

Environmental and Social Action Plan (ESAP) – Choir to Sainshand Transmission Line Project

Key:

NPTG responsibility	Construction Contractor responsibility	NPTG / PIU responsibility
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No.	Action	Environmental & Social Risks (Liability/ Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	Environmental and Social Assessment. Submit the Detailed Environmental Impact Assessment (DEIA) to and obtain permit from Environment and Tourism (MET).	Compliance with EBRD PRs.	EBRD PR1 to EBRD PR10 excluding PR7 & PR9.	NPTG / PIU.	Prior to construction on site	Approved DEIA	
1.2	Environmental and Social Assessment. Incorporate ESAP and ESIA mitigation, management and monitoring measures and permit requirements into contractual arrangements with Construction Contractor.	Compliance of contractors with EBRD PRs.	EBRD PR1 to EBRD PR10 excluding PR7 & PR9.	NPTG / PIU.	Prior to issue of invitation to tender.	<p>Invitation to tender incorporates ESAP and ESIA mitigation measures and permit requirements. This should include as a minimum the requirement for the Construction Contractor to address the following:</p> <ul style="list-style-type: none"> Adopt Project Environmental and Social Management System (ESMS) and Project Environmental and Social Management and Monitoring Plan (ESMMP), including any surveys, monitoring and/or due diligence required. Develop, implement and maintain a detailed Construction ESMMP. Obtain necessary permits and maintain a Legal and Permits Register. Develop a detailed Construction Stakeholder Engagement Plan (SEP). Report on ESMS performance. 	

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1.3	<p>Construction Environmental and Social Management Systems (ESMS).</p> <p>Develop and implement an integrated ESMS that includes Occupational Health and Safety (OHS) and labour standards – to be called the Project ESMS. This should include:</p> <ul style="list-style-type: none"> • Policies, plans and procedures (including the Project ESMMP required to be followed by the Construction Contractor); • Roles and responsibilities (including clear management of interfaces); and • Project schedule/programme to monitor and manage future activities. <p>Relevant requirements during construction should be made the responsibility of the Construction Contractor, monitored by the PIU, and during operation the responsibility of the MRTD.</p> <p><i>[Note: system(s) should generally meet objectives of ISO14001 and ISO 45001, but need not be certified].</i></p>	Optimisation of ESMS management through a formalised system.	EBRD PR1. Good international practice. ISO 14001. ISO 45001.	NPTG / PIU.	Develop prior to construction. Review of compliance of Construction Contractor during construction.	Develop and implement integrated Project ESMS.	
1.4	<p>Construction Environmental and Social Policy.</p> <p>Develop Project policies and Code of Conduct within Project ESMS, covering as minimum:</p> <ul style="list-style-type: none"> • Environmental and Social policy. • Human resources policy (covering labour and working conditions and community health and safety). • Contractor/Supplier policy. • Code of Conduct – to include prohibition of any construction worker using herder wells. • Labour Management Plan for each Contractor, covering temporary workers' accommodation and gender-based violence and harassment (GBVH) – prior to start of construction works. <p>The Construction Contractor shall be required to comply with Project policies.</p>	To ensure delivery of the Project across contractors in compliance with EBRD PRs.	EBRD PR1, PR2, PR4. Good international practice.	NPTG / PIU.	Prior to construction. Review of compliance of contractors during construction.	Policies developed and integrated into Project ESMS.	

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1.5	<p>Construction Environmental and Social Management and Monitoring Plan (ESMMP).</p> <p>The NPTG/PIU will be responsible for updating the ESMMP prepared for disclosure, prior to construction, to reflect final design and the results of additional survey work. This updated "Project ESMMP" will form part of the Construction Contractors contract (see Action #1.1 above)</p> <p>This Project ESMMP should cover as a minimum:</p> <ul style="list-style-type: none"> • Roles and responsibilities • General measures to be employed • Site specific measures to be employed • Inspection and monitoring requirements, including tools • Inspections, audits and reporting • Non-conformance and Accident/Incident procedures 	Optimisation of ESMS management through a formalised system. Contractor management.	EBRD PR1, PR2, PR 3, PR4. Good international practice.	NPTG / PIU.	Disclosed ESMMP to be updated prior to construction. Project ESMMP to be provided in tender documents.	Project ESMMP updated and integrated into Project ESMS management system. Provided to Bank for review and no-objection approval.	
1.6	<p>Construction ESMS, Policies and ESMMP.</p> <p>Develop detailed Construction ESMMP based on the Project ESMS and ESMMP, for approval by NPTG/PIU. Topics to be covered in the Construction ESMMP include as a minimum:</p> <ul style="list-style-type: none"> • Water management • Emergency preparedness and response (see 4.6) • Spill prevention and response • Materials use and management (including borrow pits and quarry management) • Waste management • Cultural heritage • Labour management (including construction camps, temporary accommodation, and GBVH) (see 2.1) • Labour grievance mechanism (see 2.6 to 2.8) • Biodiversity (see PR6) • Traffic management • Occupational Health and Safety (OHS) (see 4.1) • Community health and safety (see 4.2) 	Optimisation of ESHS management through a formalised system. Contractor management.	EBRD PR1, PR2, PR3, PR4, PR8, PR10. Good international practice.	Construction Contractor (and any of their sub-contractors).	Develop detailed Construction ESMMP prior to construction on site. Maintain permanently during construction.	Develop detailed Construction ESMMP, approved by PIU. Plans provided to Bank for review and no-objection approval. Implement detailed Construction ESMMP and report through monthly, quarterly and annual reporting.	

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	<ul style="list-style-type: none"> Air, Noise and Vibration Security Training Plan Site rehabilitation SEP including a community grievance mechanism (see PR10) Training Temporary land requirements (see 5.4) <p>A detailed monitoring plan should be incorporated into the Construction ESMMP.</p>						
1.7	Operations Environmental and Social Management Plan (ESMP). Develop an Operation and Maintenance (O&M) ESMMP.	Optimisation of ESMS management through a formalised system.	EBRD PR1, PR3, PR4. Good international practice.	NPTG / PIU.	Develop prior to operation. Maintain permanently during operation.	Develop detailed O&M ESMMP. O&M Plan provided to Bank for review and no-objection approval.	
1.8	Permits. Develop Project Legal and Permit Register and provide to the Construction Contractor. Monitor Construction Contractor to ensure permits are in place and their compliance with permit requirements.	Compliance with EBRD PRs and Mongolian legislation.	EBRD PR1. Mongolian legislation.	NPTG / PIU.	Develop prior to construction on site. Maintain Project Legal & Permit Register up-to-date during construction and operation.	Project Legal & Permit Register. Maintained overall Project permits and a record of permits obtained.	
1.9	Permits. Ensure a Construction Legal & Permit Register has been developed and relevant permits are in place and compliance with permit requirements for relevant construction activities All necessary permits to be in place prior to the start of permitted activities (e.g. water abstraction permit batching plant, construction camps, borrow pits, etc.).	Compliance with EBRD PRs and Mongolian legislation.	EBRD PR1. Mongolian legislation.	Construction Contractor.	Maintain Construction Legal & Permit Register up-to-date during construction.	Construction Legal & Permit Register. Maintain a record of permits obtained.	
1.10	Organisational Capacity and Commitment (PIU). Clearly identify team structures, organisations roles and responsibilities (NPTG/PIU/EBRD).	Ensure appropriate Organisation Capacity and Competency.	EBRD PR1, PR2. Good international practice.	NPTG / PIU. Cost dependent on resource required for PIU staff.	Prior to start of construction.	PIU Project organogram. Named personnel for roles.	

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	Provide all key roles in an organogram. Assess the capacity of PIU staff, Construction Contractor and other key appointments to manage environmental and social risks and impacts.						
1.11	Organisational Capacity and Commitment (PIU). Appoint and maintain person(s) to be responsible for ESMS within the PIU in accordance with PIU consultant job descriptions.	Ensure appropriate Organisation Capacity and Competency.	EBRD PR1, PR2. Good international practice.	NPTG / PIU. Cost dependent on resource required for PIU staff.	Prior to start of construction.	Appointment of qualified ESMS lead and staff within PIU.	
1.12	Organisational Capacity and Commitment (Contractor). Provide sufficient staffing to manage the ESMS/ESMMP for the construction phase.	Ensure appropriate Organisation Capacity and Competency.	EBRD PR1, PR2. Good international practice.	Construction Contractor.	Prior to start of construction.	Appointment of qualified contractor person, including Contractor ESMS/ESMMP lead, approved by PIU. Named personnel for roles.	
1.13	Construction Contractor Management and Monitoring. Develop and implement Contractor Management Plan to manage ESMS planning and performance of the Contractor throughout the construction phase, including as a minimum: <ul style="list-style-type: none"> Inclusion of relevant ESAP and PR2 requirements in contracts Review of Contractor tenders Review of Contractor policies, procedures and plans upon selection and appointment Verification of training and/or proper credentials for Contractor staff/managers responsible for ESMS Inspection and auditing requirements and frequency 	Contractor management and monitoring.	EBRD PR1, PR2.	NPTG / PIU.	Ongoing.	Tender reviews. Monthly monitoring reports and site inspections.	
1.14	Supply Chain Management. Develop and implement Supply Chain Management Procedure to manage the supply chain in accordance with PR requirements, including as a minimum: <ul style="list-style-type: none"> Review environmental and social risks associated with the supply chain 	Supply chain management.	EBRD PR1, PR2, PR6.	Construction Contractor.	Throughout construction.	Supply Chain Management Procedure. Due Diligence reviews of Supply Chain.	

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	<ul style="list-style-type: none"> Assess the risk of child labour or forced labour being used Assess the risk of safety issues or breaches associated with the supply chain Assess the risk to biodiversity and protected sites associated with the supply chain 						
1.15	Construction Monitoring and Reporting. Verification of training and professional qualifications for Contractor ESMS Manager and staff. Review of Construction ESMMP, policies and practices upon selection and appointment. Conduct regular audit/inspection of Contractor ESMS performance, including inspections of Contractor construction works and camps with action tracking and feedback loop to Contractor. Set up and maintain an ESMS incident reporting procedure to maintain records of annual monitoring, accidents and incidents. The procedure must be overarching, unique and integrated for the Project and used by all contractors. Submit report to the Bank on ESMS, including status of each ESAP action and other agreed activities including resolution of grievances associated with the project.	Continual assessment of ESMS performance against EBRD PRs. Contractor management. To record incidences and apply lessons learned.	EBRD PR1 to EBRD PR10 excluding PR7 & PR9. Good international practice.	NPTG / PIU.	Ongoing during construction (monthly, quarterly and annually).	Inspection reports. Submission of monthly and quarterly reports to Bank on ESMS performance on schedule and in a mutually agreed format. Submission of Environmental and Social Annual Report (ESAR) to Bank.	
1.16	Construction Monitoring and Reporting. Provide regular reports on performance to NPTG/PIU during construction. Provide ESMS incident reporting in accordance with Project procedure. Identification of corrective actions procedure.	Continual assessment of ESMS performance against EBRD PRs. Supply chain management. To record incidences and apply lessons learned.	EBRD PR1 to EBRD PR10 excluding PR7 & PR9.	Construction Contractor.	Requirement for contractor reporting to the NPTG/PIU on ESMS aspects incorporated into tender documents. Monthly, quarterly and annually during construction.	ESMS incident reports. Submission of reports on ESMS compliance on schedule and in a mutually agreed format to PIU. Contractor reports sufficient to allow PIU to include relevant data in reports to the Bank, and to allow evaluation of need for corrective actions.	

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1.17	Operation Monitoring and Reporting. Review of O&M Plan. Set up and maintain an ESMS incident reporting procedure to maintain records of annual monitoring, accidents and incidents. Submit report to the Bank on ESMS, including status of each ESAP action and other agreed activities including resolution of grievances associated with the project.	Continual assessment of ESMS performance against EBRD PRs. To record incidences and apply lessons learned.	EBRD PR1 to EBRD PR10 excluding PR7 & PR9. Good international practice.	NPTG / PIU.	Quarterly or annual monitoring during operation, as agreed with EBRD.	Submission of reports to Bank on ESMS performance on schedule and in a mutually agreed format. Submission of Environmental and Social Annual Report (ESAR) to Bank.	
PR2	Labour and Working Conditions						
2.1	Human Resource (HR) Policies and Working Relationships. Develop and adopt a HR Policy and Labour Management Plan covering all employees, Contractors and Sub-contractors, and incorporate into contractual arrangements with employees and contractors, to include (but not be limited to): <ul style="list-style-type: none"> • Approach to managing its workforce, including third party and supply chain • Management of worker relationships • Access to worker's organisations • Human rights • Working conditions and terms of employment • Child labour and forced labour policies • Equal opportunities and non-discrimination • Prevention of and adequate response to GBVH • Occupational health and safety • Bribery and corruption • Oversight provided of contractor policies/procedures • Access by all workers to policy/procedures in their language(s) • Arrangement for inspections • Effective worker grievance mechanism readily accessible to all project workers 	To ensure management of workforce in line with EBRD requirements and Mongolian Labour Law.	EBRD PR2. Mongolian Labour Law. Good international practice.	NPTG / PIU.	HR policy and Labour Management Plan developed and adopted prior to construction activities commencing. Contractor policies/ procedures reviewed/ approved: prior to work on-site. HR Policies implemented throughout construction and operation.	Project policies and Labour Management Plan prepared and implemented. Project and contractor HR policies compliant with EBRD PR2 and the national Labour Law. Labour focused grievance mechanisms established.	

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2.2	Human Resource (HR) Policies and Working Relationships. Conduct an independent labour audit of the Construction Contractor against PR2 requirements; and report on those findings.	To ensure management of workforce in line with EBRD requirements and Mongolian Labour Law.	EBRD PR2. Good international practice.	NPTG / PIU.	Early during the construction phase	Labour audit report.	
2.3	Local Recruitment Strategy Set targets for Construction Contractor to hire local workers, with preference for those who may be directly affected by noise, traffic, or other project activities.	Provision of equal opportunities and improving economic prospects of local residents.	EBRD PR2. Good international practice.	NPTG / PIU.	Develop prior to construction activities.	Targets to be set by NPTG/PIU in Contractor tender documentation. Targets met by Contractor.	
2.4	Human Resource Policies, Working Relationships, Wages, benefits, and Conditions of Work. Follow Project HR policies and Project Labour Management Plan. Demonstrate employment of local population taking into account gender policy and local skills, with preference for those who may be directly affected by noise, traffic, or other project activities. Provide necessary training to upgrade skills of unskilled local workers. Ensure risk insurance policies available triggered automatically. Demonstrate use of local supply chains. Put arrangements in place for construction workers so that they have access to welfare facilities such as toilets and shaded and/or heated locations for breaks.	To ensure management of workforce in line with EBRD requirements and Mongolian Labour Law. Provision of equal opportunities and improving economic prospects of local residents. To ensure welfare of workers during site preparation and construction activities.	EBRD PR2. Good international practice.	Construction Contractor.	Prior to and during construction.	Detailed Contractor policies and plans provided for approval by NPTG / PIU, including arrangements to be put in place for construction workers prior to start of construction. Report on numbers of local residents employed, taking into account gender policy within the monitoring reports to NPTG / PIU.	
2.5	Wages, Benefits, and Conditions of Work and Accommodation. Ensure temporary accommodation of Contractors/sub-contractors are designed and built in accordance with EBRD/IFC guidance for workers accommodation (2009) including any camps proposed, if relevant.	To minimise the impact of any in-migration of construction workers on local communities. To ensure welfare of workers.	EBRD PR2. Good international practice.	Construction Contractor.	Contractor document prior to construction of labour accommodation, or camp being accommodated by workers.	Necessary permits in place. Workers' Camp Management Plan. Camp set up and maintained in compliance with EBRD requirements. Code of Conduct in place and evidence of training of personnel in the Code.	

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	Identify a suitable location of temporary accommodation and obtain any necessary permits. Adopt Project Code of conduct to be signed by all workers as part of their work contract and ensure all personnel are trained in the Code.						
2.6	Wages, Benefits, and Conditions of Work and Accommodation. Review Construction Contractor's worker accommodation strategy and principles. Undertake periodic camp inspections.	To standardise accommodation provided to workers employed by contractors.	EBRD PR2.	NPTG / PIU.	Prior to and during construction.	Monitoring reports.	
2.7	Workers' Grievance Mechanism. Set up and maintain a formal worker grievance mechanism for Contractor employees and disseminate information about its uses to the workforce in the language(s) of the workers, including possibility of anonymous grievances submission.	To provide a channel for raising workers' concerns and a transparent, consistent mechanism for resolution.	EBRD PR2, PR10. Good international practice.	Construction Contractor.	Develop prior to activities commencing. Implement during construction.	Adoption of formal labour grievance mechanism for contractor employees in line with Project ESMS. Grievances and resolutions to be reported to NPTG / PIU as a minimum in monthly reports.	
2.8	Workers' Grievance Mechanism monitoring. Monitor that the Construction Contractor has a workers' grievance mechanism in place and is addressing these grievances in accordance with their stated procedure.	To ensure workers' concerns are addressed.	EBRD PR2, PR10. Good international practice.	NPTG / PIU.	Implement during construction.	Construction Contractor performance reviews. Performance Submission of grievance data in AESR to Bank.	
2.9	Security Personnel Requirements. Conduct due diligence investigation for all security personnel to make sure they have appropriate licensing, experience and training. Provide evidence to NPTG/ PIU. If security personnel are armed, then train them on UN Voluntary Principles of Human Rights.	Prevent conflict between security personnel and local communities. Prevent potential human rights violations by security personnel.	EBRD PR2.	Construction Contractor.	Prior to employing security personnel. Incident reporting during construction.	Due diligence carried out and documented/reported to NPTG / PIU. Report to EBRD any incidents involving security guards.	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Resource Efficiency.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Prior to construction activities commencing.	Requirement for contractor to prepare details on resource efficiency and include within detailed Construction ESMMP.	

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	Report on resources to be used and efficiency measures to be put in place for energy use, water use, etc.						
3.2	Air Emission Controls and Monitoring. Prepare and implement detailed Construction ESMMP with measures to control fugitive and point source emissions and dust as identified in the ESIA / Project ESMMP. Develop detailed air quality monitoring plan and conduct baseline air quality monitoring in accordance with requirements set out in the ESMMP. Conduct visual dust monitoring daily during construction.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Develop prior to construction activities commencing. Implement prior to and during construction.	Detailed air quality and dust management plan approved by NPTG / PIU. Plans provided to Bank for review and no-objection approval. Pre-construction baseline established. Periodic air quality monitoring, as required. Progress report from Contractor during construction through monthly, quarterly and annual reporting to NPTG / PIU.	
3.3	Pollution Prevention and Control – Waste waters. Prepare and implement detailed Construction ESMMP with enhanced measures on wastewater management in line with the ESIA/ ESMMP. Specify measures to be used on site and at camps.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Develop prior to construction activities commencing. Implement during construction.	Detailed wastewater management plan approved by NPTG / PIU. Plans provided to Bank for review and no-objection approval. Progress report from contractor during construction through monthly, quarterly and annual reporting to NPTG / PIU.	
3.4	Water. Undertake a water needs and impacts assessment for water demand during construction. Prepare and implement detailed Construction Water Management Plan with enhanced measures to protect local water sources in line with the ESIA/ ESMMP. Identify location of herder groundwater supplies prior to construction on site and protect them from damage in construction. Survey of well presence in all areas affected by construction including camps, lay down areas and haul roads.	Management of environmental impacts on receptors.	EBRD PR3. Compliance with regulatory requirements of Mongolia. Good international practice.	Construction Contractor. Contractor.	Develop prior to construction activities commencing. Implement prior to and during construction.	Detailed Construction Water Management Plan approved by NPTG / PIU. Plan provided to Bank for review and no-objection approval. Herder well survey completed and wells demarcated. Permits for water abstraction in place. Well drilling (water supply) method statement for approval by NPTG / PIU. Progress report from contractor during construction through monthly,	

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	<p>Ensure the Code of Conduct prohibits construction workers from using herder wells and that workers are inducted fully on the Code of Conduct.</p> <p>Any water permits required to be obtained prior to abstraction. Provide well drilling (water supply) method statement for any wells proposed. Monitor water use/extraction from groundwater wells.</p>					quarterly and annual reporting to NPTG / PIU.	
3.5	<p>Waste controls.</p> <p>Develop detailed construction Materials use and Waste Management Plan (to include hazardous wastes) as part of the Construction ESMMP, which includes the following:</p> <ul style="list-style-type: none"> • Application of waste hierarchy in project planning to ensure efficient use and management of resources so that priority is to prevent from generation of waste at source as much as possible. • Minimum rate of recovery of at least 60%. • Pre-determine types and amount of waste (especially hazardous waste) to be generated as much as possible in order to enable planning of management actions effectively prior to construction. • Procedures for proper handling of all waste generated and waste segregation/ designated storage locations. • Secondary containment measures for hazardous materials. • Identify licensed facilities for acceptance and disposal of construction waste and other waste streams including hazardous waste. • Obtain related permits and have agreements with relevant local authorities for waste management, including transportation and disposal of solid and liquid waste. 	<p>Management of environmental impacts on receptors.</p> <p>Compliance with regulatory requirements of Mongolia.</p>	<p>EBRD PR3.</p> <p>Compliance with regulatory requirements of Mongolia.</p> <p>Good international practice.</p>	<p>Construction Contractor.</p> <p>NPTG / PIU to preapprove waste disposal routes.</p>	<p>Develop prior to construction activities commencing.</p> <p>Implement during construction.</p>	<p>Detailed management plan approved by NPTG / PIU.</p> <p>Plans provided to Bank for review and no-objection approval.</p> <p>Progress report from contractor during construction through monthly, quarterly and annual reporting to NPTG / PIU.</p>	

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3.6	Noise and Vibration Controls and Monitoring. Prepare and implement detailed Construction ESMMP with enhanced measures to control noise and vibration in accordance with the ESIA/ Conduct a noise survey to identify potential noise impacts at closest noise-sensitive herder households / winter camps to the RoW/ works areas.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Prior to construction activities commencing. Implement prior to and during construction.	Detailed plan approved by NPTG / PIU. Plans provided to Bank for review and no-objection approval. Pre-construction baseline established. Monitoring during construction, where necessary. Progress report from contractor during construction through monthly, quarterly and annual reporting to NPTG / PIU.	
3.7	Soil Erosion and Pollution Controls. Prepare and implement detailed Construction ESMMP in accordance with the ESIA/ ESMMP. This should include planning of any access/ haul roads and temporary works areas/ camps in a way to disturb minimal amount of area and therefore minimum topsoil stripping (ie: maximizing use of existing tracks).	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Prior to construction activities commencing. Implement during construction.	Detailed management plan approved by NPTG / PIU. Plans provided to Bank for review and no-objection approval. Progress report from contractor during construction through monthly, quarterly and annual reporting to NPTG / PIU.	
PR4	Health and Safety						
4.1	Occupational Health and Safety. Prepare and implement detailed Construction OHS Plan. Requirements to include (but not to be limited to): <ul style="list-style-type: none"> • Job and task specific hazard analysis and controls for all activities. • Requirements for and enforcement of PPE use. • Safety training for personnel. • Develop and implement an emergency response procedure. • Maintain statistics of total work hours, lost time, incidents, injuries, near misses etc.; and • Toolbox talks to share information on risks, accident prevention, etc. 	To ensure management of workforce in line with EBRD requirements. To prevent OHS incidences.	EBRD PR2. EBRD PR4. Good international practice. EU OSH Framework.	Construction Contractor.	Develop prior to construction activities.	Detailed OHS Plan for approval by NPTG / PIU. Plans provided to Bank for review and no-objection approval. Progress report from contractor during construction through monthly, quarterly and annual reporting to NPTG / PIU.	

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	<ul style="list-style-type: none"> Ensure no prohibited materials such as asbestos containing materials (e.g. pipes) are procured or used. Identify requirements for managing flood risk. 						
4.2	Occupational Health and Safety. Develop an OHS Plan for the O&M phase.	To ensure management of workforce in line with EBRD requirements. To prevent OHS incidences.	EBRD PR2 EBRD PR4. Good international practice. EU OSH Framework.	NPTG / PIU.	Developed prior to and maintained during operation.	Detailed O&M OHS Plan for review and no-objection approval by the Bank.	
4.3	Community Health and Safety. Develop and implement procedures to protect public health and safety within detailed Construction ESMMP. Procedures to include (but not to be limited to): <ul style="list-style-type: none"> Public notice of construction operations in areas open to the public. Notice to nearby local authorities and communities, including herder households, before major activities and traffic. Public education/awareness raising sessions be held in high risk areas (i.e. construction near winter camps) to make potentially affected people aware of the risks and controls in place. Toolbox talks with workers to ensure workers are aware of measures to avoid risk to local communities; implementation of safe working practices during construction including provision of hazard notices/signs/barriers. Employ adequate measures to prevent unauthorized access to the construction. 	To minimise accidents and incidents with road users, local communities and livestock.	EBRD PR4. Good international practice.	Construction Contractor.	Develop prior to construction activities commencing. Implement during construction.	Detailed management plan/procedures approved by NPTG / PIU. Plans/procedures provided to Bank for review and no-objection approval. Progress report from contractor during construction through monthly, quarterly and annual reporting to NPTG / PIU.	
4.4	Traffic and Road Safety. Develop and implementing traffic management plan as part of the detailed Construction ESMMP. It should include as a minimum:	To minimise accidents and incidents with road users, local communities, herders and livestock.	EBRD PR4. Good international practice.	Construction Contractor.	Develop prior to construction activities commencing.	Detailed management plan/procedures approved by NPTG / PIU. Plans/procedures provided to Bank for review and no-objection approval.	

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	<ul style="list-style-type: none"> Management of haul / access roads and haul traffic. Provision of safe access and egress across works. Construction vehicles to keep to agreed access routes, minimise risk and disruption to project affected communities and other road users and adhere to speed limits. Appropriate management of interaction of construction traffic with public road users, such as use of traffic marshals/flagmen. Complex traffic control to be coordinated in liaison with the Road Police. 				Implement during construction.	Progress report from contractor during construction through monthly, quarterly and annual reporting to NPTG / PIU.	
4.5	Natural Hazards. Information to be provided on the final location of pylons in relation to ephemeral streams to prevent potential destabilisation during periods of heavy rain.	To ensure design address climate resilience and reduces risk of floods affecting proposed infrastructure.	EBRD PR4, PR1.	Internal resource (NPTG) and their design consultants.	In final design	Incorporation of appropriate measures into final design.	
4.6	Exposure to Disease and GBVH risks. Develop and implement measures as part of the detailed Construction ESMMP; to include as a minimum: <ul style="list-style-type: none"> Disease control measures Construction workers' camps measures to meet IFC/EBRD requirement, especially hygiene standards Medical surveillance of all workers to detect the risk of any STDs to workers and the general public Toolbox talks with workers Regular training and communications to workers on understanding GBVH risks in affected communities Communicate to PAPs the expectations of project workers to abide by the Code of Conduct, including zero tolerance for sexual harassment, exploitation and abuse, and reporting channels available 	To minimise spread of diseases.	EBRD PR4. Good international practice.	Construction Contractor.	Develop prior to construction activities commencing. Implement during construction.	Detailed management plan/procedures approved by NPTG / PIU. Plans/procedures provided to Bank for review and no-objection approval. Progress report from contractor during construction through monthly, quarterly and annual reporting to NPTG / PIU.	

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4.7	Emergency Preparedness and Response. Prior to construction on site, the Emergency Preparedness and Response Plan should be developed in full as part of the Construction ESMMP. It should include as a minimum: <ul style="list-style-type: none"> • Identification of potential emergencies and risk assessments • Roles and responsibilities • Development of procedures to respond to identified emergencies • Equipment required e.g. first aid facilities, firefighting equipment, etc. • Testing and inspection regimes for emergency equipment • Muster points. evacuation routes • Training requirements • Communication protocols to workers, public and other affected parties • Location of nearest medical facilities • Update and review cycle This plan should be developed and implemented in liaison with local community members, authorities and emergency services.	Prepare for emergencies to minimise negative impacts.	EBRD PR4. Good international practice.	Construction Contractor.	Develop prior to construction activities commencing. Implement during construction.	Detailed management plan/procedures approved by NPTG / PIU. Plans/procedures provided to Bank for review and no-objection approval. Progress report from contractor during construction through monthly, quarterly and annual reporting to NPTG / PIU.	
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	Consultation and Grievance Mechanism. Implement the Project SEP and a formal grievance mechanism, for continued consultation with people affected by land acquisition and / or livelihood impacts (temporary or permanent). Grievance mechanism log to be maintained by NPTG / PIU for land acquisition.	Avoid misunderstandings and provide up-to-date information on land acquisition activities.	EBRD PR5.	NPTG or their Technical Consultants)/ PIU.	Ongoing.	Document SEP implementation by keeping records of meetings and participants, information dissemination activities, etc. Project land acquisition community grievance mechanism and log.	
5.2	Land Acquisition Documentation. With the support of a Resettlement Expert, undertake detailed asset survey of the final design route and confirm whether any physical or economic displacement will take place. Undertake	Ensure compliance with EBRD requirements.	EBRD PR5.	NPTG (or their Technical Consultants)/ PIU.	Prior to construction works.	RAP/ LRP Reports prepared. Database of Project Displaced Persons.	

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	<p>socio-economic survey of displaced persons in accordance with the Land Acquisition and Resettlement Framework (LARF) requirements.</p> <p>Provide map / list of Project Displaced Persons within Project footprint and/or any additional winter camps near the footprint where it is agreed that these need to be displaced either permanently or temporarily.</p> <p>As necessary, and with the support of a Resettlement Expert, prepare a Resettlement Action Plan (RAP)/Livelihoods Restoration Plan (LRP) in accordance with the LARF.</p> <p>The surveys and RAP/LRP reports will include any temporary locations identified by Construction Contractor, where selected locations cannot be acquired via negotiated and voluntary transactions.</p>						
5.3	<p>Land Acquisition Implementation.</p> <p>Agree compensation measures with Project Displaced Persons.</p> <p>All compensation disbursed/delivered prior to start of works on site with affected asset.</p> <p>Obtain all information and evidence of agreements with Project Displaced Persons and disbursement/delivery of these measures e.g. photos, signed agreements.</p> <p>Maintain a grievance register and address grievances related to land requirements.</p>	To develop the LARF. Ensure compliance with EBRD requirements.	EBRD PR5.	NPTG (or their Technical Consultants)/ PIU.	Prior to construction works that will affect asset identified.	Records of all land acquisition activities, Land acquisition agreements, and disbursements/delivery. Provide evidence of completed process to EBRD. Number and nature of grievances and how these have been addressed.	
5.4	<p>Monitoring.</p> <p>Monitoring of the land acquisition and compensation activities to ensure compliance with EBRD PR5. Any gaps will be identified and notified to the PIU to address.</p>	Ensure compliance with EBRD requirements.	EBRD PR5.	NPTG / PIU.	After completion of land acquisition.	RAP/LRP monitoring report.	
5.5	<p>Temporary Land Requirements Documentation and Implementation.</p> <p>Ensure all temporary land requirements (e.g. construction camps, borrow pits, haul roads, etc.)</p>	Ensure compliance with EBRD requirements.	EBRD PR5	Construction Contractor.	Prior to construction works.	Evidence of negotiated and voluntary transactions for temporary land requirements. Contractor procedure to ensure compliance with RAP/ LRP.	

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	are secured through negotiated and voluntary transactions. Where this is not possible, where the land take results in temporary or permanent physical and/or economic displacement, these impacts will be identified, quantified and compensated in compliance with the RAP/ LRP prepared by NPTG – see 5.2 above.					Evidence of minimisation of displacement impacts where possible.	
5.6	Independent Audit. Independent completion audit.	Ensure compliance with EBRD requirements.	EBRD PR5.	EBRD.	After completion of land acquisition.	Independent PR5 completion audit at the end of the project on all RAPs/LRP implemented.	
PR6	Biodiversity and Living Natural Resources						
6.1	Conservation of Biodiversity. Survey of any areas to be specifically affected / cleared as a result of the construction works, including areas that may contain ground-level nests. Additional mitigation measures identified by ecologist to be incorporated into Construction ESMMP. Ensure permits in place for vegetation clearance.	Biodiversity protection. Compliance with EBRD requirements and EU Birds Directive.	EBRD PR1, PR6. EU Birds Directive. International Best Practice.	Construction Contractor.	Prior to vegetation clearance.	Survey completed and pre-construction survey report prepared. Additional mitigation measures incorporated into Construction ESMMP. Land Disturbance Permit in place.	
6.2	Conservation of Biodiversity. Ensure written permission from the relevant local authorities for the two locally protected sites that are within the RoW, before construction starts. This must include haul road and any temporary site permissions based on actual locations.	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	Construction Contractor.	Prior to construction activities commencing.	Relevant permissions/permits.	
6.3	Conservation of Biodiversity. Provision of best-design bird flight diverters on conductors and earth wires following manufactures recommendations for spacing along the entire transmission line route. As a minimum these need to cover the sites identified in Appendix 1.	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	NPTG (design consultants)	Prior to construction.	Inclusion of measures identified as identified in the ESIA Report in final design.	
6.4	Conservation of Biodiversity.	Biodiversity protection.	EBRD PR1, PR6.	Construction Contractor.	Post-construction.	Rehabilitation report.	

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	Ensure reinstatement of affected areas following construction works.	Compliance with EBRD requirements.	International Best Practice.			Trees planted.	
6.5	Conservation of Biodiversity. Contract qualified bird specialists to undertake routine monitoring of powerlines for bird carcasses and to design alternative adaptive management measures to increase bird diverter placement or other measures in areas with high mortality rates; and to Monitor Saker falcon and Steppe eagle species nests on the powerline towers and construct alternative structures for nesting if the nests on the powerline become a collision risk issue.	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	NPTG	During operation.	Annual review / report of bird collision. Implementation of additional mitigation measures, if required.	
PR7	Indigenous People						
7.1	Not applicable.						
PR8	Cultural Heritage						
8.1	Assessment and Management of Impacts on Cultural Heritage. Undertake detailed Archaeological, palaeontological and ethnic survey along the line route and any areas that will be disturbed by the proposed works by a qualified specialist in accordance with Mongolian law.	Preserve sites of cultural significance. Respecting traditions and customs. Compliance with Mongolian law.	EBRD PR1, PR8. Mongolian law. International Best Practice.	Construction Contractor.	Prior to construction activities commencing.	Pre-construction Archaeological, palaeontological and ethnic survey report. Incorporation of mitigation measures into detailed Construction ESMMP.	
8.2	Assessment and Management of Impacts on Cultural Heritage. Prepare and implement Cultural heritage management and chance finds procedure as part of detailed Construction ESMMP. Conduct training on chance finds procedure.	Preserve sites of cultural significance. Respecting traditions and customs.	EBRD PR1, PR8. International Best Practice.	Construction Contractor.	Prior to construction activities commencing. Implement during construction.	Cultural heritage and chance finds procedure in the Construction ESMMP. Plans provided to Bank for review and no-objection approval. Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.	

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PR10	Information Disclosure and Stakeholder Engagement						
10.1	Construction SEP and Grievance Mechanism. NPTG/PIU to assign a Stakeholder Engagement expert to support the development and implementation of a detailed SEP covering pre-construction and construction activities and overall management of stakeholder engagement across the Project and the Contractor.	Compliance with EBRD requirements.	EBRD PR1, PR10.	NPTG / PIU.	Prior to construction activities commencing. Implement during construction.	Stakeholder engagement expert in place.	
10.2	Construction SEP and Grievance Mechanism. Manage and review Contractor stakeholder engagement performance.	Compliance with EBRD requirements.	EBRD PR1, PR10.	NPTG / PIU.	Implement during construction and operation.	Reports on Contractor stakeholder engagement performance.	
10.3	Construction SEP and Grievance Mechanism. Contractor to appoint a Community Liaison Officer (CLO) prior to the start of the construction works to led on the SEP and stakeholder engagement.	Compliance with EBRD requirements.	EBRD PR1, PR10.	Construction Contractor.	Prior to construction activities commencing. Implement during construction.	Community Liaison Officer (CLO) in place.	
10.4	Construction SEP and Grievance Mechanism. Building on the Project SEP, develop and implement detailed Construction SEP and community grievance mechanism. Ensure early notice to local communities and herder households prior to major project activities that could affect them. Undertake public education/awareness raising sessions in high risk areas (i.e. herder winter camps). Grievance mechanism log and reporting.	Compliance with EBRD requirements.	EBRD PR1, PR10.	Construction Contractor.	Develop prior to construction on site. Implement pre- and during construction.	Construction SEP approved by PIU. Evidence of disclosure of Project information. Grievance mechanism log and records.	
10.5	Construction SEP and Grievance Mechanism. Where necessary, the engagement measures including disclosure requirements identified in the SEP will be adapted to current COVID-19 restrictions.	Compliance with EBRD requirements. Compliance with Government requirements related to COVID-19.	EBRD PR1, PR10.	Construction Contractor.	Implement and constantly monitor changes required during construction.	Evidence on latest Government guidance on COVID-19. SEP identifying alternative methods for engagement. Evidence of disclosure of Project information.	

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10.6	Operation phase SEP and Grievance Mechanism. Develop grievance mechanism for the operation phase. Manage and review response to grievances.	Compliance with EBRD requirements.	EBRD PR1, PR10.	NPTG / PIU.	Implement during operation.	Grievance mechanism log and records.	

Appendix 1: Flights diverter minimum sites

VP	LATITUDE	LONGITUDE	ELEVATION (M)	Sensitivity
VP02	46.30201	108.35526	1246	Oriental plover display sites
VP05	46.00905	108.62347	1195	Pallas sandgrouse habitat areas
VP06	45.95617	108.70531	1250	Oriental plover display sites Pallas sandgrouse habitat areas Saker falcon sensitive sites Cinereous vulture sensitive sites
VP07	45.89348	108.81187	1224	Pallas sandgrouse habitat areas
VP08	45.80849	108.94410	1263	Pallas sandgrouse habitat areas Swan goose sensitive sites
VP10	45.72264	109.06933	1166	Pallas sandgrouse habitat areas Steppe eagle sensitive sites Cinereous vulture sensitive sites
VP11	45.67045	109.15140	1122	Pallas sandgrouse habitat areas Saker falcon sensitive sites

VP	LATITUDE	LONGITUDE	ELEVATION (M)	Sensitivity
				Steppe eagle sensitive sites
VP12	45.57690	109.25544	1002	Pallas sandgrouse habitat areas Saker falcon sensitive sites Cinereous vulture sensitive sites
VP14	45.44394	109.44450	998	Oriental plover display sites Steppe eagle sensitive sites Cinereous vulture sensitive sites
VP15	45.36727	109.54872	988	Oriental plover display sites
VP16	45.31275	109.64027	980	Oriental plover display sites Steppe eagle sensitive sites Cinereous vulture sensitive sites
VP17	45.24983	109.72595	974	Oriental plover display sites Steppe eagle sensitive sites
VP18	45.19928	109.79927	933	Pallas sandgrouse habitat areas Saker falcon sensitive sites

VP	LATITUDE	LONGITUDE	ELEVATION (M)	Sensitivity
VP20	45.04653	110.00687	959	Pallas sandgrouse habitat areas
VP22	44.98473	110.10219	897	Pallas sandgrouse habitat areas

