

**KAZAKHSTAN  
GRCF2 W2 E2 – EAST KZ MUNICIPAL STREET  
LIGHTING MODERNISATION - PHASE 2  
PROJECT PREPARATION**

**Project ID: 53777**

**Environmental and Social  
Action Plan (ESAP)**

*Submitted by*

**energy centre**  
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*Prepared for:*

 **European Bank**  
for Reconstruction and Development

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Item	Action	Environmental & Social Risks (Liability/ Benefits)	Legislative requirement/Best practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria For Successful Implementation
<b>1</b>	<b>ENVIRONMENTAL - Environmental Management System</b>					
1.1 Environmental and Social Management System	Company and Sub-contractors shall develop a basic ESMS.	Lack of ESMS may lead to work-place accidents and incidents and regulatory non-compliance.	EBRD PR 1  Best practice	Company resources to develop ESMS  Sub-contractors own resources or external consultants to develop ESMS.	ESMS prepared before the commencement of Project operational phase (both Company and Sub-contractors).	Company to have ESMS in place prior to the start of the Project.  Annual review of Sub-contractors ESMS by the Company's EHS Manager.
1.2 Environmental and Social Policy	Company and Sub-contractors shall develop an environmental policy as part of their ESMS.	A policy will help define the environmental and social objectives of the Company and Sub-contractors	EBRD PR 1  Best practice	Own resources	As per the ESMS timetable above	Development of the environmental and social policy and communication of policy across the company to all Company and Sub-contractor staff.
1.3 Environmental and Social Management Plan	Company to include in the tender documents relevant sub-contractor screening requirements ensuring sub-contractors possess Environmental and Social (E&S) credentials & have the capacity to manage E&S risks to comply with E&S contractual requirements.  Company to include in all contracts with Sub-	Risk that ESAP measures will also not be implemented if there is not a clear process for implementation.	EBRD PR 1  Best practice	Own resources	Throughout project operational phase (both Company and Sub-contractors).	Annual monitoring and reporting to EBRD by the Company on the compliance status of the ESAP.

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	contractors relevant requirements ensuring the ESAP requirements are binding on the subcontractors.					
1.4 Organisational Capacity and Commitment	<p>Company to hire an environmental, health and safety (EHS) manager to monitor Sub-contractors performance, report to EBRD and maintain ESMS.</p> <p>Sub-contractors to hire EHS Managers to implement the ESAP and ESMS (potentially a part time position)</p>	Lack of oversight of EHS issues leading to accidents and environmental incidents.	EBRD PR 1 Best practice	Company and Sub-contractor own resources	By April 2023	Company and Sub-contractors hired EHS Manager
1.5 Project Monitoring and Reporting	Company to undertake project monitoring and reporting.	Lack of reporting will mean that issues may remain hidden from senior management or unresolved.	Best Practice	Company own resources	End of 2024	Report at a minimum annually on all Company activities with respect to environmental and social compliance. Site visits to monitor construction sites should be carried out for all major construction works to ensure no impacts are occurring from the activities.

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<b>2</b>	<b>Labour and Working Conditions</b>					
2.1 Human Resource Policies and Working Relationships	As part of bidding procedures, the Company shall include clauses in Sub-contractors contracts to ensure that all sub-contractors have suitable human resource policies and general HR procedures in line with the Labour Code.	Workers will be unaware of their rights if no HR policies are in place.	EBRD PR 2 Best Practice Labour Code	Company own resources	Sub-contractor contract preparation and negotiation phase.	Annual review of sub-contractors HR policies / activities by the Company.
2.2 Non-Discrimination and Equal Opportunity	As part of bidding procedures, the Company shall include clauses in Sub-contractors contracts to ensure that all sub-contractors staff are not discriminated against in the field of employment based on certain characteristics, such as race, gender or disability.	Potential discrimination against workers based on race, gender and disabilities.	EBRD PR 2 Best Practice Labour Code  ILO conventions No. 100, 111, 156, 141.	Company own resources	Sub-contractor contract preparation and negotiation phase.	Annual review of sub-contractors HR policies / activities by the Company.
2.3 Workers Organizations	As part of bidding procedures, the Company shall include clauses in Sub-contractors contracts to ensure that all sub-contractors staff are not discouraged from joining workers organizations.	Workers organisations will help prevent issues such as discrimination, etc.	EBRD PR 2 Best Practice Labour Code	Company own resources	Sub-contractor contract preparation and negotiation phase.	Annual review of sub-contractors HR policies / activities by the Company.

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2.4 Wages	As part of bidding procedures, the Company shall include clauses in Sub-contractors contracts to ensure that all sub-contractors staff wages be at least comparable to those offered by equivalent employers.		EBRD PR 2 Best Practice Labour Code	Company own resources	Sub-contractor contract preparation and negotiation phase.	Annual review of sub-contractors HR policies / activities by the Company.
2.5 Worker Grievance Mechanism	As part of bidding procedures, the Company shall include clauses in Sub-contractors contracts to ensure that all sub-contractors have an effective grievance mechanism for its workers.	An established GM will allow workers to actively communicate their problems with management in a formal manner.	EBRD PR 2 Best Practice Labour Code	Company own resources	Sub-contractor contract preparation and negotiation phase.	Annual review of sub-contractors Grievance Mechanism and complaints by the Company.
<b>3</b>	<b>Resource Efficiency and Pollution Prevention and Control</b>					
3.1 Resource Efficiency	The Project will result in significant energy savings, thereby reducing resource requirements as compared to the baseline scenario greenfield project. However, it is also recommended that the Company advocates before the city to adopt a program to dim lights during off-peak hours for	Dimming lights will result in additional energy savings.	EBRD PR 3 Best Practice Law on Energy Efficiency	Company to prepare annual energy Audit.  Company to adopt program of light dimming.	Design Phase.	Post-commissioning verification of energy consumption relative to the pre-project assumptions / estimates.

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	further reduction of energy consumption.					
3.2 Wastes, Hazardous Substances and Materials	Company to ensure the waste management regulations are adhered to.	Improper disposal of construction waste could lead to pollution incidents and complaints.	EBRD PR 3 Best Practice Environmental Code	Company own resources	Throughout Project implementation	Bi-monthly inspections of construction sites during the construction phase.
<b>4</b>	<b>Health and Safety</b>					
4.1 Occupational Health and Safety	<p>Sub-contractors to prepare OHS Plans outlining national OHS requirements, relevant IFC EHS Guidelines and procedures for working with electrical hazards and working at heights, etc.</p> <p>Sub-contractors to provide regular OHS training to staff.</p> <p>Sub-contractors to keep records of any accidents occurring during Project works.</p>	Lack of awareness of OHS issues through inadequate planning and training could lead to accidents involving workers and members of the community.	EBRD PR 4 Labour Code IFC EHS Guidelines	<p>Sub-contractors to Prepare OHS plans and OHS training programs from their own resources.</p> <p>Sub-contractors to provide PPE for workers.</p>	<p>OHS Plan Completed prior to the start of operational activities.</p> <p>Training provided on a monthly basis.</p> <p>Record keeping throughout the contractual period.</p> <p>All Sub-contractor workers to have adequate PPE throughout the contractual period.</p>	<p>Sub-contractors OHS Plan developed prior to the start of contract.</p> <p>Zero accidents to Sub-contractors workers during any contractual calendar year as a result of Project works.</p> <p>Company inspections of Sub-contractors work sites on a monthly basis to assess the application of PPE and compliance with national OHS standards and IFC guidelines.</p>

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	Sub-contractors t ensure that adequate PPE is provided to workers as required by national law and Table 14 of the ESDD Report.					
4.2 Traffic and Road Safety	<p>All Sub-contractors must have standard operating procedures for traffic and road safety.</p> <p>Sub-contractor workers shall receive routine training on the SOP.</p> <p>Routine inspection of sub-contractors works sites by the Company.</p>	Without SOPs for traffic and road safety accidents could occur to workers and members of the community.	<p>EBRD PR 4</p> <p>Labour Code</p> <p>IFC EHS Guidelines</p>	Sub-contractors to Prepare SOP and provide training programs from their own resources.	<p>OHS Plan Completed prior to the start of operational activities.</p> <p>Training provided on a monthly basis.</p>	<p>Sub-contractors to develop SOPs for road safety.</p> <p>Zero accidents to Sub-contractors workers during any contractual calendar year as a result of Project works.</p>
4.3 Community Health and Safety	<p>During the design phase of the Project the Company shall ensure street lights are designed to limit the impact of light clutter and skyglow.</p> <p>The design and location of lighting installations will need to be communicated to local communities and other stakeholders and any feedback from women and other vulnerable groups related to safety</p>	Potential impacts to the health of people living in areas close to the street lighting.	<p>EBRD PR 4</p> <p>Best Practice</p>	None, all measures can be adopted during the design phase of the Project.	To be considered during the design phase of the Project.	<p>Zero complaints from the community during the operational phase of the Project.</p> <p>Improved safety and security.</p> <p>Inclusive consideration of stakeholders' needs.</p>

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	<p>and security will be taken into consideration.</p> <p>The Company shall minimize and control blue-rich environmental lighting by using the lowest emission of blue light possible to reduce glare.</p> <p>The Company shall introduce effective cut-off designs of LED lights into the tender documents.</p>					
<b>10</b>	<b>Information Disclosure and Stakeholder Engagement</b>					
10.1 Stakeholder Engagement Plan	Company to develop, implement and keep updating the project specific Stakeholder Engagement Plan (SEP)	Lack of formal SEP may put the Company at risk of not properly notifying the public of works in their communities, leaving the Company vulnerable to repercussions from regulatory authorities.	EBRD PR 10 Best Practice	Company's own resources	Prior to the start of Operational activities	<p>SEP developed as part of this Project assessment. Implementation of SEP by relevant departments within the Company.</p> <p>Number of engagement and consultations with affected stakeholders to be reported to the Bank during annual reporting.</p>
10.2	Company to develop project-specific external Grievance Mechanism for	This is a risk to stakeholders as there is no official recourse	EBRD PR 10 Best Practice	Company's own resources	Prior to the start of Operational activities	Stakeholder Engagement Plan containing clearly defined Grievance

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Operational Grievance Mechanism	local communities and other stakeholders.	mechanism to voice concerns.				<p>Mechanism for Stakeholders developed and implemented.</p> <p>Number and status of external grievances and complaints to be reported to the Bank during annual reporting.</p>