed to:

- Comply with any requirements of approval conditions, stipulated by the regulator
- Clearly define environmental issues, risks associated with decommissioning and compliance requirements.
- Provide practical and effective management measures for implementation.

The approach and extent of decommissioning and any associated works will be defined in detail in the planning stage of the decommissioning.

In the event of dismantling decommissioning option is planned, the decommissioning approach for infrastructure components is expected to include the approach outlined in ***Table 11-11***.

TABLE 11-11:DECOMMISSIONING APPROACH

Component		Decommissioning Approach
Wind Turbine Generators	WTGs	Disconnected, locked and de-energised, drained of all liquids (oils, lubricants, coolants) and all components disassembled and transported off-site for disposal at licensed waste facility.
	Foundations	Left in situ, rehabilitated (covered in clean fill and profiled)
	WTG Blades	Resold for further use or recycle where possible or disposed at licensed waste facility (as last resort)
Hardstand Areas		Hardstand areas may be retained at the request of stakeholders Any road base materials to be removed and recycled where possible or disposed at licensed waste facility as last resort Ancillary structures (e.g. drainage) to be removed Rehabilitated (covered in clean fill and profiled) and revegetate as required
Access Roads	Retained Access Roads	Access roads may be retained at the request of stakeholders
	Removed Access Roads	Any road base materials to be removed and recycled where possible or disposed at licensed waste facility as last resort Rehabilitated (covered in clean fill and profiled) and revegetate as required
Substation /BESS		Retention of substation area to be at the discretion of the network operator.

Component	Decommissioning Approach
	Electrical components are to be drained of all liquids prior to disposal offsite at licensed waste facility
Control building	Where practicable, buildings will sold on for reuse. Prior to relocation or repurposing of buildings, components to be evaluated for resale or recycling. Waste material to be reused or disposed at licenced waste facility. If demolition, foundation to be left in situ and covered with clean topsoil
Cabling, transmission lines	Underground cabling may be left in situ, or where required to be removed, removed in a way to reduce environmental impact and disturbed areas rehabilitated If decommissioned, overhead lines and towers will be removed

As with the construction phase, the decommissioning activities will potentially generate air quality impacts from dust such as from backfilling activities and vehicle movements; generate noise impacts from equipment operations; and potentially result in contamination of soil and groundwater such as due to fuel storage, handling and leaks. To prevent, manage and control potential impacts to air, noise, soil and groundwater, the same measures as proposed for the construction phase will be implemented.

If improperly managed, traffic movements generated during decommissioning activities have the potential to impact community health and occupational health and safety. Transportation of project infrastructure and components during decommissioning will be in accordance with a Traffic Management Plan.

Decommissioning activities will generate non-hazardous and hazardous wastes. Waste streams generated during the decommissioning process will be managed with emphasis on reduce, reuse, and recycle prior to disposal of wastes. Appropriate waste management practice will be implemented in accordance with the latest legislation and guidelines available at the time of decommissioning and in accordance with an iteration of the Waste Management Plan. As a minimum the same waste handling procedures implemented during the construction and operation phase will be implemented during the decommissioning phase. The location of recycling and disposal facilities will be determined closer to the time of decommissioning. Where waste cannot be reused or recycled, it will disposed of at an appropriate licensed facility with adequate capacity.

Of the generated waste streams, wind turbine blades are typically constructed of composite material requiring complex process to breakdown their material composition[5]. Current composite material recycling methods include:

- Mechanical: Composite is shredded, crushed or milled for separation of resin and fibrous products;
- Pyrolysis: Composite is heated in the absence of oxygen so that polymeric resin is converted to gas or vapour while fibres remain inert and can be recovered;
- Oxidation in fluidized bed: The polymetric matrix is combusted in hot and oxygen rich air flow; and

[5] Cherrington R. et al. 2012 Producer responsibility: Defining the incentive for recycling composite wind turbine blades in Europe. Energy Policy 47: 12-21.

- Chemical: Polymeric resin is decomposed into oils which frees fibres for collection.

The appropriate method for recycling for the wind turbine blades (if not reused) will be determined closer to the decommissioning period and included in an iteration of the Waste Management Plan.

Compared to the construction phase, the likely disturbance footprint associated with the decommissioning activities will be smaller. During decommissioning, components will be dismantled on site and processed into smaller components for transportation for reuse or recycling/disposal. If not transported offsite immediately, they will remain on site temporarily. Rehabilitation works anticipated for existing hardstand and/or road areas, or temporary laydown areas, will be conducted with the objective of returning the site to pre-construction conditions. Revegetation through seeding with native plants will be managed in accordance with an iteration of the Habitat Restoration Plan.

Prior to decommissioning, NZE will continue to engage with community stakeholders in accordance with the Stakeholder Engagement Plan for consideration of feedback in the Decommissioning Environmental Management Plan. Through a variety of methods (e.g. meeting, handouts, social media), the engagement process will seek to present the nature of the proposed decommissioning works including the turbine dismantling procedure and the proposed rehabilitation works, and provide a clear timeline of the proposed decommissioning works.

ERM HAS OVER 140 OFFICES ACROSS THE FOLLOWING COUNTRIES AND TERRITORIES WORLDWIDE

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Kazakhstan
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