

Environmental and Social Action Plan (ESAP) – Tyup-Karakol Road Project

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. Ensure measures set out in the ESIA are incorporated into the detailed design. ESIA Disclosure Package, including the ESMP, to form part of Detailed Design Consultant tender documentation. Any deviations from these accepted recommendations must be agreed in advance with the Bank.	Compliance of the design with EBRD PRs.	EBRD PR1 to EBRD PR10 excluding PR7 & PR9.	MoT.	Prior to construction.	Incorporation of recommended measures into final design. Independent Road Safety Audit on detailed design complete. Updated ESIA Report, as relevant to changes in design.	
1.2	Environmental and Social Assessment. Prepare national EIA and obtain EIA permit.	Compliance with national legislation.	Law on Environmental Protection, N 53 1999 (last update 2019) Regulation on Procedure for Conducting EIA in the Kyrgyz Republic, N 60 2015	MoT.	Prior to construction.	National EIA Report and issued EIA permit.	
1.3	Project Environmental and Social Management Systems (ESMS). Develop and implement an integrated ESMS (called the "project ESMS") that includes Occupational Health and Safety (OHS). The ESMS should generally meet objectives of ISO14001 and ISO 45001 but does not need to be certified. This should include: <ul style="list-style-type: none"> Project related environmental and social policies and procedures (Note 1) ESIA Report and national EIA Project ESMP Legal and Permit Register 	Optimisation of ESMS management through a formalised system. Ensure appropriate Organisation Capacity and Competency.	EBRD PR1. Good international practice. ISO 14001. ISO 45001.	MoT / PIU Consultant.	Develop prior to construction. Review of compliance of contractors during construction.	Develop and implement integrated Project ESMS. Development of project policies within ESMS. ESMS to be followed by all Contractors. Project Code of Conduct signed by all Contractors and Sub-contractors working on the Project. MoT Project delivery organogram. Named personnel for roles for oversight and monitoring Contractors, including name and roles of Construction Supervision Engineer and PIU Consultant.	

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	<ul style="list-style-type: none"> Project SEP Project LARP, if required MoT roles and responsibilities, including those of the PIU consultant and the Supervision Engineer (Note 2) Project schedule/programme <p><i>Note 1: Project environmental and social policies within Project ESMS should cover:</i></p> <ul style="list-style-type: none"> Environmental policy Social policy Human resources policy (covering labour and working conditions and community health and safety and gender) Contractor/Supplier policy Project Code of Conduct Labour Management policy covering temporary workers' accommodation and gender-based violence and harassment (GBVH). <p><i>Note 2: Clearly identify team structures, organisations roles and responsibilities (MoT/PIU Consultant/Construction Supervision Engineer/EBRD). Assess the capacity of MoT staff, PIU and Construction Supervision Engineer.</i></p>					Appointment of qualified ESMS lead for the Project within MoT / PIU Consultant.	
1.4	<p>Project Environmental and Social Management Plan (ESMP).</p> <p>The MoT with the PIU Consultant will be responsible for updating the ESIA Disclosure ESMP following detailed design to reflect final design and the results of additional survey work (e.g., ecology and displacement impacts. This updated "Project ESMP" shall form part of the tender documentation.</p> <p>The aspects to be updated in Project ESMP are:</p> <ul style="list-style-type: none"> Detailed roles and responsibilities Site specific measures to be employed Inspection and monitoring requirements, including tools Inspections, audits and reporting 	<p>Optimisation of ESMS through a formalised system.</p> <p>Contractor management.</p>	<p>EBRD PR1, PR 3, PR4.</p> <p>Good international practice.</p>	MoT / PIU Consultant.	Updated ESMP to be provided in tender documents.	<p>Project ESMP updated and integrated into Project ESMS and into Construction Contract.</p> <p>Provided to Bank for review and no-objection approval.</p>	

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	<ul style="list-style-type: none"> Non-conformance and Accident/Incident procedures 						
1.5	<p>Environmental and Social Assessment and ESMP.</p> <p>Incorporate ESAP and ESIA/ESMP mitigation, management and monitoring measures and permit requirements into contractual arrangements with Construction Contractor.</p> <p>The Construction Contractor must follow the Project ESIA/ESMP/ESAP.</p>	Compliance of contractors with EBRD PRs.	EBRD PR1 to EBRD PR10 excluding PR7 & PR9.	MoT.	Prior to issue of invitation to tender - June 2019.	<p>Invitation to tender to incorporate ESAP, ESIA and ESMP mitigation measures and permit requirements. This should include as a minimum the requirement for Contractors to address the following:</p> <ul style="list-style-type: none"> Adopt Project Environmental and Social management system (ESMS) and Project ESMP, including any surveys, monitoring and/or due diligence required. Develop, implement and maintain detailed Construction ESMP. Obtain necessary permits and maintain permits/register. Develop detailed Construction Stakeholder Engagement Plan (SEP). Report on ESMS performance to the MoT during the contract period. 	
1.6	<p>Construction ESMS, Policies and ESMP.</p> <p>Implement the Project ESMS.</p> <p>Develop and implement detailed Construction ESMP, comprising specific management plans and associated monitoring requirements (. The management plans should, as necessary, identify impacts of proposed location of borrow pits, construction camps and any temporary works areas including any haul/access roads.</p> <p>The specific plans to be prepared as a minimum include:</p> <ul style="list-style-type: none"> Water management Emergency preparedness and response (see #4.10) 	<p>Optimisation of ESMS through a formalised system.</p> <p>Contractor management.</p>	<p>EBRD PR1, PR3, PR4.</p> <p>Good international practice.</p>	Construction Contractor (and any of their sub-contractors).	<p>Developed and approved prior to construction on site.</p> <p>Maintain permanently during construction.</p>	<p>Develop detailed Construction ESMP, approved by MoT, and Construction Supervision Engineer and PIU Consultant.</p> <p>Plans provided to Bank for review as required.</p> <p>Implement Construction ESMP and report through monthly, quarterly and annual reporting.</p> <p>Training records on aspects of the Code of Conduct and GBVH.</p> <p>Grievances related to Code of Conduct.</p>	

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	<ul style="list-style-type: none"> • Spill prevention and response • Materials use (including borrow pits and quarry management) and waste management • Hazardous materials management • Cultural heritage • Labour management (including construction camps, temporary workers' accommodation camp(s), and GBVH) • Labour grievance mechanism (see PR2) • Biodiversity (see PR6) • Traffic management (on and off construction site areas) (see 4.4) • Occupational Health and Safety (OHS) (see 4.6) • Community health and safety (see 4.8) • Air emissions • Noise and vibration • Security • Training Plan. <i>See Note 3.</i> • Site rehabilitation • Stakeholder Engagement Plan including a community grievance mechanism (see PR10) • As required, land acquisition and resettlement plan (see PR5) <p><i>Note 3.</i></p> <p><i>Regular training and communication should be undertaken with workers on understanding GBVH risks in affected communities.</i></p> <p><i>Training is also required on the Code of Conduct. Construction workers will be expected to abide by this Code, including zero tolerance for sexual harassment, exploitation and abuse, and reporting channels available.</i></p>						
1.7	<p>Operation Environmental and Social Management Plan (ESMP).</p> <p>Develop an Operation and Maintenance (O&M) ESMP.</p>	Optimisation of ESMS through a formalised system.	EBRD PR1, PR3, PR4. Good international practice.	MoT.	Develop prior to operation. Maintain permanently during operation.	Develop detailed O&M ESMP. Plans provided to Bank for review as required.	

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1.8	Permits. Overarching Legal and Permit register to be developed and provided to Construction Contractor. Monitor Construction Contractor to ensure permits are in place and their compliance with permit requirements.	Compliance with EBRD PRs and Kyrgyz legislation.	EBRD PR1. Kyrgyz legislation.	MoT / PIU Consultant.	Develop prior to construction on site. Maintain Project permit register up-to-date during construction and operation.	Project Legal and Permit Register.	
1.9	Construction 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 workers' accommodation camp(s), borrow pits, etc.).	Compliance with EBRD PRs and Kyrgyz legislation.	EBRD PR1. Kyrgyz legislation.	Construction Contractor.	Maintain Permit Register up-to-date during construction and operation.	Obtain permits. Maintain Construction Legal and Permit Register and keep a record of permits obtained.	
1.10	MOT / Project Organisational Capacity and Commitment (PIU). Ensure person(s) responsible for ESMS performance are appointed within the PIU Consultant and the Construction Supervision Engineer organisation: <ul style="list-style-type: none"> PIU Consultant – as a minimum, an ESMS lead and an H&S lead. Construction Supervision Engineer – as a minimum, site staff 1x E&S lead and 1x H&S lead. 	Ensure appropriate Organisation Capacity and Competency.	EBRD PR1, PR2. Good international practice.	MoT.	Prior to start of construction.	Named personnel for roles within PIU Consultant and Construction Supervision Engineer organisation.	
1.11	Contractor Organisational Capacity and Commitment. Provide sufficient staffing to manage the ESMS performance of the construction phase. This will include as a minimum: <ul style="list-style-type: none"> ESMS Lead E&S Lead and support staff on site (x2 minimum) 	Ensure appropriate Organisation Capacity and Competency.	EBRD PR1, PR2. Good international practice.	Construction Contractor.	Prior to start of construction.	Appointment of qualified Contractor personnel as listed, approved by MoT / PIU Consultant and Construction Supervision Engineer. Named personnel for roles.	

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	<ul style="list-style-type: none"> H&S Lead and support staff on site staff (x2 minimum) Community Liaison Officer (CLO) Traffic marshals <p>This will also include, as specific to the works being undertaken, the following:</p> <ul style="list-style-type: none"> Ecological Clerk of Works Cultural Heritage Specialist Noise specialist Air quality specialist <p>MoT or Construction Supervision Engineer to review capacity and capability of Contractor ESMS staff.</p>						
1.12	<p>Project Supply Chain Management.</p> <p>Develop and implement Supply Chain Management Plan to manage planning and performance of construction supply chain, including as a minimum:</p> <ul style="list-style-type: none"> Inclusion of relevant ESAP requirements in contracts/subcontracts. 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/Supply chain management.	EBRD PR1, PR2.	MoT / Construction Supervision Engineer.	Ongoing.	Supply Chain Management Plan. Tender reviews.	
1.13	<p>Construction Monitoring and Reporting.</p> <p>Verification of training and professional qualifications for Contractor ESMS managers and staff.</p> <p>Review of Contractor's detailed Construction ESMP, policies and practices upon selection and appointment.</p> <p>Conduct regular audit/inspection of Contractors' ESMS performance, including inspections of</p>	<p>ESMS assessment of ESMS performance against EBRD PRs.</p> <p>Contractor/supply chain management.</p> <p>To record incidences and apply lessons learned.</p>	<p>EBRD PR1 to EBRD PR10 excluding PR7 & PR9.</p> <p>Good international practice.</p>	MoT / Construction Supervision Engineer (on site) / PIU Consultant	Ongoing during construction (monthly, quarterly and annually).	<p>Inspection reports.</p> <p>Submission of reports to Bank on ESMS performance on schedule and in a mutually agreed format, every six months during construction.</p> <p>Submission of Annual Environmental and Social Report (AESR) to Bank during Project life.</p>	

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	Contractors' 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 reports to the Bank on ESMS, including status of each ESAP action and other agreed activities including resolution of grievances associated with the project.						
1.14	Contractor Construction Monitoring and Reporting. Provide regular reports on performance to MoT / PIU Consultant and Construction Supervision Engineer during construction. Provide ESMS incident reporting in accordance with Project procedure. Identification of corrective actions procedure.	Continual assessment of ESMS performance against EBRD PRs. To record incidences and apply lessons learned.	EBRD PR1 to EBRD PR10 excluding PR7 & PR9.	Construction Contractor.	Monthly, quarterly and annually during construction.	ESMS incident reports. Submission of reports on ESMS compliance on schedule and in a mutually agreed format to MoT / Construction Supervision Engineer / PIU Consultant. Construction Contractor reports sufficient to allow MoT / PIU Consultant and Construction Supervision Engineer to include relevant data in reports to the Bank, and to allow evaluation of need for corrective actions.	
PR2	Labour and Working Conditions						
2.1	Working Relationships. Develop a 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 the supply chain (and workforce of the supply chain). Approach to managing its workforce i.e. direct employees. Access to worker's organisations. Working conditions and terms of employment. 	To ensure management of workforce in line with EBRD requirements and Kyrgyz Labour Law.	EBRD PR2. Kyrgyz Labour Law. Good international practice.	MoT.	Labour Management Plan including HR policy developed prior to activities commencing on site. Plan and 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.	

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	<ul style="list-style-type: none"> Child labour and forced labour policies. Equal opportunities and non-discrimination. 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. 						
2.2	Human Resource Policies and Working Relationships. Set targets for and encourage 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.	Good international practice.	MoT.	Develop prior to construction activities.	Goals identified in tender documentation.	
2.3	Human Resource Policies, Working Relationships, Wages, Benefits, and Conditions of Work. Develop Construction Labour Management Plan including HR policy statement. This should cover: <ul style="list-style-type: none"> Approach to managing the supply chain (and workforce of the supply chain). Approach to managing its workforce i.e. direct employees. 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 Gender Based Violence and Harassment (GBVH). Occupational health and safety. Bribery and corruption. 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 Kyrgyz 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.	Developed and approved prior to construction. Implement during construction.	Detailed Contractor policies and plans provided for approval by MoT / PIU Consultant and Construction Supervision Engineer, 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 MoT / PIU Consultant and Construction Supervision Engineer.	

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	<ul style="list-style-type: none"> Local content - the Contractor should put in place a plan for hiring of the 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. Reporting on numbers hired from the local community. Approach to training to provide necessary training to upgrade skills of unskilled local workers. Arrangements for construction workers so that they have access to welfare facilities such as toilets and shaded and/or heated locations for breaks on construction sites. Ensure risk insurance policies availability triggered automatically. 						
2.4	Conditions of Accommodation. Provide labour accommodation strategy and principles, in accordance with EBRD guidance for workers accommodation camps. Identify a suitable location of accommodation and obtain any necessary permits. Adopt Project Code of Conduct and ensure all personnel are trained in the Code.	To ensure welfare of workers.	EBRD PR2. Good international practice. Workers' accommodation: processes and standards - ¹ A guidance note by IFC and the EBRD.	Construction Contractor.	Contractor document prior to construction of labour accommodation, or camp being accommodated by workers.	Necessary permits in place. Workers' Accommodation 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.	
2.5	Conditions of Accommodation. Review Contractor's workers' accommodation strategy, principles, and plan, as relevant. Undertake periodic camp inspections.	To standardise accommodation provided to workers employed by contractors.	EBRD PR2.	MoT / Construction Supervision Engineer.	Prior to and during construction.	Camp/accommodation inspection monitoring reports.	
2.6	Construction Phase Labour Grievance Mechanism. Set up and maintain a formal labour grievance mechanism for employees and disseminate information about its uses to the workforce in the	To provide a channel for raising workers' concerns and a transparent, consistent mechanism for resolution.	EBRD PR2, PR10. Good international practice.	Construction Contractor.	Developed and approved prior to activities commencing. Implement during construction.	Adoption of formal labour grievance mechanism for contractor employees in line with Project ESMS. Grievances and resolutions proposed to be reported to MoT / PIU Consultant and Construction	

¹ https://www.ebrd.com/downloads/about/sustainability/Workers_accomodation.pdf

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	language(s) of the workers, including possibility of anonymous grievances submission.					Supervision Engineer in monthly reports, or to frequency as agreed.	
2.7	Security Personnel Requirements. Conduct due diligence investigation for all security personnel to make sure they have appropriate licensing, experience and training. Provide evidence to the MoT / Construction Supervision Engineer.	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 MoT / PIU Consultant and Construction Supervision Engineer. Report to EBRD any incidents involving security guards.	
2.8	Project Labour Grievance Mechanism. Set up and maintain a Project formal labour grievance mechanism for employees and contractors and disseminate information about its uses to the workforce in the language(s) of the workers/ contractors, 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.	MoT.	Developed prior to activities commencing on site. Implementation during construction and operation.	Adoption of formal Project labour grievance mechanism. Submission of AESR to Bank.	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Resource Efficiency. Report on resources to be used and efficiency measures to be put in place for energy use, water use, etc.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Prior to construction activities commencing and during construction.	Requirement for Contractor to prepare details on resource efficiency and include within Construction ESMP.	
3.2	Air Emission Controls and Monitoring. Prepare and implement detailed Construction ESMP with measures to control fugitive emissions and point source emissions and dust as identified in the updated ESIA/Project ESMP. Crusher site and mixing plants should be located at least 1 km downwind from receptors. Develop detailed Air Quality Monitoring Plan and conduct baseline air quality monitoring in accordance with requirements set out in the Project ESMP.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Developed and approved prior to construction activities commencing. Implement prior to and during construction.	Detailed Air Quality Management Plan approved by MoT / PIU Consultant and Construction Supervision Engineer. Pre-construction baseline established. Periodic air quality monitoring, as required. Progress report from Contractor during construction through monthly, quarterly and annual reporting to PIU.	

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	Conduct visual dust monitoring daily during construction.						
3.3	Pollution Prevention and Control – Waste waters. Prepare and implement detailed Construction ESMP with enhanced measures on wastewater management in line with the updated ESIA/Project ESMP. Specify measures to be used on site and at camps.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Developed and approved prior to construction activities commencing. Implement during construction.	Detailed wastewater management plan approved by MoT / PIU Consultant and Construction Supervision Engineer. Progress report from Contractor during construction through monthly, quarterly and annual reporting to 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 updated ESIA/Project ESMP. Any water permits required to be obtained prior to abstraction. Provide water supply method statement for any wells proposed.	Management of environmental impacts on receptors.	EBRD PR3. Compliance with regulatory requirements of Kyrgyz. Good international practice.	Construction Contractor.	Developed and approved prior to construction activities commencing. Implement prior to and during construction.	Detailed Construction Water Management Plan approved by MoT / PIU Consultant and Construction Supervision Engineer. Permits for water abstraction in place. Water supply method statement for approval by MoT / PIU Consultant and Construction Supervision Engineer (as applicable). Progress report from Contractor during construction through monthly, quarterly and annual reporting to Construction Supervision Engineer.	
3.5	Waste controls. Develop detailed construction Materials Use and Waste Management Plan (to include hazardous wastes) as part of the Construction ESMP in line with the Project ESIA/ESMP requirements. 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; and minimum rate of recovery of at least 60%.	Management of environmental impacts on receptors. Compliance with regulatory requirements of Kyrgyz.	EBRD PR3. Compliance with regulatory requirements of Kyrgyz. Good international practice.	Construction Contractor.	Developed and approved prior to construction activities commencing. Implement during construction.	Detailed Materials Use and Waste Management Plan approved by MoT / PIU Consultant and Construction Supervision Engineer. Construction Supervision Engineer to preapprove waste disposal routes. Progress report from Contractor during construction through monthly, quarterly and annual reporting to Construction Supervision Engineer.	
3.6	Noise and Vibration Controls and Monitoring. Prepare and implement detailed Construction ESMP with enhanced measures to control noise	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Developed and approved prior to construction	Detailed plan approved by MoT / PIU Consultant and Engineer Construction Supervision Engineer. Pre-construction baseline established.	

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	and vibration in accordance with the updated ESIA/Project ESMP. Conduct a pre-construction baseline noise and vibration survey in accordance with requirements set out in the Project ESMP.				activities commencing. Implement prior to and during construction.	Monitoring during construction. Progress report from contractor during construction through monthly, quarterly and annual reporting to Construction Supervision Engineer.	
3.7	Soil Erosion and Pollution Controls. Prepare and implement detailed Construction ESMP in accordance with the updated ESIA/Project ESMP. This should include planning of any cut and fill slopes, haul roads and temporary works areas/ workers' accommodation camps in a way to disturb minimal amount of area and therefore minimum topsoil stripping (ie: maximizing use previous dirt roads). It should also take into account any requirements for soil protection in relation to permafrost, where relevant along the road.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Developed and approved prior to construction activities commencing. Implement during construction.	Detailed management plan approved by MoT / PIU Consultant and Construction Supervision Engineer. Progress report from contractor during construction through monthly, quarterly and annual reporting to Construction Supervision Engineer.	
PR4	Health and Safety						
4.1	Ensure noise impacts based on final design are assessed (including noise modelling as required for Tyup town) to identify specific noise mitigation measures (e.g. noise barriers) are identified and incorporated into the design in the locations as considered necessary. Undertake post-construction noise monitoring in Tyup town at noise sensitive receptors and, in case of the noise level exceedances, provide additional noise mitigation measures (e.g., barriers).	Avoid community noise impacts	EBRD PR4	MoT / Detailed Design Consultant.	Prior to construction Post construction and based on the results of noise monitoring	Noise barriers are incorporated into the design. Noise monitoring report. Corrective plan for noise mitigation during operation phase if needed.	
4.2	Natural Hazards. Detailed design details to be provided on drainage channels and design of bridges and stability of embankment slopes, in particular measures to be employed to prevent potential destabilisation during periods of heavy rain.	To ensure design address climate resilience and reduces risk to road users and local communities.	EBRD PR4, PR1.	MoT / Detailed Design Consultant.	In final design	Incorporation of appropriate measures into final design.	
4.3	Traffic and Road Safety.	To minimise accidents and incidents with	EBRD PR4, PR1.	MoT / Detailed Design Consultant.	In final design	Incorporation of recommended measures into final design.	

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	Include all accepted road safety recommendations from the EBRD road safety audit in the design – any deviations from these accepted recommendations must be agreed in advance with the Bank. Specific attention to be given to road safety recommendations for the central Tyup section.	road users and local communities, livestock.	ISO 39001				
4.4	Traffic and Road Safety. Develop and implement a program of road safety audits to assess safety performance along the alignment and access roads, and to identify any unsafe conditions. This should include: <ul style="list-style-type: none"> • An Independent Road Safety Audit on the detailed Design. • A Road Safety Audit at Pre-Opening • A Post Construction Road Safety Audit to confirm recommendations accepted during the design stage Road Safety Audit have been implemented. • A further Road Safety Audit should be undertaken 12 months post opening and then periodically every 3 years to assess road traffic collisions along the road and identify any trends/blackspots that require remedial actions. 	To minimise accidents and incidents with road users and local communities, livestock.	EBRD PR4, PR1. ISO 39001	MoT / PIU Consultant .	Detailed design Pre-opening/Post construction After 12 months of opening Every 3 years	Detailed design Road Safety Audit. Pre-opening Road Safety Audit. Post construction Road Safety Audits.	
4.5	Traffic and Road Safety. Develop detailed Traffic Management Plan in accordance with the updated ESIA/Project ESMP.	To minimise accidents and incidents with road users, local communities and livestock, and maintain local access.	EBRD PR4. Good international practice.	Construction Contractor.	Develop and approved prior to construction activities commencing. Implement during construction.	Detailed management plan/procedures approved by MoT / PIU Consultant and Construction Supervision Engineer. Progress report from Contractor during construction through monthly, quarterly and annual reporting to MoT / PIU Consultant and Construction Supervision Engineer.	
4.6	Occupational Health and Safety. Develop detailed OHS Plan in accordance with the updated ESIA/Project ESMP.	To ensure management of workforce in line with EBRD requirements.	EBRD PR2. EBRD PR4.	Construction Contractor.	Develop and approved prior to construction activities.	Detailed OHS Plan approved by MoT / PIU Consultant and Construction Supervision Engineer.	

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		To prevent OHS incidences.	Good international practice. EU OSH Framework.				
4.7	Occupational Health and Safety. Develop an OHS Plan for the O&M phase in accordance with the updated ESIA/ESMP.	To ensure management of workforce in line with EBRD requirements. To prevent OHS incidences.	EBRD PR2 EBRD PR4. Good international practice. EU OSH Framework.	MoT.	Developed prior to and maintained during operation.	Detailed O&M OHS Plan.	
4.8	Community Health and Safety. Develop and implement procedures to protect public health and safety within detailed Construction ESMP in accordance with the updated ESIA/ESMP. Public notice to be given of construction operations and programme. Public education/awareness raising sessions be held in high risk areas (i.e., construction near population centres, schools, etc.) and people (e.g., pastoralists, for example, encourage herders not to leave small livestock unattended) to make potentially affected people aware of the risks and controls in place.	To minimise accidents and incidents with road users, local communities and livestock.	EBRD PR4. Good international practice.	Construction Contractor.	Developed and approved prior to construction activities commencing. Implement during construction.	Detailed management plan/procedures approved by MoT / PIU Consultant and Construction Supervision Engineer. Progress report from Contractor during construction through monthly, quarterly and annual reporting to Construction Supervision Engineer.	
4.9	Exposure to Disease. Develop and implement procedures to control exposure to disease in accordance with the updated ESIA/Project ESMP; to include as a minimum: <ul style="list-style-type: none"> Disease control measures including COVID-19 procedure Construction workers' accommodation 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 	To minimise spread of diseases.	EBRD PR4. Good international practice.	Construction Contractor.	Developed and approved prior to construction activities commencing. Implement during construction.	Detailed management plan/procedures approved by MoT / PIU Consultant and Construction Supervision Engineer. Progress report from contractor during construction through monthly, quarterly and annual reporting to Construction Supervision Engineer.	

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4.10	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 ESMP, in accordance with the updated ESIA/Project ESMP. This plan should be developed and implemented in liaison with local community members, authorities and emergency services, and cover the requirements of this PR. This should be in place prior to construction commences on site.	Prepare for emergencies to minimise negative impacts.	EBRD PR4. Good international practice.	Construction Contractor.	Developed and approved prior to construction activities commencing. Implement during construction.	Detailed management plan/procedures approved by MoT / PIU Consultant and Construction Supervision Engineer. Progress report from contractor during construction through monthly, quarterly and annual reporting to Construction Supervision Engineer.	
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	Resettlement Action Plan (RAP) and/or Livelihoods Restoration Plan (LRP) Documentation. Following the confirmation of the detailed design, a detailed survey of all displacement (economic and physical) should be undertaken, covering census, assets and socio-economic survey, and develop a RAP/LRP as appropriate, in accordance with the LARF (and with the eligibility matrix in the LARF). Development of RAP/LRP report to record the above. Provide all information and evidence of agreements with affected parties. All compensation disbursed prior to start of works on site with affected asset in accordance with the RAP/LRP. Implement the Project SEP and a formal grievance mechanism, and continued consultation with people affected by land acquisition and / or livelihood impacts (temporary or permanent).	Ensure compliance with EBRD requirements.	EBRD PR5.	PIU Consultant Support of External consultants for surveys and RAP/LRP.	Prior to Right of Way clearance works that will affect asset identified. Prior to construction works that will affect asset identified. During RAP/LRP process.	RAP/LRP RAP/LRP provided to Bank for review and no objection approval. Signed agreements with affected parties. Project Land acquisition grievance mechanism and log.	
5.2	Monitoring. Monitoring of the RAP/LRP implementation and compensation activities to ensure compliance with EBRD PR5/LARF.	Ensure compliance with EBRD requirements.	EBRD PR5.	MoT / PIU Consultant / Construction Supervision Engineer.	After completion of land acquisition.	EBRD audit / monitoring report.	

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5.3	Construction Phase Land Acquisition Documentation and Implementation. Ensure all temporary land requirements (e.g. construction camps, borrow pits, haul roads, etc) that will result in temporary or permanent physical and/or economic displacement are secured in accordance with the LARF. Where appropriate and required, development and implementation of a RAP/LRP in accordance with the LARF. This should be undertaken in liaison with PIU. All compensation disbursed prior to start of works on site with affected asset.	Ensure compliance with EBRD requirements.	EBRD PR5	Construction Contractor.	Prior to construction works that will affect asset identified.	RAP/LRP. Disbursement of compensation. Grievance mechanism and log.	
5.4	Monitoring. Formal completion audit of Resettlement and Livelihood Restoration activities.	Ensure compliance with EBRD requirements.	EBRD PR5.	Independent Consultant.	After completion of land acquisition.	Completion Audit provided to Bank for review and no objection approval.	
PR6	Biodiversity and Living Natural Resources						
6.1	Conservation of Biodiversity. Road widening design should avoid areas where sensitive features, particularly quadrifolious tulip and <i>Astragalus projecturus</i> , are present where practicable (see Appendix 1); if possible the new sections of road should be constructed on the opposite side of the road to sensitive features. Maps are provided below this table.	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	MoT/ PIU Consultant. Detailed design consultant.	During detailed design.	Measures incorporated into detailed design.	
6.2	Conservation of Biodiversity. A detailed survey of quadrifolious tulip and <i>Astragalus projecturus</i> within the footprint of the final detailed Project design plus a buffer of 200 m (to allow for effects of habitat degradation) should be undertaken by a trained ecologist specialist post-detailed design and where necessary, further mitigation measures identified to avoid direct loss wherever possible. Method statements, including the need for translocation, to be added to the Biodiversity Management Plan as required.	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	MoT/ PIU Consultant. Support of Biodiversity Consultant.	Prior to construction activities commencing.	Survey completed and design measures incorporated / updated as necessary. Updated Biodiversity Management Plan.	

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6.3	<p>Conservation of Biodiversity.</p> <p>Undertake pre-construction clearance and preparation of a report. This should cover:</p> <p>Where necessary (i.e. as identified from the above surveys in #6.2), transplantation of quadrifolious tulip bulbs in the spring-summer period to areas of suitable retained habitat.</p> <p>Transplantation method statement and biodiversity action plan to be drawn up by a botany specialist.</p> <p>Any clearance of low vegetation in sensitive areas within the footprint should be undertaken in two stages (a high cut, a short period to allow reptiles, amphibians and small mammals to disperse followed by a lower cut) where possible.</p> <p>Vegetation cleared outside of the breeding bird season (generally April to August) where practicable. If this is not possible, a pre-clearance walkover will be completed by a suitably qualified ecologist to check for the presence of active bird nests, including the rookery present in the roadside plantation woodland. Should any active nests be identified, it is recommended that these are excluded from works until such time that the chicks have fledged the nest.</p>	Biodiversity protection. Compliance with EBRD requirements and EU Birds Directive.	EBRD PR1, PR6. EU Birds Directive. International Best Practice.	Construction Contractor.	Prior to removal of trees.	<p>Pre-construction report covering:</p> <ul style="list-style-type: none"> • Translocation, as relevant • Clearance of vegetation in sensitive areas • Breeding bird vegetation clearance 	
6.4	<p>Conservation of Biodiversity.</p> <p>Construction works to be undertaken in accordance with the measures set out in the Project ESMP/Biodiversity Management Plan.</p> <p>Ensure measures are taken to prevent spread of invasive plant species. This includes pre-construction checks to determine the location of invasive species within the works areas, avoiding site clearance in, and movement of soils from areas containing invasive species and appropriate treatment of individuals plants where applicable.</p>	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	Construction Contractor.	During construction.	<p>Pre-construction checks.</p> <p>Method Statements.</p> <p>Updated Biodiversity Management Plan.</p> <p>Inspection records.</p>	
6.5	<p>Conservation of Biodiversity.</p> <p>Replant trees along the new road, at a safe distance in accordance with GIP. Proposed</p>	Biodiversity protection. Compliance with EBRD requirements.	EBRD PR1, PR6. International Best Practice.	Construction Contractor.	Post-construction and prior to handover.	<p>Rehabilitation report.</p> <p>Trees planted.</p>	

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	species include <i>Armeniaca vulgaris</i> for the first rows and taller species <i>Betula pendula</i> , <i>Salix babylonica</i> for the third and fourth rows, where relevant.						
PR7	Indigenous People						
7.1	Not applicable.						
PR8	Cultural Heritage						
8.1	<p>Assessment of Impacts on Cultural Heritage. Road widening detailed design should avoid areas with sensitive features:</p> <ul style="list-style-type: none"> Balbay-Baatyr monument Monument "Teke Baatyr" Orthodox Church - Temple in honor of the Kazan icon of the Mother of God (Tup) Graves in the village Tepke Graves in the village Zhany-Aryk Cemetery site south-west of Zhany-Aryk Village Sacred sites around Ysyk- Kol Biosphere Reserve <p>Access to the monument "Teke Baatyr" may also be affected and a new parking area / access route should be included as an improvement measure in the detailed design so that people can still visit the monument.</p>	<p>Preserve sites of cultural significance. Respecting traditions and customs. Compliance with EBRD requirements and local requirements.</p>	<p>EBRD PR1, PR6. Local requirements. International Best Practice.</p>	<p>MoT. Detailed design consultant</p>	<p>During detailed design.</p>	<p>Measures incorporated into detailed design.</p>	
8.2	<p>Management of Impacts on Cultural Heritage. Prepare and implement Cultural heritage management plan and chance finds procedure as part of detailed Construction ESMP. Conduct training on chance finds procedure. If any archaeological remains associated with the Chang'an-Tianshan Silk Route WHS are present, the Ministry of Culture would need to be informed as well as the UNESCO representative. Depending on the sensitivity and extend of archaeology</p>	<p>Preserve sites of cultural significance. Respecting traditions and customs. Compliance with EBRD requirements and local requirements.</p>	<p>EBRD PR1, PR8. International Best Practice.</p>	<p>Construction Contractor.</p>	<p>Prior to construction activities commencing. Implement during construction.</p>	<p>Cultural heritage management plan and chance finds procedure in the Construction ESMP. Progress report from contractor during construction through monthly, quarterly and annual reporting to MoT / PIU Consultant. And Construction Supervision Engineer.</p>	

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	<p>exposed, it may be proposed that the road improvements avoid the area of archaeological interest due to its international significance.</p> <p>If any archaeological remains associated with the Chang'an-Tianshan Silk Route WHS are present, they would require careful and professional archaeological excavation and the engagement of UNESCO in the management of any finds / information recovered. This would require appropriate licences to undertake the work and an approved archaeological investigation strategy by the authorities and UNESCO representatives.</p>					Cultural heritage report for any change finds.	
8.3	<p>Management of Impacts on Cultural Heritage.</p> <p>The following sites should be screened from construction works and compounds with appropriate fencing (see Appendix 1). Access should also remain unaffected and open so visitors can still go to see it during construction wherever feasible (where not feasible, advance warning should be provided to users):</p> <ul style="list-style-type: none"> • Balbay-Baatyr monument • Monument "Teke Baatyr" • Orthodox Church - Temple in honor of the Kazan icon of the Mother of God (Tup) • Graves in the village Tepke • Graves in the village Zhany-Aryk • Cemetery site south-west of Zhany-Aryk Village 	<p>Preserve sites of cultural significance.</p> <p>Respecting traditions and customs.</p> <p>Compliance with Kyrgyz law.</p>	<p>EBRD PR1, PR8.</p> <p>Kyrgyz law.</p> <p>International Best Practice.</p>	Construction Contractor.	During construction	Inspection Report.	
PR10	Information Disclosure and Stakeholder Engagement						
10.1	<p>Construction Phase SEP and Grievance Mechanism.</p> <p>Building on the existing Project SEP, develop and implement detailed Construction SEP for approval by MoT / Construction Supervision Engineer.</p> <p>Community liaison officer (CLO) or equivalent to be appointed by Construction Contractor.</p>	Compliance with EBRD requirements.	EBRD PR1, PR10.	Construction Contractor.	<p>Develop prior to construction on site.</p> <p>Implement during construction.</p>	<p>Construction SEP approved by MoT / PIU Consultant and Construction Supervision Engineer.</p> <p>Contractor community liaison officer to be appointed.</p> <p>Grievance mechanism log and records.</p>	

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	<p>Ensure early notice to villages and residents prior to major project activities that could affect them.</p> <p>Undertake public education/awareness raising sessions in high risk areas (i.e. construction near population centres, schools, etc.) and with high risk groups (e.g. herders, for example, encourage herders not to leave small livestock unattended).</p> <p>Grievance mechanism log and reporting.</p>						
10.2	<p>Operation Phase SEP and Operational Grievance Mechanism.</p> <p>Develop and implement O&M stage SEP.</p>	Compliance with EBRD requirements.	EBRD PR1, PR10.	MoT.	Implement during construction.	O&M SEP	

Appendix 1. Sensitive Sites









