# Appendix A – Management of Change Procedure

**Introduction**

This Management of Change Procedure (MCP) sets out how the potential ESHS implications of design changes would be assessed. The assessment of the design change would aim to ensure that adequate mitigation is adopted to minimise and avoid effects where any deviations to the Project, as described in the ESIA, are proposed. This procedure also covers associated infrastructure not defined which could be located beyond the Project area. Such infrastructure could include the following: access roads, construction compounds, workers accommodation, waste management facilities and changes to the public highway or accesses.

This MCP should be read in conjunction with the Environmental and Social Management Plan (ESMP) for the Project, where the roles and responsibilities of State Regulatory Institution (SRI), the Project Implementation Unit (PIU), the Supervision Engineer, and the Contractor are set out in Section 3. Contractors will prepare their own management of change procedure in compliance with this procedure and give required training to its staff.

Potential changes can be triggered at either the design stage, or prior to and during construction, and can be initiated by various stakeholders (SRI, PIU, Supervision Engineer, Lenders, Community or the Contractor). The changes by Contractors or the PIU could be prompted by the application of the environmental and social design principles that are set out in the ESMP. They could include:

- Basic design refinement, after disclosure of the ESIA, due to detailed topographic or geotechnical information, or Lenders' requirements;
- Detailed design development submitted by the design team of the Contractor in advance of the construction activities and approved by SRI/PIU;
- Results of further field surveys, investigations, and monitoring;
- Identification of additional areas required for Project construction which are not included in the ESIA.
- Comments or concerns submitted by stakeholders, including the public;
- Changes in regulations or comments by regulatory bodies; and
- Unexpected Issues arising during construction.

The Contractor would define the technical changes to the design that are proposed and determine the need to conduct ESHS studies to inform the potential implications of changes to the design. The MCP recognises that there could be differing degrees of change, and the need and scope of environmental and social investigation would need to be appropriate for the proposed change.

Consequently, three categories of change have been developed, which comprise:

*CATEGORY 1*

A Project design or activity change that does not result in any changes to, or impacts on, communities or the natural environment, and does not cause non-compliance with respect to national legislation and project requirements as a result of the design change. Any potential impacts would be routinely controlled through the existing measures outlined in the ESMP.

Subject to technical evaluation, the change can be accepted without the need for further ESHS studies.

Management of change process form in Annex-1 will be filled and submitted to Supervision Engineer for review and approval and submitted to the PIU for information.

*CATEGORY 2*

A Project design or activity change that could lead to ESHS changes, but which are unlikely to result in significant effects. Such effects may or may not have been covered by the ESIA or by mitigation measures outlined in the ESMP. These design changes would not be in sensitive locations (i.e. within an IBA or within proximity of settlements (within 150m)) and are unlikely to result in potential non-compliance with Project ESHS requirements. However, an ESHS study would be required to demonstrate the potential impacts of the change and to confirm that measures are either already in place in the ESMP, can be controlled by good international practice or measures can be extended or introduced to fully control and/or mitigate the potential impacts. The PIU would undertake a review and approve the scope and outcome of these Category 2 ESHS studies prior to any design changes being implemented. This change will come through either the Contractor or Supervision Engineer, in accordance with the above listed change principles, and the Management of Change Process Form given in the Annex-1 will be prepared including the ESHS studies and submitted for the approval of PIU.

*CATEGORY 3*

This applies to a project design or activity change that could result in potentially significant effect, that was not included in the ESIA and is not covered by the ESMP. A Category 3 change would also apply to any changes outside the ESIA study area, within an IBA, or within proximity of settlements (within 150m). Category 3 changes will require approval of both the scope and outcome of ESHS studies from both SRI/PIU and the Lenders. These ESHS studies will need to demonstrate compliance with the Project ESHS requirements. In some circumstances, the assessment may need to be undertaken in consultation with stakeholders and communities and may require full public disclosure, prior to confirmation of no objection by the Lenders, and will likely lead to changes to the Contractors ESMP. This change will come through either the Contractor or Supervision Engineer in accordance with the above listed change principles, the Management of Change Process Form given in the Annex-1 will be prepared including the ESHS studies/assessments and submitted the PIU for approval and submitted to the Lenders for confirmation that they have no objection. Work can progress once both approval from the PIU and no objection from the Lenders is received.

**Procedure**

The general MCP procedure is described in the following eight steps:

Note – in case the change is initiated by SRI, PIU will undertake the below steps preparing the screening and supplementary documentation and undertaking any disclosure and stakeholder engagement required

*Step 1 - Notification of Design Change and Screening by Contractor*

The Contractor will notify the Supervision Engineer of the need to change the design or clarify the details of associated infrastructure being developed outside of the Project area. In doing so, the Contractor will present details of the proposed change, the justification for the

change, any alternatives considered and indicate their preliminary evaluation of the ESHS category of the change.

The Supervision Engineer shall review and approve the Annex-1 screening conducted by the Contractor to provide a preliminary opinion for proposed design changes in order to evaluate the ESHS categorisation of the design change.

The Supervision Engineer shall register and track all proposed changes to the design (irrespective of the entity who initiates the change), or the design of associated infrastructure that fall outside the Project area, in an MCP log, for periodic review by PIU/the Lenders. The MCP log shall be used to document all design change decisions.

*Step 2 – Screening Review by Supervision Engineer*

The Supervision Engineer shall then examine the Management of Change Process Form and documentation provided by the Contractor (e.g. drawings, technical notes, or Feasibility Studies) for all Category 2 and 3 design changes to understand the features and location of the proposed change to confirm the categorisation of the proposed design change. If the Supervision Engineer agrees to the change being a Category 1 change, it will inform the Contractor, and no further work is necessary. PIU will be informed about all category changes in the monthly reports. For all Category 2 and 3 changes, the Supervision Engineer will inform the Contractor of the need to provide a scope of works in line with Step 3 below.

In addition, for each Category 2 and 3 design change, the Supervision Engineer shall assess and monitor whether the Contractor has evaluated a sufficient number of alternative designs and selected the most appropriate option considering inter alia the potential ESHS impacts.

*Step 3 - Scoping of Environmental, Health and Safety and Social Studies (ESHS) for Category 2 and 3 Changes*

The Contractor is responsible for the procurement and funding of the ESHS study necessary for Category 2 and 3 design changes (unless they are proposed by SRI / PIU). The Contractor shall establish:

- the scope and level of detail of the necessary ESHS Study;
- the scope of any necessary site surveys; and
- the technical studies, assessments and reporting formats needed.

The proposed scope of the ESHS study will be based on the methods used in the Project ESIA, where applicable. The PIU shall coordinate with the Contractor and Supervision Engineer to ensure that these needs are addressed. The PIU would approve the scope of an ESHS study for a Category 2 change via the review and monitoring undertaken by the Supervision Engineer.
For Category 3 changes, the Supervision Engineer will review, monitor and inform PIU and PIU shall report to the Lenders to inform them of: the proposed change; the result of the ESHS screening; and to gain approval for the proposed scope of the ESHS study. The ESHS study proposed by the Contractor must comply with the Project ESHS requirements. The Lenders must approve the scope of all Category 3 ESHS studies. At this scoping stage for Category 3 changes, the need for stakeholder engagement and public disclose of the final ESHS study is also to be determined by the PIU and approved by the Lenders.

The Supervision Engineer shall review the Contractors proposals with respect to the:

- Scope and level of detail of the necessary ESHS Study;

- Scope of the site surveys;
- Technical studies, assessments and reporting formats; and
- Proposals for stakeholder consultation and public disclosure (where relevant).

The PIU shall review the proposed scope of ESHS work based on the recommendation from the Supervision Engineer to ensure it is compliant with the Project ESHS requirements. For Category 3 changes, the PIU shall report to the Lenders the proposed design changes, the result of the ESHS screening as per Annex-1 Management of Change Process Form (MCPF), the proposed scope of the ESHS study and the strategy for stakeholder consultation.

PIU shall inform the Contractor of the outcome of this review.

### *Step 4 – Environmental, Health and Safety, and Social Studies for Category 2 and 3*

The Contractor procures, funds, and undertakes the approved ESHS study for design changes proposed by the Contractor. SRI would fund the ESHS study if the changes are proposed by SRI/PIU.

For Category 3 changes, the Contractor undertakes the agreed stakeholder consultation. The Supervision Engineer monitors the stakeholder consultation process and the ESHS study.

Where public disclosure and consultation of the ESHS study is needed, PIU shall support the Contractor with any public disclosure and consultation requirements of any ESHS studies by organising any public meetings and posting details of the disclosure on the Project website. Public disclosure and consultation only occurs after Step 5 which is the review and approval of the ESHS study. Feedback from disclosure and consultation shall be accounted for in the final design of the change.

### *Step 5 - Review and Approval*

For Category 2 design changes, the ESHS study report(s) shall be submitted for the approval or rejection of the PIU only. For Category 3 changes the PIU shall provide the ESHS study report(s) for the Lender's review and approval. The Lender's must approve all Category 3 design changes.

The review and approval of Category 3 changes must demonstrate compliance with the Project ESHS requirements. The Supervision Engineer will review, monitor the ESHS studies carried out by the Contractor and give feedback to the PIU.

The PIU shall inform the Contractor about the final outcome of the review of the design changes and the results of any ESHS study reviews making clear the details of any additional work needed to the ESHS studies. Changes and updates will be made to the ESMP, or CESMP if appropriate, as required for both Category 2 and 3 changes – see Step 7.

The Supervision Engineer shall review the Category 2 and 3 ESHS study report(s) provided by the Contractor and verify the following for the final approval of PIU;

- Robustness of the baseline description;
- Relevance and adequacy of the impact assessment;
- Effectiveness of the proposed mitigation strategy; and
- Identification of any changes to the ESMP.

Once any Category 3 ESHS studies are finalised and approved, the PIU shall support the Contractor with any public disclosure requirements of any ESHS studies by organising any public meetings and posting details of the disclosure on the Project website.

### *Step 6 - Local EIA and Permits*

The Supervision Engineer shall, for all approved design changes, carry out a review of existing permits to determine whether these could be affected and whether revisions to the national EIA are required. Supervision Engineer would be responsible for notifying the appropriate regulators of all material design changes where these could affect the terms of permits already issued, and the preparation of any revised permit applications or revisions to the national EIA. The Contractor will then be responsible for implementing and complying with the requirements of the local permits.

### *Step 7 - Addenda to ESMP*

If an approved design change requires environmental and social measures which are not covered by the existing ESMP, the Contractor shall prepare an addendum to the ESMP, or CESMP if appropriate, and specific management plans to address any new mitigation measures. The addenda, together with the document it is an addenda to, shall be submitted to the Lenders and disclosed on the Project website.

### *Step 8 - Addenda to Resettlement Action Plans*

For each approved design change, the PIU shall conduct the land surveys required and the necessary consultations to update the Resettlement Action Plans (RAP) for the area affected by the proposed change in design. The PIU shall use the result of the RAP investigations to minimise impacts on livelihoods and implement the required actions with the Contractor.

The PIU shall submit the addenda to the RAP to the Lenders before payment of compensation and actual land take. The RAP shall be disclosed on the Project website and compensations paid in order that the land take can be formalised.

# Annex-1

| MANAGEMENT OF CHANGE PROCESS FORM | |
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| **Section A. This section of the form will be filled out by the Facilitator of the Change** | |
| **Facilitator of the Proposed Change (s):** | |
| **Date:** | |
| **Location of the proposed Change(s):** | |
| **References to Relevant Design Documentation/ Drawings:** | |
| **Summary of the Proposed Change (s):** | |
| **Please specify the change content:** | **Route/site facility change**<br>**Engineering/Design Development**<br>**Change in Legislation**<br>**Change in Authority Decision**<br>**Change in new E&S data including community safety**<br>**Change of Construction/Operation Execution strategy**<br>**Change of Management Strategy**<br>**Stakeholder influence** |
| **ROUTE/SITE FACILITY CHANGE** | |
| **Please provide details of the route/site facility change**<br>***Note: Please refer to the ESIA Report and E&S documentation of the Project and if the change is Category 2 or 3, then prepare a detailed ESHS study and submit to the approval of SRI/PIU and the Lenders.*** | |
| **ENGINEERING/DESIGN DEVELOPMENT CHANGE** | **Please specify the new E&S aspects with the below given questions?** |
| **ATMOSPHERIC EMISSIONS** | |
| **Will there be any associated atmospheric emissions?**<br>**If so, which contaminants will be emitted?**<br>**What volumes or concentrations of these contaminants will be emitted?** | |

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| **How will these contaminants be managed to reduce the environmental impact?** | |
| **How will the emission of these contaminants affect SRI's compliance with national and/or international legislation and policy commitments?** | |
| **WASTEWATER DISCHARGES** | |
| **Will there be any associated wastewater discharges?**<br>**If so, what contaminants will be discharged?**<br>**What volumes or concentrations of these contaminants will be discharged?** | |
| **How will this affect SRI's compliance with national/ international legislation and policy commitments?** | |
| **WASTE GENERATION** | |
| **Will any wastes be generated? If so, what types of waste will be generated? What quantities of these wastes will be generated?** | |
| **How will these wastes be managed and finally disposed?** | |
| **NOISE** | |
| **Will the proposed change be expected to create any additional noise impact? If so, what will be the level of this additional noise?** | |

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| **How will the noise impact be mitigated if it is likely to exceed Project Standards?** | |
| **SOIL** | |
| **Will the proposed change be expected to create any additional impact to soil? If so, what will be the level of this additional impact?** | |
| **How will the soil impact be mitigated if it is likely to exceed Project Standards?** | |
| **ENVIRONMENTAL AND CULTURALLY SENSITIVE AREAS** | |
| **Is a critical habitat (CH) or archaeological site (ARC) identified within the vicinity of the proposed change?** | |
| **If yes, has a specialist desktop (ecological or archaeological) review been completed to identify risks to the CH?** | |

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| **If yes, will the proposed change create any impact on environmental sensitive areas? If so, what are those areas and what recommendations will be required?** | |
| **How will the impact on these areas be mitigated?**<br>**As per national or international standards?** | |
| **USE OF NATURAL RESOURCES** | |
| **Will the proposed change create any increase in energy, water, raw material, fuel consumptions or additional land use? If so, what type and amount of increase is expected?** | |
| **Will there be any additional permit/legal requirements?** | |
| **ENVIRONMENTAL MONITORING** | |
| **Will there be any environmental monitoring/reporting requirements?** | |
| **If so, what will be these monitoring/reporting requirements and how will they be conducted?** | |

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| **How often will these monitoring/reporting requirements need to be conducted?** | |
| **MAINTENANCE** | |
| **Will any air emissions, wastewater discharges or wastes be generated during maintenance activities associated with the proposed change?** | |
| **If so, what contaminants will be generated? What quantities of these contaminants will be generated?** | |
| **How will these contaminants be managed to reduce the environmental impact? Are these**<br>**management strategies in line with the existing national and international requirements?** | |
| **HAZARDOUS MATERIALS** | |
| **Will any new hazardous materials be used? If so, what types and quantities will be used? Does the MSDS of the new hazardous material fit for the legal requirements?** | |
| **How will these materials be stored and handled?** | |

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| **Have Material Safety Data Sheets (MSDSs) been obtained, retained and communicated to all relevant personnel?** | |
| **How will these contaminants be managed to reduce the environmental impact?** | |
| **SENSITIVE RECEPTORS** | |
| **Will there be any additional or new sensitive receptors in the vicinity?** | |
| **POLITICS AND GOVERNANCE** | |
| **Will any additional or new authority approval or permit be required?** | |
| **SETTLEMENT PROFILE** | |
| **Are any settlements or houses nearby?** | |
| **INFRASTRUCTURE FACILITIES** | |

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| **Will any additional or new infrastructure be crossed (roads, etc.)?** | |
| **TRANSPORTATION AND TRAFFIC** | |
| **Will there be any additional or new impact on existing, local traffic?** | |
| **ECONOMIC CONDITIONS** | |
| **Will economic conditions of the area be affected?** | |
| **LAND** | |
| **Will additional or new land be required?** | |
| **LAND USE** | |
| **If additional or new land is required, is it used as agricultural, pasture or forest?** | |
| **EMPLOYMENT AND LIVELIHOODS** | |
| **Will there be positive effects in terms of employment or procurement?** | |
| **CHANGE IN LEGISLATION** | **Please specify the change details.** |
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| **CHANGE IN AUTHORITY PROVISION** | **Please specify the change details.** |
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| **CHANGE IN NEW E&S DATA** | **Please specify the change details.** |
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| **CHANGE OF CONSTRUCTION/OPERATION EXECUTION STRATEGY** | **Please specify the change details.** |
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| **CHANGE OF MANAGEMENT STRATEGY** | |
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| **STAKEHOLDER INFLUENCE** | |
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| **Section B. This part will be filled by following disciplines for specific evaluation of MCP data** | |
| **COMMENTS OF SPECIALISTS** | |
| **Environmental Discipline** | |
| **Social Discipline** | |
| **HS and Railway Safety Discipline** | |
| **Land & Permits Discipline** | |
| **Project Manager** | |

| Please state the final decision and category of the change based on the below headings:<br>☐ Category 1<br>☐ Category 2<br>☐ Category 3 |
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| ☐ No action is required. Change can be implemented. |
| ☐ Additional permit is required. |
| ☐ Environmental and Social Assessment is required. |
| ☐ Public Consultation is required. |
| ☐ Project Description File is required by State Authorities. |
| ☐ EIA/ESIA Process is required by State Authorities and Lenders. |
| ☐ Change can be implemented provided that: |

*Note: After filling-out the form, please hand over the EMCP data to the Facilitator of the Change for the given decision to be communicated with the related stakeholders, in order to proceed to the approval/no objection.*