

Sainshand – Tsagaan Suvarga Transmission Line Project

Environmental and Social Impact Assessment
Non-Technical Summary



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Abbreviations

Abbreviation	Definition
CES	Central Energy System
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CMS	Conservation of Migratory species
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
EU	European Union
HR	Human Resources
IUCN	International Union for Conservation of Nature
km	Kilometre
kV	Kilovolt
LARF	Land Acquisition and Resettlement Plan
MNS	Mongolian National Standard
NPTG	National Power Transmission Grid
NTS	Non-Technical Summary
PPE	Personal Protective Equipment
SEP	Stakeholder Engagement Plan
UNESCO	United Nations Education, Scientific and Cultural Organisation

1 Introduction

1.1 Background

The European Bank for Reconstruction and Development (EBRD) is considering providing finance to the Government of Mongolia for the construction of a 204 kilometre (km) double circuit 220 kilovolt (kV) overhead transmission line in Dornogovi aimag (province), in the Gobi Region. The route alignment will commence with a connection to a planned substation in Sainshand (to be constructed as part of the EBRD-funded Choir–Sainshand transmission line project that is currently in the pre-construction phase) and end with a connection to an existing 220/35/22kV substation operated by the National Power Transmission Grid (NPTG), a state-owned power transmission utility, located within a licensed mine area at the Tsagaan Suvarga mine. The 204km overhead transmission line and substation connections are herein referred to as ‘the Project’. The Ministry of Energy (MoE) will be the Client and the NPTG will operate the Project. The site location is shown in **Figure 1**.

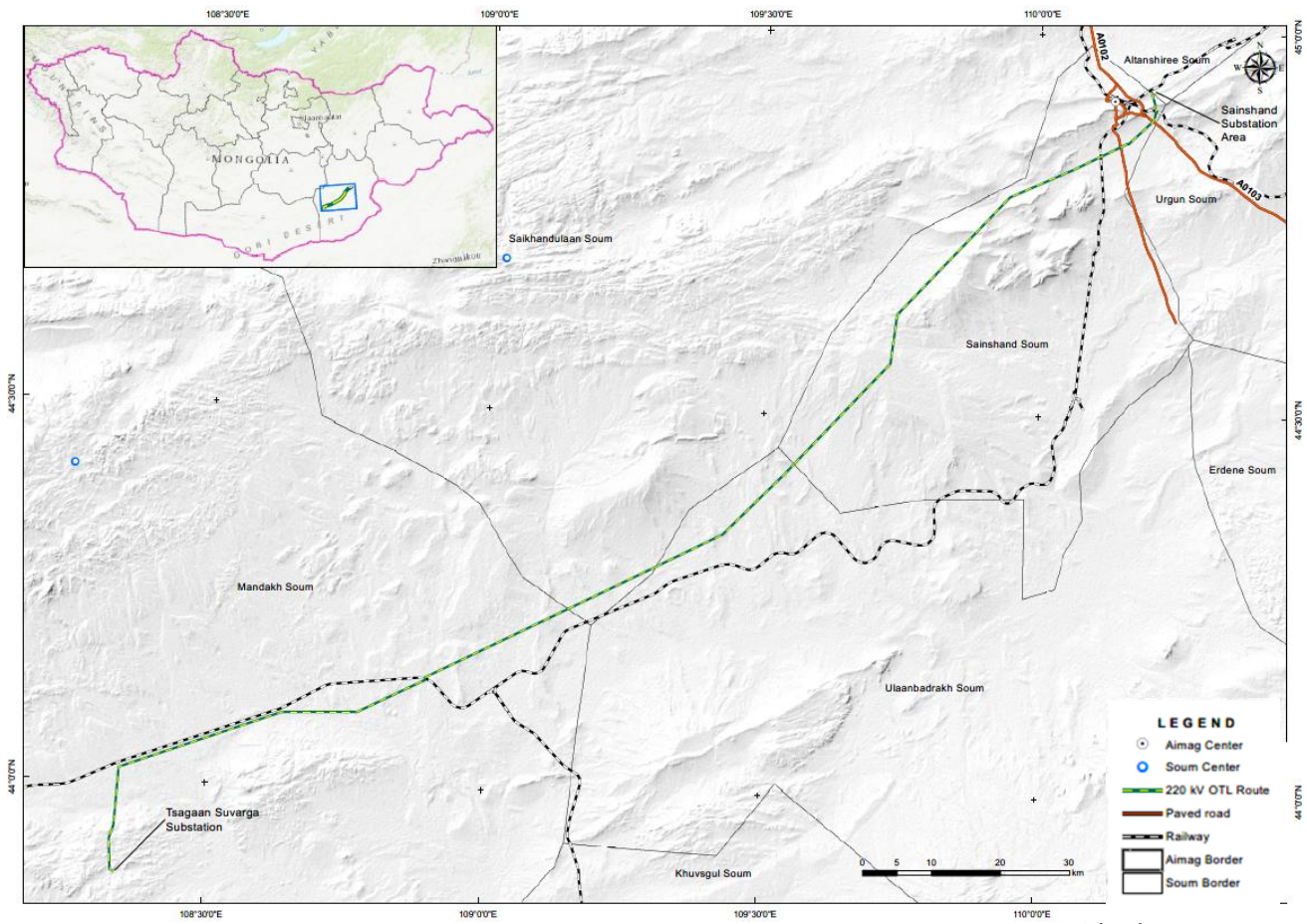


Figure 1 Project Location

In line with their Environmental and Social Policy 2019, the EBRD has assigned the Project a Category A status as the Project is a greenfield development and comprises “Construction of high voltage overhead electrical power lines”. This categorisation means that a comprehensive Environmental and Social Impact Assessment (ESIA) must be prepared, and a review of associated documents must be carried out.



The EBRD have commissioned Arcadis (UK) Consulting Limited, with their sub-consultants EcoTrend LLC, to undertake the ESIA and prepare the ESIA Disclosure Package to EBRD requirements.

This Non-Technical Summary (NTS) is one of a number of documents within the ESIA Disclosure Package, as follows:

- Environmental and Social Impact Assessment (ESIA)
- Environmental and Social Management Plan (ESMP)
- Land Acquisition and Resettlement Framework (LARF)
- Stakeholder Engagement Plan (SEP)
- Environmental and Social Action Plan (ESAP)

A Public Consultation Report will be prepared following the disclosure period to report on the outcomes of public consultation.

1.2 Purpose of the Non-Technical Summary

The purpose of this NTS is to provide an easily understandable summary of the information that is provided in the ESIA Disclosure Package documents identified above. It provides the public with information about the Project, including the outcomes of the ESIA, the management actions to address positive and negative environmental and social impacts, and the proposed stakeholder engagement process and grievance mechanism.

1.3 Scope of the Non-Technical Summary

This NTS identifies:

- The Project and alternatives considered
- Summary of environmental and social impacts associated with the Project during construction and operation
- Mitigation measures to address negative impacts
- Summary of management measures
- Overview of the Stakeholder Engagement Plan and Grievance Mechanism

2 Description of the Project

2.1 Project Overview

Development of the energy sector is outlined in Mongolia's Long-Term Development Policy: Vision 2050. The 2021 New Recovery Policy, a supporting policy to enhance the implementation of Vision 2050, includes a section on energy policy, which focuses on enhancing energy production and supply reliability by developing renewable energy facilities. The Project is included in the Government's Action Plan for 2024-2028 which also supports Vision 2050.

The Project aims to ensure reliable power supply for existing and future development projects in the Gobi Region, such as other power supply projects, expansion at Tsagaan Suvarga copper mine, development of the Altanshireet Metallurgical Complex and the Zamyn Uud Free Economic Zone. It will also assist in providing capacity to absorb additional power from new sources, especially Variable Renewable Energy sources like Photovoltaics (PV) and Wind power plant.

2.3 Key Project Characteristics

Project Route

The Project is located entirely in Dornogovi aimag and starts at a new substation due to be constructed in Sainshand. The overhead transmission line then proceeds south-west, crossing four soums – Sainshand, Ulaanbadrakh, Saikhandulaan and Mandakh – before reaching the existing substation at Tsagaan Suvarga. In general, the route proposed for the transmission line is sparsely populated and has desert vegetation characteristics of the Gobi Desert. Typical landscape is shown in the photographs to the right.

Proposed Works

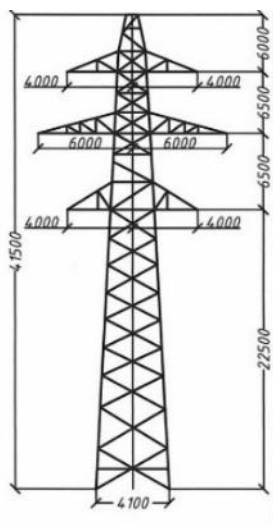


Figure 4 Example
Transmission Tower

The Project comprises the following main components:

Transmission line: A 204km 220kV double circuit overhead transmission line between the planned new substation in Sainshand and the existing substation in the Tsagaan Suvarga mine.

Towers: The double circuit overhead transmission lines will be supported by a combination of steel and aluminium towers in a portal formation with lattice towers where longer spans are required (as shown in the indicative diagram to the right). A total of 690 towers are planned, using five different types to accommodate changes in direction and elevation.

Substations. Additional equipment will be installed in the two substations to accommodate the new transmission line. No new land take for the substations is required for the Project

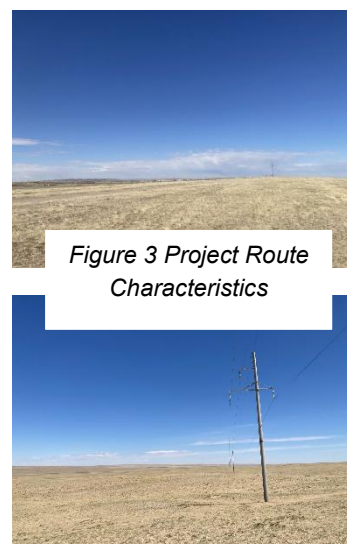


Figure 3 Project Route
Characteristics

Establishment of a Right of Way

The Mongolia Law on Energy 2001, as amended, and its associated Resolution No. 97 of 18 March 2020 require that a protective zone is established around energy infrastructure. A 6m zone, or “right of way” is required from the towers in populated areas and a 25m zone in unpopulated areas. A 25m zone is also required around substations. In these areas, it is prohibited to build any *gers* (herder houses), housing or building or conduct any activities other than those permitted by the network owners. Grazing of livestock is however permitted.



Pre-Construction

The final position of the individual tower structures will be determined based on factors such as ground conditions, elevation, and distance between towers; as well as final agreements with landowners and users along the route. A pre-construction survey and engagement with landowners/users will be completed to finalise the route.

Construction Stage

Typical works that will be required during construction include:

- Establishment of working areas, including compounds and workers' accommodation camp on the basis of agreements with the local soums, avoiding environmental and social damage
- Establishment of access tracks and provision of clear signage
- Transportation of equipment, materials and workers to site
- Levelling and excavation of tower foundations
- Erection of towers with cranes
- Stringing of lines between the towers, which will be appropriately 'tensioned' to provide the minimum clearance between ground level and the wires.
- Civil works and installation of substation equipment at both substations
- Temporary power generation
- Waste management
- Testing and first operation of equipment to ensure that the line performs as expected

The types of equipment that will be required includes:

- Excavators
- Bulldozers;
- Dump trucks for transporting excavation soil, construction materials and equipment
- Cranes
- Forklifts
- Concrete mixers
- Trucks
- Scaffolding
- Compactors
- Mechanical saws
- Light tools
- Painting equipment

The construction phase will result in the consumption of natural and non-renewable resources. Limited quantities of sand and aggregates may be required for tower construction and substation bases and will be sourced from local suppliers as needed. The volumes are not anticipated to be such to reduce available materials supply.



Operation Stage

The operational life of a tower is typically around 60 years. The equipment on the high-voltage overhead lines normally last for about 40 years. Therefore, the towers and overhead lines need to be refurbished periodically in order to maintain the network and ensure it continues supplying electricity safely and securely.

The main activities to be carried out during the operation of the Project include: operation of the substations, surveillance of the condition of the overhead lines, towers and right of way/safety zone; routine, planned and emergency maintenance and repairs; and vegetation control.

Public safety signs will be provided at substations and at the towers to indicate the danger they pose to the general public.

Project Alternatives

The Project has considered alternatives to layout, and to the process and operational aspects of the activity.

Alternative routes for the Project were not considered by the Ministry of Energy as the project was developed during the COVID-19 period and was progressed directly to a detailed design stage. As part of the detailed design stage, the route was selected to provide an optimal route between the two substations, considering less rugged terrain (hills, dunes, etc), avoiding mining areas as far as possible, and as direct a route as possible. The location was agreed in principle with various stakeholders, including the NPTG, Dornogovi aimag, Mongolian Railways, the National Emergency Management Agency and the Baganaur-Southeast Region Electricity Distribution Grid.

A 'No Project' alternative was considered should the Project not go ahead. In this case, not developing the Project would mean that the future Sainshand substation would not connect to the existing Tsagaan Suvarga substation. This would prevent the provision of a circular transmission network, which is intended to substantially improve reliability and resilience of the transmission network. This improved energy network is particularly important for many of the key development projects occurring across the Gobi region.

Overhead or underground transmission line options exist for transmission lines. Overhead lines are generally cheaper and tend to have a longer lifespan and shorter outage durations (as faults are easier to identify and repairs are easier to address).

Towers, pylons or poles can be used, and material options include wood, concrete and steel. Steel is typically used for 220 kV transmission lines and therefore has been selected for this Project. The structure of the pylon depends on whether a single or double circuit is being used, and the towers have been selected for a double circuit and their purpose e.g. suspension, change of direction, final tower.

3 Legal Aspects and Compliance

3.1 National Requirements

The Environmental Impact Assessment (EIA) requirements of Mongolia are regulated by the Law on EIA, 2012 (amended in 2024). The terms of the law apply to all new projects, as well as rehabilitation and expansion of existing industrial, service or construction activities and projects that use natural resources.

A national Environmental Impact Assessment, including a General Environmental Impact Assessment and Detailed Environmental Impact Assessment will be required for the Project. The required documents for request of General Environmental Impact Assessment have been prepared and submitted to the Ministry of Environment and Climate Change for review and approval. Once approved, the Detailed Environmental Impact Assessment will be prepared, and public consultation will be undertaken. Based on the outcomes of the consultation, the Detailed Environmental Impact Assessment will be revised and then submitted to the Ministry of Environment and Climate Change for final approval.

3.2 EBRD Requirements

The EBRD requirements include compliance with their Performance Requirements. The Performance Requirements applicable to this Project are:

- Performance Requirement 1: Assessment and management of environmental and social risks and impacts
- Performance Requirement 2: Labour and working conditions
- Performance Requirement 3: Resource efficiency and pollution prevention and control
- Performance Requirement 4: Health, safety and security
- Performance Requirement 5: Land acquisition, restrictions on land use and involuntary resettlement
- Performance Requirement 6: Biodiversity conservation and sustainable management of living natural resources
- Performance Requirement 8: Cultural heritage
- Performance Requirement 10: Information disclosure and stakeholder engagement

The EBRD also requires the Project to meet all relevant European Union (EU) environmental standards. The most relevant EU Directive in relation to the Project is EU Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment, as amended by 2014/52/EU (the EIA Directive). Other EU Directives include:

- EU Directive on the conservation of wild birds (2009/147/EC), referred to as the Birds Directive
- Directive 2000/60/EU Water Framework Directive
- Directive 2009/147/EC on the Conservation of Wild Birds, referred to as the Birds Directive
- Directive 92/43/EEC on the on the conservation of natural habitats and of wild fauna and flora, referred to as the Habitats Directive
- Directive 2003/4/EC on Public Access to Environmental Information
- Directive 2008/98/EC The Waste Framework Directive

- Framework Directive 89/391/EEC on Safety and Health at Work
- Directive 89/654/EEC concerning the Minimum Safety and Health Requirements for the Workplace

EBRD also observes the Aarhus Convention (on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters), the Espoo Convention (on Environmental Impact Assessment in a Transboundary Context) and the International Labour Organisation (ILO) core conventions.

The ESIA Disclosure Package has been prepared to meet the requirements of national law, EBRD Performance Requirements, and the above-mentioned EU and International Labour Organisation requirements.

4 Summary of Environmental and Social Impacts and Mitigation Measures

4.1 Introduction

Baseline data was collected through desk-based research and field surveys as follows:

- Biodiversity and Environment Team site reconnaissance, 12-17 May 2025
- Environmental surveys, 22-28 June 2025:
 - Air quality
 - Noise
 - Landscape and visual
 - Surface water and dry river beds surveys and sampling
 - Groundwater (herder wells) sampling
 - Soil sampling
 - Ecological surveys
- Social and stakeholder surveys, 22-28 June 2025:
 - Key informant interviews
 - Focus group discussions
 - Household surveys

4.2 Construction Phase

Air Quality

The main potential impacts on air quality during construction will be associated with generation of dust. Earthworks will result in exposed areas of soil which will potentially generate dust when it is windy. Construction activities will result in dust generation from site preparation, site excavation, construction activities and movement of heavy goods vehicles.

Construction activities are considered to be small in magnitude, as the towers are metal construction (a material with low potential for dust release), concrete foundations will be prefabricated and the duration of build at any

given tower site is likely to be relatively short-term.

It is considered that the sensitivity of the receptors is low for both dust soiling and impacts on human health as a result of the large distances to herder households (nearest being 100m from the route) and low number of camps near the route.

The construction phase of the Project has the potential to also result in temporary air quality impacts due to construction vehicles. However, emissions from vehicles are not anticipated to exceed international guidance thresholds for assessment.

With the implementation of mitigation measures proposed below, the overall effect on air quality from dust during construction is considered to be **not significant**. These effects will be temporary where construction works are in progress. No significant operational effects on air quality are anticipated.

The following mitigation measures have been recommended:

- Compliance with Mongolian dust emission standard (MNS 4585: 2007).
- An Air Quality Management Plan will be prepared and implemented by the Construction Contractor. Measures will include:
 - Plan site layout so that machinery and dust causing activities are located away from herder households.
 - Cover soil stockpiles to prevent wind whipping
 - Remove materials that have a potential to produce dust from site as soon as possible
 - Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport
 - Ensure an adequate water supply on the site for effective dust management, using non-potable water where possible and appropriate
 - Ensure all vehicles switch off engines when stationary - no idling vehicles
 - Use enclosed chutes and covered waste or materials containers
 - Avoid bonfires and burning of waste materials
 - Ensure equipment is readily available on site to clean any dry spillages
- The Construction Contractor will undertake stakeholder engagement with nearby herder camps prior to and during works.
- The Construction Contractor will set up a dedicated grievance mechanism to allow local residents to raise their concerns. Dust and air quality complaints will be recorded and addressed.

Monitoring requirements will include:

- The Construction Contractor will carry out regular site inspections during construction to monitor compliance with the schedule of mitigation measures.

Noise and Vibration

Temporary noise effects will occur as a result of the use of equipment, earthworks, and the movement of materials/personnel. The noisiest construction activities will be earthworks for the tower foundations. The predicted construction noise levels therefore have the potential for significant adverse effects on receptors within approximately 90m distance from the noisy activities associated with construction. No noise sensitive receptors

have been identified within 90m of the route alignment within which a significant effect from construction noise is likely to occur.

Vibration levels from mobile heavy construction equipment are generally considered to be imperceptible at distances greater than approximately 20m from the source.

With the implementation of mitigation measures proposed below, the overall effect on noise and vibration during construction is considered to be **not significant**.

The following mitigation measures have been recommended:

- A Noise and Vibration Management Plan will be prepared and implemented by the Construction Contractor. Measures will include:
 - Construction machinery and equipment should produce noise and vibration within permissible levels of relevant standards; or be equipped with noise reduction devices where necessary to ensure noise emission levels of vehicles and machineries comply to national standards.
 - Regular inspection of vehicle noise emission and timely maintenance to prevent noise emissions from increasing due to poor maintenance.
 - Construction operational hours will be used as a primary methodology for the control of significant noise effects, limiting construction activities to daytime periods only defined as: Monday to Friday 07:00 – 19:00.
- The Construction Contractor will undertake communication with the local herder households along the route to notify in advance of activities with the potential to generate higher levels of noise and/or vibration and the measures implemented to control noise and/or vibration.
- The Construction Contractor will undertake set up a dedicated grievance mechanism to allow local residents to raise their concerns.

Monitoring requirements will include:

- The Construction Contractor will carry out regular site inspections during construction to monitor compliance with the schedule of mitigation measures.

Biodiversity, Flora and Fauna

The Project route does not pass through any internationally protected sites. The nearest Important Bird Area within the Study Area is the Ikh Nartiin Chuluu (commonly known as Ikh Nart) Nature Reserve, approximately 120km north-west of Sainshand. The Project route does not pass through any nationally protected areas however, it does fall within the Southern Gobi Ecological Region of Mongolia, an area which has been designated nationally as a Priority Conservation; the extent of which is shown in **Figure 2**. The route does also passes through three Locally Protected Areas: Zoogiin Hooloi, Uushiin Govi and Ganzaga Uuliin Urgutgul, as shown in **Figure 3**.

Habitats and Flora

The habitats recorded along the Project route were found to be typical of arid steppe, semi-desert conditions. No habitats of notably high conservation concern have been highlighted during the survey work. The majority

of the habitats are however in good condition, which means that the habitats maintain a basic vegetation structure and/or ability to regenerate following disturbance. Most plant species recorded along the route are considered to be relatively common. However, two species are classified as Endangered (*Brachanthemum gobica* and Spotted Arnebia), and four listed as Rare (*Cynomorium songaricum*, *Potania Mongolia*, *Oxytropis aciphylla*, *Phragmites communis*).

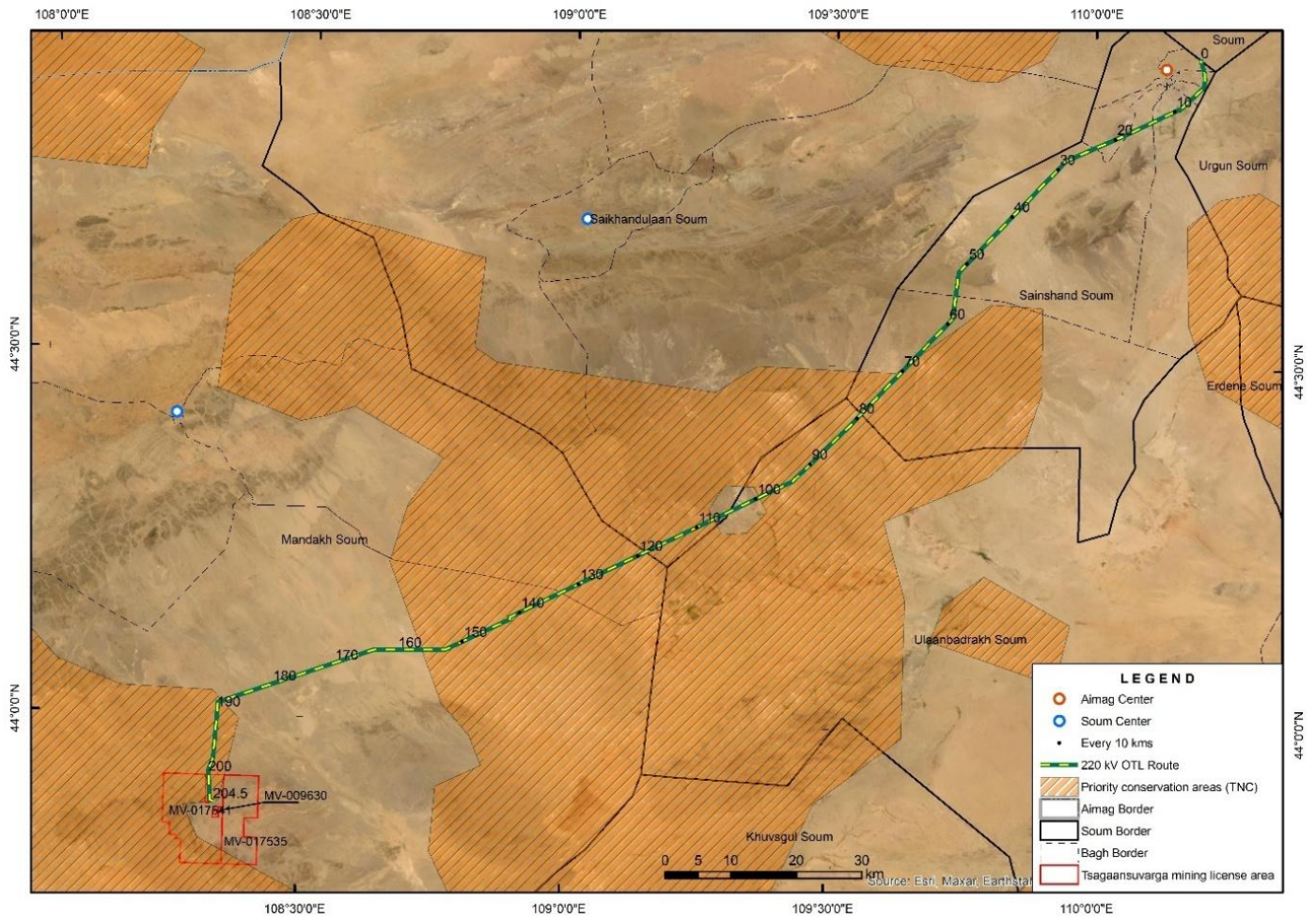


Figure 5 Local Priority Conservation Areas

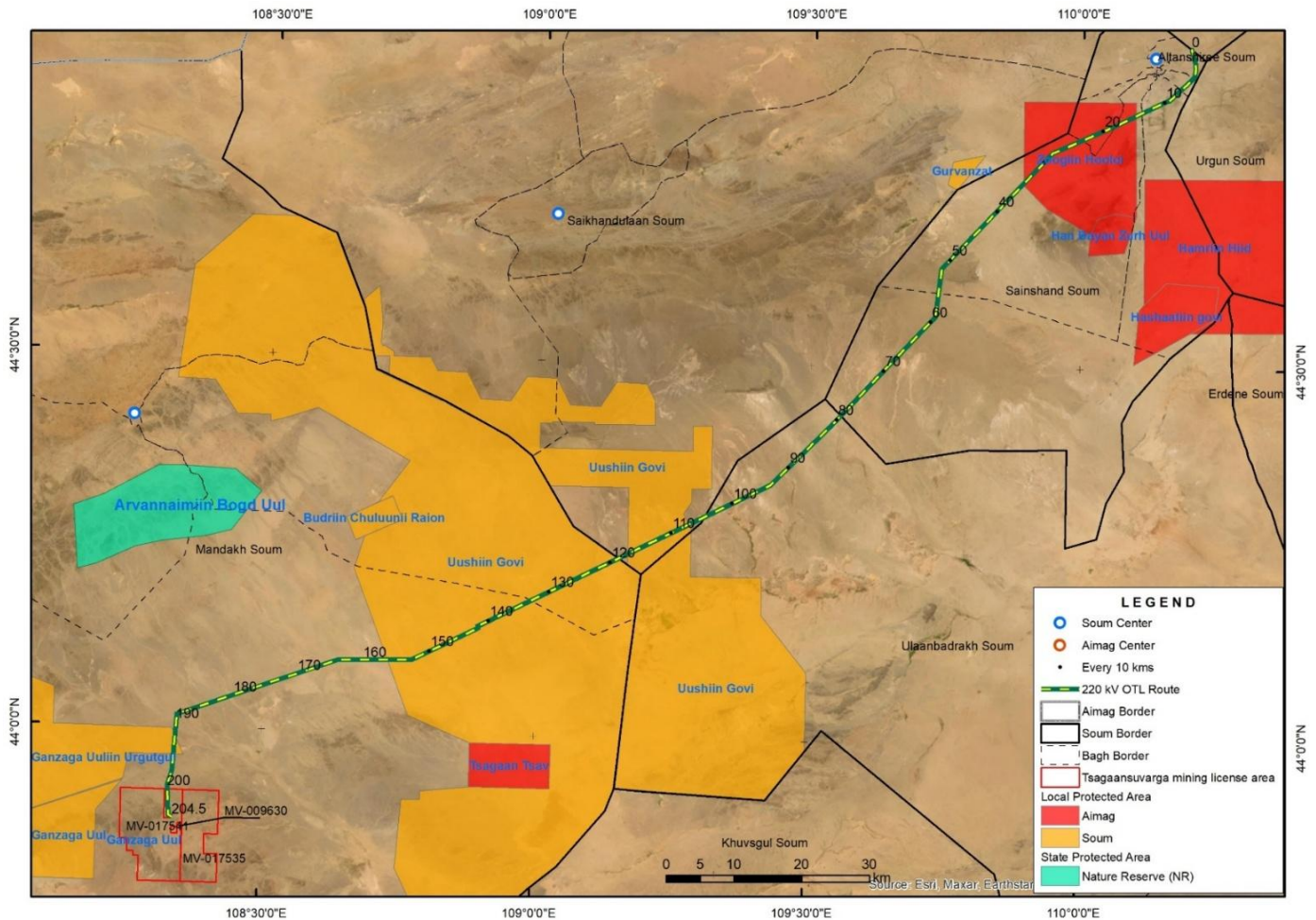


Figure 6 Local Protected Areas crossed by the Project route and other State Protected Areas within Dornogovi aimag

Terrestrial Mammals

A total of eight mammal species were recorded within the Survey Area. These included: three species of migratory ungulate, three species of rodent, one species of lagomorph and one species of hedgehog. Notable mammals recorded include:

- Goitered Gazelle - Vulnerable on both the global and regional Red Lists; included in the Mongolian Red Book (2014); listed in Appendix II of the Convention on the Conservation of Migratory species (CMS);
- Asiatic Wild Ass - Near Threatened on the International Union for Conservation (IUCN) Red List; Largely Depleted in the Green Status Assessment on July 17, 2024; included in the Mongolian Red Book (2014); listed in Appendix II of both the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and CMS; and
- Mongolian Gazelle - Least Concern on the IUCN Red List; Endangered on the Regional Red List (2006); listed in Appendix II of the CMS.



Birds

Spring and Autumn passage bird surveys have been undertaken across the Survey Area in Spring 2022 (by Sustainability East Asia and Wildlife Science and Conservation Centre of Mongolia) and Autumn 2024 (by EcoTrend and Arcadis). A diversity of bird species were recorded. The main impact pathways to birds is collision risk, there a particular focus was given to collision vulnerable species groups. Bird species within these groups which are of conservation concern (globally or regionally) were considered the highest value receptors, these include:

- Saker Falcon
- Swan Goose
- Common Pochard
- Ferruginous Duck
- Cinerous Vulture
- Eurasian Curlew
- Black-tailed Godwit
- Northern Lapwing
- Common Crane
- Falcated Duck

The bird survey results have shown a low occurrence of bird flights at collision risk height with the overhead lines, with the spring and autumn surveys reporting 12% and 21% of flights at this height respectively, and therefore design measures may be required, as set out in the table below.

Bats

Two bat species were identified:

- Gobi big brown bat (*Eptesicus gobiensis*) - Least Concern on the IUCN Red List
- Kozlov's Long-eared Bat (*Plecotus kozlovi*) - Near Threatened on the IUCN Red List

Other species

Two reptile species and six invertebrate genera were recorded during the survey work. No species of conservation concern were however recorded.

The following are the key potential impacts that could occur during the construction phase:

- Habitat destruction and degradation
- Animal mortality through vegetation clearance and vehicle collisions
- Visual and noise disturbance to animals in the area during construction
- Pollution events during construction effecting air quality and ground water
- Detrimental impacts from human pressures including:
 - Poaching by road construction staff
 - Gathering of rare plants
 - Introduction of invasive species
 - Littering by road construction staff (including food waste)
- Increased risk of wildfires

With the implementation of mitigation measures proposed below, the overall effect due to the Project construction is expected to be **minor adverse** or **negligible (not significant)**.

The following mitigation measures have been recommended:

- The Ministry of Energy, Project Implementation Unit and Construction Contractor will adopt the mitigation hierarchy when designing and implementing the Project to achieve no net loss and preferably a net gain of priority biodiversity features and the habitats and ecological functions that support them. This will include the consideration of micro-siting of pylons where the lowest impact on habitats and Rare and Endangered flora will occur. Specifically, to minimise the risk of bird collision, a re-adjustment to the route alignment is proposed near the ephemeral pond to avoid collision risk of birds associated with this feature (likely to attract bird aggregations when wet).
- A Noise and Vibration Management Plan and Air Quality Management Plan will be prepared and implemented by the Construction Contractor. The Construction Contractor will comply with the Project Biodiversity Management Plan.
- These Plans will include measures to be applied by the Construction Contractor, such as:
 - The elm trees along the route that support nesting Cinereous Vulture should be retained.
 - Sensitive siting of construction compounds, lay-down areas and access routes to avoid ecological features.
 - Use of low-impact construction methods.
 - Designated refuelling stations.
 - No-work buffer zones around Rare and Endangered flora; where impact is not avoidable, translocation of plants should be secured by competent and experienced professionals.
 - Ensure no herbicides are used.
 - Inspect and clean construction equipment and clothing to prevent the introduction of invasive species.
 - Fire prevention and management controls will be enforced.
 - Prior to vegetation clearance or excavation, the area will be walked to flush mammals (and other fauna), the clearance will then be completed in a systematic way to allow further movement of animals away. Construction activities should be suspended if large mammals are found to be using a water source to drink until they naturally disperse to at least 350m.
 - Excavations should avoid any animal burrows noted.
 - Low speed limits for vehicles.
 - If nighttime working becomes proposed, an appropriate method of works will be required.
 - Clearance of low vegetation should avoid the breeding season (March to August inclusive); if this is not possible, the area should be walked prior to clearance to check for bird nests and if an active nest is found a no-works buffer zone of at least 20m should be clearly marked.
 - Construction activities with high noise levels should ideally be avoided within a 500m signed buffer of any raptor nest; if this cannot be implemented, a suitably qualified and experienced ecologist should be contacted to monitor the nest.
- The Construction Contractor will brief construction workforce on working protocols and enforcement measures and monitor unauthorised activities. A strict ban on poaching will be enforced.

Monitoring requirements will include:

- The Construction Contractor will monitor for invasive species during and post-construction and implement immediate removal strategies, if detected.
- The Construction Contractor monitor zero-tolerance waste policy and waste management programme.

- The Construction Contractor will monitor unauthorised activities, such as gathering of plants, and enforce strict penalties for violations.

Cultural Heritage

The south-eastern region of Dornogovi aimag, including the Project soums, is home to a rich and varied cultural landscape. The Mongolian Gobi Desert is the largest dinosaur fossil reservoir in the world, particularly for Cretaceous period fossils. This is recognised by the inclusion of Cretaceous Dinosaur Fossil Sites in the Mongolian Gobi on the UNESCO's Tentative List. Dornogovi *aimag* includes part of the Gobi Desert, which is located approximately 104km to the south of the Project.

Eight identified immovable monuments of history and culture (Archaeological Sites and Monuments) are present within 35km of the Project, the closest of which is Hiimoriin Ovoo located approximately 0.8km from the Project. A further 14 cultural heritage receptors have been identified through engagement with the local communities, ranging from 5km to 70km distance from the Project route.

All works that involve earthworks/groundworks could potentially result in physical damage to previously identified or unidentified cultural heritage assets. This includes construction of the transmission line and construction/accommodation camps. Potential physical damage to both known and currently unknown cultural heritage can be also caused by the presence of non-local workforce during the construction, for example through accidental damage.

Based on the current understanding of the Project and its location, it has been assessed that there will be **no adverse effects** to the known cultural heritage resource. The Ministry of Energy will be required to commission a specialist archaeological/palaeontological study to meet national legislative requirements. Should the Project design change, or new assets be identified during the course of additional surveys, this assessment may be subject to change.

The following mitigation measures have been recommended:

- Prior to construction, in line with national legislation, the Ministry of Energy/Project Implementation Unit will commission a specialist Mongolian organisation to undertake archaeological and paleontological surveys (and potentially also an ethnographical study, where the specialists consider necessary) along the final proposed transmission line route.
- Should any archaeological/ paleontological assets be identified during the course of further survey, the preferred method of mitigation would be avoidance i.e. to re-align the route where feasible.
- If the impacts to any identified archaeological/ paleontological assets cannot be avoided and design mitigation is not successful, a phase of archaeological/ paleontological recording and excavation would be required to remove the assets. The detail of these measures will be included in a specific Cultural Heritage Management Plan to be developed by the Ministry of Energy/Project Implementation Unit /their specialised consultants and that will form part of the Construction Environmental and Social Management Plan (ESMP).
- The specialised consultants will also prepare a Chance Finds Procedure, that will also form part of the Construction ESMP, that complies fully with EBRD Performance Requirement 8: Cultural Heritage.
- The Construction Contractor will implement the Cultural Heritage Management Plan and Chance Finds Procedure. Training will be provided by a Cultural Heritage specialist via toolbox talks to construction staff prior to ground disturbance activities.

- A watching brief will be in place, in line with the Chance Finds Procedure, during any ground disturbance works. Any chance finds discovered will be managed in accordance with the Chance Finds Procedure by a Cultural Heritage specialist.
- The Construction Contractor will inform local communities of any chance finds via local bagh meetings between the contractor and bagh leaders. Additional mitigation measures may be required to be implemented if the chance finds are associated with a local community member, in liaison with the affected party.

Monitoring requirements will include:

- The Construction Contractor will monitor for chance finds during any site excavations, in accordance with the Chance Finds Procedure.

Landscape and Visual

The Study Area is located within the wide area of the 'East Gobi Depression Zone' – part of the 'Greater Gobi' semi-desert/steppe region, as delineated by Mongolia's physical geographic classification.

The broad landscape is characterised by expansive plains lying just below 1,000m in elevation. The plains are generally open, arid steppe with very little surface water, trees or other vegetation. These are interspersed with ranges of low landforms rising to up to, at most, 400m above the plains. These are often rounded sandy hills or eroded rocky outcrops generally aligned north-east to south-west, which then rise in height towards the central southern part of Mongolia (part of the Gobi-Altai mountains), and towards the south, into the People's Republic of China.

The following characteristics have been identified as susceptible to change brought about by the Project:

- The relative remoteness and tranquillity of the semi-desert steppe landscape with very few artificial light sources, disturbed by occasional elements of built form.
- The openness and vastness of the semi-desert steppe landscape, comprising flat wide valleys set between gently sloping domed sand-topped hills and eroded rocky outcrops, disturbed only occasionally by built elements.
- Long panoramic views along open valleys and from hilltops, that are occasionally interrupted and/or disturbed by built development in the form of vertical linear energy transmission infrastructure, renewable energy development and settlements.
- Areas of occasional seasonal wetland and watercourse, which, despite the predominant arid climate, help shape the form of hillsides and some valley floors and which provide vital water sources for the sparse vegetation and wildlife.
- A few locations of local cultural and social significance i.e. Hiimoriin Ovoo and the adjacent part of the Ulaan Tolgoi valley racehorse competition/regional sports area.

The following visual amenity receptors were identified as potentially affected by the Project:

- The community of Sainshand (i.e. residents and visitors), including those using Tanktai ovoo.
- Visitors to Khan bayanzurkh mountain top.
- Users and visitors to Hiimoriin ovoo and the adjacent part of the Ulaan Tolgoi valley racehorse competition area.

With the implementation of mitigation measures proposed below, the effects on landscape character are anticipated to be **minor adverse (not significant)**. The effects on visual amenity, assuming the implementation of mitigation measures proposed below, are anticipated to be **minor to moderate adverse (significant)**.

The following mitigation measures have been recommended:

- The Construction Contractor will programme the most intense parts of construction activity that occur near to areas of identified cultural and social value to avoid those times of year that they are most visited/considered important.
- The Construction Contractor will take into account considerate placement of particularly visual elements of the construction, i.e. compounds, stockpiles of materials, worker accommodation camp, so that they cover the minimum area required and are located away from areas used by sensitive receptors.
- The Construction Contractor will apply restrictions that limit the use of lighting to the minimum quantity and illumination necessary to ensure safety, and so to minimise light spillage, sky glow and to minimise glare to surrounding sensitive receptors.
- The Construction Contractor will re-contour of disturbed land to original formations, where appropriate, in line with the Soil Storage and Site Reinstatement Plan.

Soils and Natural Hazards

Soils

Soil surveys conducted within the Study Area identified nine subtypes of soil cover, belonging to the following three major soil categories: Semi-desert brown soils; Semi-desert light brown soils; and Desert grey-brown soil.

All three major soil categories were represented along the Project route, and mostly comprised thin, sandy loam or sand soils, some with rock fragments.

Potential impacts on soils are anticipated to be erosion, deterioration, compaction and contamination and the following activities have the potential to cause them:

- temporary use of land for project facilities (e.g. temporary access roads and main and ancillary compounds/camps)
- land permanently required for the Project
- soil permanently excavated to provide foundations for the towers

Natural Hazards

Mongolia is vulnerable to a wide range of natural hazards, including floods, dust storms, droughts, wildfires and earthquakes. The country is in a seismically active zone. Notable hazards that have affected Mongolia in recent years include snow and dust storms, thunderstorms, floods, earthquakes, drought, steppe and forest fires, infectious diseases, and dzud.

Dust storms are a prevalent hazard in Dornogovi aimag, exacerbated by desertification and climate change. Dzud is also a recurring winter disaster in Mongolia, characterised by extreme cold, heavy snowfall, and ice layers that trap pasture and water sources. In early 2024, dzud conditions affected Dornogovi aimag, leading to livestock losses and threatening traditional herding livelihoods. The phenomenon is intensified by climate

change and desertification. While less frequent in Dornogovi aimag compared to other regions, grassland fires can occur, especially during dry periods, destroying vegetation and leading to soil erosion and increased susceptibility to dust storms. Flooding occurs, particularly during spring thaws or intense rainfall events.

With the implementation of mitigation measures proposed below, the effects on soils and natural hazards are anticipated to be **not significant**.

The following mitigation measures have been recommended:

- A Soil Storage and Site Reinstatement Plan will be prepared and implemented by the Construction Contractor. Measures will include:
 - Construction sites will be properly organised with the layout of access routes, compounds and stockpiles. Multiple vehicle tracks will be avoided by ensuring clear access routes are signposted.
 - Soils will be stripped according to the thickness of soil horizons and soil types with minimum mixing of horizons.
 - No soil stripping will occur during rain or wet ground conditions.
 - Soils will be stockpiled in designated stockpile areas, selected to avoid increased flood risk.
 - Topsoil and subsoil materials will be stockpiled separately and clearly labelled.
 - Given the high risk of erosion by wind in the area, the time for which soils are stockpiled should be minimised. Where practicable, stockpiles to be seeded with low maintenance grass mix to minimise risk of soil erosion and dust spread over adjacent grazing grass.
 - Surplus topsoil should be reused to maximise its value and potential such as landscaping. Where required, soils should be reconditioned before reinstatement and reuse so they are in a suitable condition for the intended re-use.
 - There will be designated collection points for domestic and hazardous waste. Oil storage and distribution activities shall adhere to the relevant national standards.
 - Requirements for reinstatement following construction activities.
- The Construction Contractor will develop, implement and maintain an Emergency Preparedness and Response Plan.
- Construction staff will be provisioned with appropriate personal protective equipment (PPE) to mitigate risks of weather conditions.
- The Construction Contractor will deliver health and safety training to all construction staff prior to beginning work and will include information on the signs of weather conditions and related health impacts; natural hazards; and fire prevention and suppression, including information on how to avoid health and safety impacts should a wildfire occur.
- The Construction Contractor will ensure that any flammable materials are stored away from areas frequently used by workers to reduce risk of fire spread. Fire suppression equipment will be available on site.

Monitoring requirements will include:

- The Construction Contractor will monitor weather forecasts prior to undertaking work and reschedule works where possible.
- The Construction Contractor will monitor reinstatement activities to ensure that sites are returned to their pre-construction state or better.

Water Environment

The proposed Project route is located within one river basin, the Central Asian basin. Several water features are located within the Study Area, including dry riverbeds, human drinking water wells and a wetland.

Rainfall either infiltrates into the ground or, when the ground is saturated or rainfall is very intense, forms runoff that follows the existing topography, including the dry riverbeds.

Water quality data was obtained from samples collected from the three wells during the site visit undertaken in July 2025. The majority of the key chemical indicators meet the requirements specified in the MNS 0900:2018 National Standards for two of the wells.

Potential impacts to the water environment include flood risk and land drainage, water quality, water resources, hydromorphology. These impacts may occur through the following activities:

- The crossing of dry riverbeds by Project infrastructure
- Wastewater and communal waste generation by construction workers
- Runoff from construction plant
- Storage and use of oils and chemicals
- Use of water by construction workers and facilities
- Works around drinking wells

With the implementation of mitigation measures proposed below, the effects on flood risk, land drainage and water quality are anticipated to be **negligible (not significant); and minor adverse (not significant)** in relation to water resources and hydromorphology.

The following mitigation measures have been recommended:

- A detailed Water, Wastewater and Drainage Management Plan will be prepared and implemented by the Construction Contractor. Measures will include:
 - Natural drainage patterns will be maintained and not obstructed where practicable. Temporary drainage systems will be implemented to alleviate localised surface water flood risk and prevent obstruction of existing surface runoff pathways. Construction drainage will be installed around all sites liable to be subject to surface water and/or flooding.
 - Heavy machinery will not cross smaller riverbeds except at formal temporary crossing locations. Channels shall be restored if altered by temporary construction activities.
 - No use of surface or groundwater will be permitted without prior consent and permits in place. Construction workers will be provided with potable water from approved sources.
 - Local herder wells within the Project footprint/adjacent to Project works will be mapped and any local herders' well adjacent to construction works will be demarcated and protected from damage. Any loss of wells used by local herders will be replaced.
 - Fuels, oils, flammable liquids and chemicals will be stored responsibly, away from sensitive water receptors. All refuelling, oiling and use of chemicals will use suitable drip trays and in the event of a spill be cleaned up immediately. Spill kits will be made readily available to allow for the rapid clean up of any accidental spills.
 - No direct or indirect discharge from the site to ground or surface water features will be permitted, with wastewater to be tankered off site.
- An Emergency Preparedness and Response Plan will be developed and implemented by the Construction Contractor, outlining procedures to be implemented in case of unplanned events, including but not limited to

extreme weather events and pollution incidents.

Monitoring requirements will include:

- The Construction Contractor will regularly monitor weather forecasts in order to ensure there is enough time to evacuate if a flash flood is expected to occur.
- Water quality monitoring will be undertaken by the Construction Contractor when working near the wetland/existing water supply wells and post-construction for an agreed period to compare against pre-Project baseline conditions.

Social and Community

There are a number of health and wellbeing impacts that need to be considered during construction activities. Direct geophysical effects such as personal injury may occur due to a range of construction activities including increased road traffic, earthworks and excavation and land clearance as well as the movement of construction personnel and material. These activities may also heighten dust and emissions levels that can impact physical health by way of impediments to breathing and a range of eye and respiratory conditions and infections.

Another significant potential health impact of construction stems from the presence of the construction workforce. An influx of non-local, expatriate, or inter-regional, workers heighten the risk of communicable disease spread because of the increased number of carriers from outside the area and more concentration human interaction. This includes the spread of infectious diseases like Coronavirus, Pneumonia, and Flu, as well as Sexually Transmitted Diseases, including HIV/AIDs, and the dangers these pose for unwitting partners. An influx of construction workers can also result in friction with the local community, affecting community cohesion.

Specifically with respect to safety and security and gender, Mongolia has a high rate of gender based violence and harassment and exploitation, sexual abuse, and sexual harassment. Gender based violence and harassment is known to be a risk in the construction sector, especially within local communities when there are large influxes of male workers from outside the area.

In addition to the health and wellbeing impacts, the Project is anticipated to impact infrastructure and services. Proposed construction activities, and any net increase in local population due to an influx, will increase demand on existing local services and infrastructure during construction. Specifically, this may include increased demand for healthcare, catering, and administrative engagement, fuel and power to support construction machinery, water for the site workforce and at any workers' accommodation camps, as well as water for materials and processes such as concrete mixing and dousing.

With the implementation of the mitigation and enhancement measures proposed below, the social and community effects are anticipated to be **minor adverse to negligible (not significant)** for the local communities in relation to construction activities and influx. Effects on the health and well-being of vulnerable people, including herder household members, and women and children, are anticipated to be generally **moderate adverse (significant) to minor adverse (not significant)**. Effects on infrastructure and services will be at most **minor adverse (not significant)**.

The following mitigation and enhancement measures have been recommended:

- A Community Health, Safety and Security Management Plan will be developed and implemented by the Construction Contractor. This will be supported by the following plans that will be developed and implemented as part of the Construction ESMP:
 - Air Quality Management Plan
 - Noise and Vibration Management Plan
 - Traffic Management Plan
 - Water, Wastewater and Drainage Management Plan
 - Emergency Preparedness Plan
- An Influx Management Plan will be developed and implemented by the Construction Contractor to address the risks and potential impacts associated with influx to and from the Project, especially in-migration of people from outside of the Project area. The Influx Management Plan will aim to: minimise the potential for influx to occur; mitigate the impacts associated with influx that do occur; and monitor any residual project-induced influx.
- The Construction Contractor will promote local workforce recruitment to minimise influx, through the development and implementation of a Local Employment and Procurement Policy and Plan, which will ensure that priority is given to employing the local workforce where the skills are appropriate. Available positions will be disclosed to the general public through various channels (such as meetings, websites, etc) identified in the Stakeholder Engagement Plan. The Construction Contractor will also work with the local authorities to identify suitable candidates. Positions will be open to all people locally of working age and ability, including women.
- The Construction Contractor will prepare and implement a Workers' Accommodation Camp Plan in line with EBRD's (2009) *Guidance Note: Workers' accommodation: processes and standards*, and located at least 1 km from existing residential settlements. Monitoring and reporting of camp conditions will be undertaken by the Construction Contractor on a monthly basis.
- The Project Implementation Unit will develop a Project Code of Conduct. The Construction Contractor will comply with this code, and all staff, including sub-contractor staff, will be required to read and sign this Code. The Project Implementation Unit and Construction Contractor will induct staff for cultural sensitisation and site safety procedures and inform them of disciplinary measures to be employed for non-compliance.
- The Project Implementation Unit will develop a Project Discrimination and Harassment Policy and Gender Equality and Gender-based Violence and Harassment Action Plan, that the Construction Contractor will comply with. The Action Plan will include proactive measures to promote women's employment. Training will be provided to Project employees, suppliers and contractors on Gender-based Violence and Harassment issues.
- With regards to safety on the site, the Construction Contractor will erect warning signs at appropriate sites near Project access roads and works areas will be cordoned off. A Security Plan will also be prepared and implemented by the Construction Contractor; this will cover the need to undertake due diligence for all security personnel to make sure they have appropriate licensing, experience and training; and the provision of training in the use of force and GBVH issues.
- As part of the current ESIA work to meet EBRD requirements, a Project ESIA Disclosure Package will be disclosed in early 2026 for a period of 120 days. This NTS forms part of the Disclosure Package. Within one month of the 120 day disclosure period, a Public Consultation Summary Report will be prepared and disclosed. Where necessary, an updated ESIA Report and associated documents will also be prepared and issued on the EBRD website; and an updated NTS provided at the aimag and soum level.
- A Project Stakeholder Engagement Plan has been prepared as part of the Project ESIA Disclosure Package. Both the Project Implementation Unit and the Construction Contractor will appoint a Community Liaison Officer. The Project Implementation Unit will update this Stakeholder Engagement Plan prior to commissioning a Construction Contractor. The Construction Contractor will be required to prepare a Construction Stakeholder

Engagement Plan with a detailed engagement programme to take place prior to and during construction.

- The Community Liaison Officers will consult regularly with local communities, in accordance with the Construction Stakeholder Engagement Plan, and raise awareness within the affected communities on any health, safety and security concerns. Advance warning of the works will be provided.
- A Community Grievance Mechanism will be established by both the Construction Contractor and the Ministry of Energy/Project Implementation Unit, that will be available to the general public and will be free from harm or retaliation. Anonymous reporting will be possible. The Grievance Mechanism will be widely disclosed by various means, such as local notices, meetings, via stakeholder events, etc. as outlined in the Project Stakeholder Engagement Plan.
- With respect to vulnerable people, additional measures will be put in place by the Construction Contractor where they may be affected by the construction phase. This will include, for example, targeted stakeholder engagement (at a location suitable for the stakeholder), support with applications for employment, accessible grievance channels and support in transport to engagement events.
- The Construction Contractor will coordinate with the relevant authorities with respect to both infrastructure crossed by the Project and infrastructure requirements for the Project (e.g. water, power).
- The Construction Contractor will prepare and implement an Emergency Preparedness and Response Plan. As part of Plan, the Construction Contractor will identify suitable health facilities in liaison with local health authorities to ensure workforce healthcare demands do not detriment resident users. Specific consideration will be given to the limited mobile phone data coverage along the alignment and the need to consider alternative to mobile phone, such as satellite phones. Project specific emergency response drills shall be carried out on a periodic basis (at least monthly). All staff must participate in these drills. Periodic emergency drills at both community and district levels will test the functionality of evacuation procedures, communication flows, first-response capacity, and stakeholder coordination mechanisms. Following every exercise and drill the Construction Contractor will conduct a debriefing/review and decide on revisions to the Plan.

Monitoring requirements will include:

- The Project Implementation Unit will monitor the implementation of the Gender Equality and Gender-based Violence and Harassment Action Plan.
- The Construction Contractor will maintain gender disaggregated data on staff and contractors.
- The Project Implementation Unit and Construction Contractor will monitor the number, type and response to community grievances, including Gender-based Violence and Harassment grievances.

Economy, Employment and Livelihoods

Project construction will have a number of positive national, regional and local economic and employment benefits. The construction phase is anticipated to be in the order of 24 months, and it is expected that during this time, short-term direct employment opportunities will be created. Employment will provide workers with the opportunity to up-skill, both through obligatory induction training and through more applied short courses in excavating, levelling, compacting and vehicle and equipment use. There will also be an increased demand for local services and goods. Benefits may be enhanced if local companies are employed during construction and local business are promoted for use by the Construction Contractor.

Conversely, and contingent on local surpluses and productive capacity and responsiveness, a significant increase in demand for goods and services due to a temporary labour influx can lead to local inflationary

pressures and increased living costs if supplies of labour, goods and services cannot be met.

With the implementation of the mitigation and enhancement measures proposed below, the overall effect on the economy, employment and livelihoods is considered **moderate to major beneficial**. The effect on living costs is considered **negligible (not significant)**.

The following mitigation and enhancement measures have been recommended:

- The Project Implementation Unit will prepare and implement:
 - Project Human Resources Policy and Procedure
 - Project Code of Conduct
 - Project Discrimination and Harassment Policy
 - Project Supply Chain Policy and Management Plan
 - An overarching Labour Management Plan
 - Project Gender Equality and Gender-based Violence and Harassment Action Plan
- The overarching Labour Management Plan will include labour key performance indicators.
- The Construction Contractor will comply with the above. To complement the above, the Construction Contractor will also prepare and implement:
 - A Construction Labour Management Plan, which will include information on working conditions and entitlements, mental health, welfare facilities, training, working hours, health and safety, recruitment process and hiring procedures, and child and forced labour.
 - A Local Employment and Procurement Policy and Plan, which identifies local employment and local content requirements; this should include purchase of goods from local herders, especially those directly affected by the Project. It should also take account of local demand and supply for basic goods to avoid pressures on basic foodstuffs and to help manage inflationary pressures
 - A Training Plan, which sets out induction, generic and job-specific training requirements and frequencies.
 - A Supply Chain Management Plan, to ensure that all sub-contractors comply with the same requirements as the main Construction Contractor, including compliance with national legislation and EBRD requirements such as avoiding child labour or exploitative practices.
- The recruitment process will be fully disclosed to the public and open to all people locally of working age and ability, including women. The Construction Contractor will work with the local authorities to favour local community members that have been residing in the Project Area long-term. Available positions will be disclosed to the general public through various channels (such as meetings, websites, etc) identified in the Project Stakeholder Engagement Plan.
- Both the Project Implementation Unit and the Construction Contractor will appoint a Community Liaison Officer to facilitate engagement with the local communities in relation to labour opportunities.
- The Project Implementation Unit will work with the Construction Contractor to undertake community awareness sessions in relation to Gender-based Violence and Harassment and the mechanisms available for reporting any incidents (see Grievance Mechanism below) in advance of the construction activities, including mechanisms that exist via local health organisations and the police.
- A Community Grievance Mechanism will be established by both the Construction Contractor and the Ministry of Energy/Project Implementation Unit, that will be available to the general public and will be free from harm or retaliation. Anonymous reporting will be possible. The Grievance Mechanism will be widely disclosed by various means, such as local notices, meetings, via stakeholder events, etc. as outlined in the Project Stakeholder Engagement Plan.

- A Labour Grievance Mechanism will be established by both the Construction Contractor and the Project Implementation Unit.

Monitoring requirements will include:

- The Construction Contractor will monitor labour key performance indicators set by the Project Implementation Unit, such as the numbers of local workers and provide gender-disaggregated workforce numbers; and report on this monthly to the Project Implementation Unit.
- The Project Implementation Unit and the Construction Contractor will monitor the number and types of community and labour grievances.

Land Use, Tenure and Displacement

No land take is required at the Sainshand and Tsagaan Suvarga substations due to the Project. The main permanent land required for the Project is associated with the construction of the tower foundations along the Project route and accommodating the 25m right of way. Certain activities are restricted within the right of way, including the presence/construction of *gers*, housing or building or any activities other than those permitted by the network owners or possessors within such boundaries.

No physical displacement is anticipated as a result of the Project; there are no structures within the Project route or its right of way. There are no herder camps or assets within the 25m right of way.

Land use along the Project route and its 25m right of way comprises:

- Pastureland used for grazing livestock and camel, though grazing is permitted within the right of way
- Sections of four mining licence areas, three exploratory and not currently in use and the Tsagaan Suvarga mine area
- A section of a blasting storage site currently under construction
- Sections of three local protected areas (see Ecology above)
- Two areas of land allocated for development but not currently used
- Infrastructure, such as roads, railways and transmission/communication lines

The NPTG, as the final operator of the transmission line, will need to secure possession rights for the route and its right of way in accordance with the Law on Land. This will entail engaging with the various land users and owners to agree the route. Where agreement cannot be reached, route adjustments may be required. Once a final route is agreed, the NPTG will need to undertake an Application for Land Possession in accordance with the Law on Land.

With the implementation of mitigation and enhancement measures proposed, **negligible (not significant)** effects are anticipated in relation to land uses at the current mining licence areas, locally protected areas and land areas allocated for development and the land under construction for explosives storage, assuming either agreement is reached with those land owners/users, or the route is amended accordingly. **Negligible (not significant effects)** are also anticipated in relation to economic displacement such as the loss of access to pastureland under the tower footprints (which will be minimal compared to the available pastureland area in the aimag); and the permanent land take effect on land ownership, use or impact on business viability at Tsagaan

Suvarga mine.

The Project is not anticipated to have any permanent displacement impacts on other infrastructure such as the transmission lines, roads and railways it crosses. None of these features will need to be moved or dismantled as a result of the Project. However, there is a potential for an impact on their functionality (e.g. use of a road if the cables fall) in the event of an emergency scenario, though this will be addressed through appropriate planning and engagement with the relevant infrastructure owners. Overall, a **minor adverse (not significant) effect** may occur during emergency scenarios.

During construction there will be a temporary loss of access to pastureland, though access restrictions will likely be short term and generally localised. Livestock grazing is usually undertaken over a wide area and during the summer months when construction is likely to take place, herder households often move to summer pastures.

Additional potential impacts on herder's livelihoods include dust emissions from the construction works that may limit access to pasturelands. Also, as pastoral livestock along the Project route roam relatively freely, construction traffic and works present an elevated injury risk to livestock, depending on final construction routes and restrictions on animal access. The Project may also result in temporary changes to water resources, including the depletion of water through abstraction and potential pollution risk in the case of accidental spillages and leakages. These could all result in livelihood impacts on herder households.

With the implementation of the mitigation and enhancement measures proposed below, the land use impacts are anticipated to be **negligible (not significant)** and the physical and economic displacement impacts are anticipated to be **minor adverse (not significant)** with the potential to reduce to **negligible (not significant)** depending on the final construction approach.

The following mitigation and enhancement measures have been recommended:

- The NPTG will seek the official agreement of land owners and users along the route; where agreement is not reached, an alternative route may be required. The overhead line should be positioned at a sufficient distance to avoid direct impact on adjacent infrastructure in the event of a failure such as tower collapse or cable detachment. Whilst the Project is not considered to result in a significant impact in relation to electromagnetic fields, any micro-siting of the towers should avoid siting ideally no closer than 100m to a herder camp but always maintaining a 25m right of way from herder camps.
- The Project Implementation Unit will establish a Change Management Procedure that triggers the requirement for additional or new environmental and social assessment for changes to project components, such as route and location changes. The Environmental and Social screening tool in the Environmental and Social Management Plan will be used to initially screen for impacts. Where necessary, the route will be re-aligned to avoid any physical or economic displacement.
- If, following the surveys, it is determined that physical or economic displacement impacts of significance are unavoidable, then a Resettlement Action Plan or Livelihoods Restoration Plan will be prepared in accordance with the Project Land Acquisition and Resettlement Framework.
- Once a final route has been selected the NPTG will apply for land possession in line with the Law on Land and the route will be clearly demarcated. The Project Implementation Unit will work with the local soums inform local herders of the planned Project route to avoid the establishment of any new camps or structures within the right of way.
- The MoE/NPTG will ensure that appropriate agreement is reached with the relevant infrastructure owners where the route crosses other infrastructure; and all relevant operating criteria will be employed on the Project. This

may include obtaining the necessary permissions to cross or work those, and either agree crossing methods or compensate for works conducted by those operators/owners during the crossing to minimise disruption to their use during construction.

- The Construction Contractor will be required to select temporary site requirements based on minimal environmental and social impacts, including avoiding any physical and economic displacement. If any physical and economic displacement is required, the Construction Contractor will prepare a Resettlement Action Plan or Livelihoods Restoration Plan in accordance with the Project Land Acquisition and Resettlement Framework.
- During construction, the Construction Contractor will ensure that access routes should be clearly demarcated to avoid multiple tracks being made during maintenance activities. The Construction Contractor will develop and implement:
 - Code of Conduct
 - Construction Environmental and Social Management Plan
 - Construction Traffic Management Plan
 - Pollution Prevention Plan
 - Waste Management Plan
- The timing of construction works will be such to minimise impact on herders, where possible e.g., during summer months when there are fewer herders present.
- Local communities and herder households will be given advance notification of the start of the works. As described earlier, a community grievance mechanism will be in place.
- Access will be maintained to all herder households during construction.
- Should any accidental damage occur to assets or land used temporarily during the construction works, the Construction Contractor will provide mitigation and compensation in line with the Project Land Acquisition and Resettlement Framework.
- Following the temporary use of land, the Construction Contractor will reinstate the land in accordance with the Soil Storage and Site Reinstatement Plan.

Monitoring requirements will include:

- The Project Implementation Unit and the Construction Contractor will monitor the number and types of community grievances related to land take and resettlement (for physical or economic displacement).
- Where relevant, monitoring of the land acquisition and compensation activities will be undertaken by the relevant implementing part to ensure compliance with EBRD requirements.
- The Construction Contractor will monitor the local demand and supply for basic goods and local price trends, to avoid pressures on basic foodstuffs and to help manage inflationary pressures. Mitigation measures will be required in the event of increased living costs.

Labour and Working Conditions

The Construction Contractor will be required to comply with the Mongolian Labour Code on working hours, occupational health and safety, management of non-employee relations and grievances, and working conditions as a minimum. Where the Labour Code does not cover the full range of working conditions, good international practice should be followed. Construction workers' accommodation camps will be required to comply with EBRD Performance Requirements. If not managed in accordance with this practice and legislation, there is a risk of exploitative working practices, labour grievances, supply chain issues, occupational health and safety concerns

(such as insufficient PPE), and child and forced or compulsory labour.

Without a supply chain management procedure in place and being implemented, there is a risk that social and labour aspects in management of the supply chain are not considered sufficiently. A predominantly migrant workforce could result in an increased risk of child and forced labour in the supply chain. Supply chain workers could be located in Mongolia or in other countries and they may be more vulnerable to unsafe work sites, and without direct monitoring from Project personnel, forced and child labour may be used.

In relation to occupational health and safety, it is assumed that the Construction Contractor and any sub-contractors will have sufficient workforce, with adequate training and equipment to deliver the Project. However, as with all construction sites, there is the potential for workers to be exposed to heightened personal safety risks relating to workplace activities. Specific risks to the Project relate to working from heights, working with electricity and working in a desert environment (heat and dust).

With the implementation of the mitigation and enhancement measures proposed below, effects on labour and working conditions, occupational health and safety and the supply chain are anticipated to be **minor adverse (not significant)**. Effects on Gender and Gender based violence and harassment are anticipated to be minor adverse and not significant, though increased employment of women could result in a minor beneficial effect.

The following mitigation and enhancement measures have been recommended:

- A Project Implementation Unit will be set up by the Ministry of Energy to support Project implementation. The Ministry of Energy/Project Implementation Unit will:
 - Develop and implement a Project Environmental and Social policy.
 - Develop and implement a Project Human Resources policy and procedure, ensuring they are in line with national legislation and EBRD Performance Requirement 2. The policy and procedure will set out the approach to managing employees and contractors, including rights under Mongolian labour and employment law, and employee rights to join worker organisations and bargain collectively. It will provide a clear statement that the Construction Contractor will not use forced labour or employ children in a manner that is exploitative or likely to interfere with their education or be harmful to their development.
 - Develop and implement a Project Discrimination and Harassment Policy that sets out legal duties and EBRD Performance Requirement 2 in relation to preventing harassment and discrimination and ensuring a zero-tolerance process is in place for discrimination against workers; outlines acceptable behaviours; sets out the requirement for training; and outlines the requirement for a grievance mechanism to address complaints, ensuring that all parties are treated fairly and that the process is documented.
 - Develop a Project Code of Conduct, which will include measures relating gender equality and gender based violence and harassment and set out expectations in relation to local culture and drug and alcohol use, anti-social behaviour, sexual harassment, assault, and community safety.
 - Develop and implement an overarching Project Labour Management Plan, which will cover PIU staff as well as set the standard for contractors working on the Project.
 - Develop and implement a Project supply chain policy and plan, setting out the procedures for reviewing contractor tenders and prioritisation of suppliers that have strong ESG ratings and/or environmental performance certifications; assessment of labour risks such as forced and child labour, including direct allegations and entity/sanction lists; Verification of training; Inspection and auditing requirements and frequency; and key performance indicators for the supply chain
 - Ensure that the Project construction tendering process includes relevant clauses and policies related to labour and working conditions and promoting employment for women.
 - Undertake a Gender based Violence and Harassment and gender risk assessment and then develop and implement a Project Gender Equality and Gender based Violence and Harassment Action Plan, which will

include measures relating gender equality and Gender based Violence and Harassment and set out expectations in relation to local culture. The Project Implementation Unit will work with the Construction Contractor to undertake community awareness sessions in relation to Gender-based Violence and Harassment and the mechanisms available for reporting any incidents (see Grievance Mechanism below) in advance of the construction activities, including mechanisms that exist via local health organisations and the police.

- Set targets on key topics such as local employment and number of women employed and Key Performance Indicators for the Construction Contractor.
- Include the Project requirements as set out in policies and plans are included in any contractual documents for contractors.
- Approve the Construction Environmental Management Plan and associated detailed plans prepared by the Construction Contractor, including the Emergency Preparedness and Response Plan
- Provide training to PIU staff and the Construction Contractor on the above issues.
- Review contractual documents for environmental and social capability and capacity.
- Undertake labour audits to review the appointed Construction Contractor's performance.

• **The Construction Contractor will be required to:**

- Comply with the Project policies, procedures and plans, as outlined above.
- Sign up to and deliver on the Project Code of Conduct.
- Ensure employees are aware of their rights and have access to the relevant policies and procedures.
- Develop and implement a Construction Labour Management Plan in line with applicable national labour laws and EBRD Performance Requirement 2, which will include information on working conditions and entitlements, mental health, welfare facilities, training, working hours, health and safety, recruitment process and hiring procedures, and child and forced labour.
- Develop and implement a Construction ESMP and detailed management plans e.g. Traffic Management Plan.
- Develop and implement a Workers' Accommodation Management Plan. The Plan will set out requirements for monitoring of the camp against the requirements of the EBRD's Guidance Note on Workers' accommodation: processes and standards on a monthly basis as a minimum.
- Develop and implement a Supply Chain Management Plan, to ensure that all sub-contractors comply with the same requirements as the main Construction Contractor, including compliance with national legislation and EBRD requirements such as avoiding child labour or exploitative practices. Prior to engaging suppliers the Construction Contractor will undertake supply chain due diligence. Undertake regular compliance audits of the supply chain, at a frequency identified in the Supply Chain Management Plan but recommended to be at least once a year, as appropriate to the length of the supply chain contract
- Comply with the Project Gender Equality and Gender based Violence and Harassment Action Plan; and promote open discussions about Gender based Violence and Harassment concerns through disclosure of gender awareness materials; and attend / support PIU-led training on the Code of Conduct and Gender based Violence and Harassment. The Construction Contractor will also promote and develop a mentoring programme for women in the construction workforce and report on gender-disaggregated workforce numbers in construction monitoring reports in line with requirements set out in the Project Labour Management Plan.
- Develop and implement an Occupational Health and Safety Management Plan and provide workers with a safe and healthy work environment, taking account of inherent risks and specific classes of hazards associated with the Project.
- Conduct a thorough risk assessment and prepare a Construction Risk Register for the Project. This will cover working with Electric power and distribution, natural hazards and remote working. Job and task specific hazard analysis and controls will be undertaken for all activities.
- Develop, implement and disseminate an Emergency Preparedness and Response, developed in liaison with local community members, authorities, police and emergency services. This will cover the requirements of national law and EBRD Performance Requirement 4 and detail preventative measures for all incidents, including identification of potential risks and emergencies e.g. spills, fires, collisions, worker injury; roles and

responsibilities and procedures for responding to identified risks and emergencies; emergency response equipment requirements; and the location of the nearest medical treatment facilities. The Construction Contractor will identify the relevant first aid, clinical and hospital treatment points, in liaison with these providers. Project specific emergency response drills shall be carried out on a periodic basis (at least monthly). All staff must participate in these drills. Periodic emergency drills at both community and district levels will test the functionality of evacuation procedures, communication flows, first-response capacity, and stakeholder coordination mechanisms. Following every exercise and drill the Construction Contractor will conduct a debriefing/review and decide on revisions to this Plan.

- Develop and implement a Training Plan, which sets out induction, generic and job-specific training requirements and frequencies.
- The Ministry of Energy/Project Implementation Unit and the Construction Contractor will implement a zero-tolerance process for discrimination against women.
- Both the Project Implementation Unit and the Construction Contractor will appoint a Community Liaison Officer to facilitate engagement with the local communities in relation to labour opportunities; and activities to disclose employment opportunities will be undertaken in line with the Project Stakeholder Engagement Plan, as outlined earlier. A Community Grievance Mechanism will be established by both the Construction Contractor and the Ministry of Energy/Project Implementation Unit, that will be available to the general public and will be free from harm or retaliation. Anonymous reporting will be possible. The Grievance Mechanism will be widely disclosed by various means, such as local notices, meetings, via stakeholder events, etc. as outlined in the Project Stakeholder Engagement Plan.
- A Labour Grievance Mechanism will be established by both the Construction Contractor and the Project Implementation Unit. This will be disclosed to staff at induction and at periodic intervals during the construction period.

Monitoring requirements will include:

- The Project Implementation Unit will monitor the labour and occupational health and safety performance of the Construction Contractor through labour audits at least every 6 months during construction.
- The Project Implementation Unit will monitor Construction Contractor performance against key performance indicators
- The Construction Contractor will perform labour auditing during construction on a monthly basis to identify aspects such as ensuring all workers (direct and indirect) have access to the Project and any construction-specific human resources policy and procedures; reviewing whether there any gaps in payment, provision of personal protective equipment and/or any other concerns regarding human resources.
- The Construction Contractor will track and report on labour-related key performance indicators.
- The Construction Contractor will provide progress reports to Project Implementation Unit on a monthly, quarterly and annual basis.

Climate Resilience

The proposed Project route will run through Dornogovi aimag, located in southeast Mongolia within the Gobi Desert region. The area is characterised by hotter, drier conditions than the broader national climate, with some steppe land cutting through the desert landscape. Mongolia, including Dornogovi aimag, is subject extremely cold winters and hot summers. Minimum temperatures for the region average at -29.3°C, while maximum temperatures average at 37.7°C.

The future baseline conditions for the Study Area have been projected using climate data and the following climate hazards may affect the construction phase:

- Extreme heat
- Extreme cold
- Wind
- Storms
- Rainfall and flooding
- Dust storms
- Wildfire

These hazards are anticipated to impacts a range of receptors including building sites, the road networks, human health and construction equipment. However, with the implementation of mitigation measures proposed below, the overall effects are considered **not significant** in relation to extreme heat and cold, rainfall and flooding and storms, wind and dust storms and wildfire.

The following mitigation and enhancement measures have been recommended:

- Inspect equipment regularly to ensure that systems have not been damaged by climate events, including extreme heat, extreme cold, sand deposition and windblown debris.
- Provide sufficient PPE for staff to avoid impacts associated with overheating, hypothermia, storm events, flooding, and other extreme climate events.
- Ensure that electrical and mechanical systems present on site are inspected regularly to ensure they are clear of any dust or debris that may have accumulated.
- Equipment should be stored in appropriate places to avoid damage that may occur as a result of high winds and/or storm events.
- Electrical equipment should be powered down during storm events to mitigate potential impacts arising from power surges.
- Temporary flood barriers and pumps should be kept on site for use during high rainfall events to mitigate the risk of flooding.
- Dust suppression techniques should be utilised on site to mitigate the impacts associated with sand accumulation.
- Flammable materials should be stored away from structures and equipment to reduce the risk of wildfire spread.

Monitoring requirements will include:

- Monitor weather forecasts on a weekly basis and plan activities accordingly and avoid working at height during high wind speeds.

4.3 Operation Phase

Air Quality

No air quality impacts during operation have been identified.

Noise and Vibration

The operation of additional transformers and other electrical plant that are likely to be required to accommodate the new Project into the grid at the Tsagaan Suvarga substation may give rise to noise impacts at the closest noise sensitive receptors. It is assumed that anything within approximately 100 m of the assumed source noise would potentially be subject to a significant effect at night-time noise level of greater than 45dB; however, the nearest sensitive noise receptor is over 2km away from the Tsagaan Suvarga substation. Therefore, the overall noise effect during operation are anticipated to be **not significant**.

The following mitigation and enhancement measures have been recommended:

- The Tsagaan Suvarga substation will be designed relevant standards.
- Recommended that any future accommodation introduced at the Tsagaan Suvarga mine is located such that noise levels for future receptors are compliant with permissible night-time limits (and by default daytime levels), for example any future accommodation should be located at least 100m from the substation.

Biodiversity, Flora and Fauna

A maintenance track will be required along the transmission line route once operational; this likely to be informal tracks and although vegetation does not grow along tyre tracks, evidence from other transmission lines in the area show that it is established either side and between the tracks.

The bird survey results have shown a low occurrence of bird flights at collision risk height with the overhead lines, with the spring and autumn surveys reporting 12% and 21% of flights at this height respectively. Existing overhead lines smaller than those proposed within this Project are present across the landscape. It is understood the overhead lines will be spaced at least 50m apart. Spacing at this distance (and potentially further) is considered to be beneficial to allow birds time to adjust flight heights and navigate between cables of differing heights. As the landscape is open with low-lying ground, it is considered the overhead lines are clearly visible (in good weather) which further reduces any cumulative effect.

The other species group that is at risk of collision with overhead lines is bats. During the survey work, just two bat calls were recorded. There is a lack of roosting features for bats in the vicinity of the Project which suggests bats are unlikely to be foraging in the Survey Area in notable numbers. In addition, bats are likely to forage at a range of heights, and avoid collision with structures through echolocation, therefore collision by irregularly occurring bats is unlikely.

Vehicle collision impacts are possible with maintenance vehicles however, the numbers and regularity of vehicles used during maintenance is likely to be low.

Several bird species (particularly raptors and corvids) occasionally nest on pylons, with a particular preference for lattice towers as proposed within this Project. During maintenance operations, it has been known for active bird nests to be removed from pylons, causing a loss of eggs/nestlings.

Nesting birds of prey have the potential to nest on towers during the breeding season. A vehicle pass during maintenance is not considered to cause an impact, however prolonged maintenance works around a nest site does have the potential to cause disturbance.

In some circumstances, the installation of an overhead line can cause a dispersal barrier between two areas, and as such, fragment habitats however, the Project is not considered to segregate/cut-off important areas of habitat.

During operation there is a risk of accidental spillage of oils and fuels from maintenance vehicles and activities, which could lead to risk of pollution. With the exception of wildfires, the magnitude of impacts associated with maintenance worker pressures is likely to be low.

With the implementation of mitigation measures proposed below, the overall impact due to the Project operation and maintenance is expected to be **minor adverse** or **negligible (not significant)**.

The following mitigation and enhancement measures have been recommended:

- An operational ESMP should be in place for all maintenance works.
- Five areas have been identified for the installation of bird divertors, such as colour line spacers.
- Maintenance workers will be briefed on the importance of not removing or disturbing bird nests. Ideally, maintenance work should be timed to avoid the breeding season (March to August inclusive). If this is not possible, any active nests observed in pre-works checks should be left until all chicks have fledged the nest. Only once this occurs, can the maintenance works take place and the nest be removed (if required). Appropriate no-works buffers around these nests should be put in place in line with buffers described in the construction mitigation.

Monitoring requirements will include:

- An avifauna monitoring programme will be established for the Project by an experienced ecologist to monitor the effectiveness of the mitigation measures, to assess for any significant changes in priority bird species numbers and habitat usage within the project area and adjacent sensitive habitats and identify the requirement for adaptive management. This programme may be run in collaboration with protected area managers and Non-Governmental Organisations (NGOs) (e.g. Eurasian Bustard Alliance).
 - Bird surveys will be conducted during spring and autumn seasons, for the first 2 years post-construction, to ensure birds are not being significantly negatively impacted.
 - Bird corpse searches will also be undertaken along the route during spring, autumn and winter seasons, looking out for and recording any bird carcass that is found to have been electrocuted.

Landscape and Visual

Given its relative openness, the proposed Project would become a new permanent, but static, element of some parts of the landscape and impinge upon its relative remoteness and tranquillity. In many other parts, where there is existing energy infrastructure, the change brought about by the Project's presence would be much less. The characteristic of long panoramic views along open valleys and from hilltops would largely remain unaffected by the Project.

Parts of the proposed overhead line would be permanently visible to the community of Sainshand in views east, south and south-east from its edge, and from the publicly accessible areas of ridges through the town. They would not be visible, however, to all other parts of the community, including the majority of residential areas, the town centre and Shand Plaza.

Parts of the proposed overhead line would be permanently visible to the visitors to the Khan bayanzurkh mountain top in views north-west and north-east. They would, however, be approximately 13km and 20-28km away respectively in these prospects and would not at all be visible to visitors on the other publicly frequented parts of the mountain such, as the car park at the mountain's base, the stairs/paths leading to its summit and temples on its slopes, as these are all located on the opposite side of the landform from the Project.

With the proposed line of the Project's tracking between the Hiimoriin ovoo and Ulaan Tolgoi valley racehorse competition area, and the general openness of the landscape here, the proposed OHTL would be clearly visible at close quarters to users of the locations.

The Project would not however impact all of the available views from these areas, and when it is visible, most of the structures would be seen against a backcloth of other existing energy infrastructure (including other overhead lines) and occasional landform.

With the implementation of mitigation measures proposed below, the landscape character impacts are anticipated to **be minor/moderate adverse (not significant)**. The visual amenity impacts are anticipated to **be minor to moderate adverse (not significant)**.

The following mitigation and enhancement measures have been recommended:

- Detailed routing of the proposed overhead line to avoid the creation of 'wirescape' impacts where it crosses existing overhead lines.
- Micro-siting of proposed towers away from the locations where sensitive receptors reside/visit (i.e., residential areas in Sainshand, Hiimoriin ovoo and the adjacent part of the Ulaan Tolgoi valley that is used for horseraces and parts of the annual naadam sports festival).

Soils and Natural Hazards

All land used during the operation phase will have been removed from its baseline state during construction. Therefore, no additional impact on land use will occur during the operational phase.

There may be some potential for pollution of soils from rust treatment and painting of towers; and for hydrocarbons and oils to enter soil at substation sites. However, these impacts are not considered likely to be significant.

There are a number of natural hazard events that could have an impact on the Project infrastructure, including:

- Impacts on the operation of project machinery and equipment e.g. extreme cold affecting equipment operation; and
- Collapse of transmission lines e.g. due to heavy snowfall, wind speeds.

As well as having a direct potential adverse effect on Project infrastructure, the collapse of towers can result in a health and safety risk to local communities/herders as well as the maintenance staff charged with responding to the damage or staff undertaking routine maintenance, if the events are not anticipated.

With the implementation of mitigation measures proposed below, the natural hazards effects are anticipated to be potentially **significant**, depending on the management plans in place. **No significant effects** on soils have been identified.

The following mitigation and enhancement measures have been recommended:

- The final design will be developed in accordance with relevant regulations and norms, especially those with reference to weather conditions. Considerations may include increasing the tension of the transmission line to reduce wind-induced oscillation and sag monitoring techniques to proactively maintain the overhead line. Surface drainage on the substation sites should be managed to reduce water accumulation.
- Good practices should be employed for storage and handling of hydrocarbons and oils during maintenance, and for soil handling during tower and overhead line refurbishment.
- A proactive maintenance regime will be employed to ensure that potential faults are identified and repaired early.
- Maintenance activities should not be undertaken during periods of significantly adverse weather.
- Staff should be provided with appropriate PPE and provided with health and safety training.
- A Project-specific operation and maintenance Emergency Preparedness and Response Plan should be developed and implemented.

Monitoring requirements will include:

- Monitoring weather forecasts prior to undertaking maintenance work and rescheduling works where possible.

Water Environment

Towers located in or nearby watercourses has the potential to change the hydrological regime following a flood. Potentially changing the route of floodwaters to impact nearby settlements.

Pollution impact pathways to surface watercourses and groundwater would be relatively limited as land would be reinstated following completion of construction works. However, there is a risk of accidental spillage of oils and fuels from maintenance vehicles and activities, which could lead to risk of pollution of drinking water wells or the wetland.

With the implementation of mitigation measures proposed below, the water environmental risks are anticipated to be **negligible (not significant)**.

The following mitigation and enhancement measures have been recommended:

- The towers will not be located near a watercourses or have the ability to reroute flows to other areas.
- Suitable measures would be in place to reduce the risk of spills from maintenance vehicles, with appropriate spill kits and any refuelling if required away from the dry watercourses, wells or wetland.

Social and Community

In terms of wellbeing, maintenance activities could result in disturbances locally (noise, dust and vibration), especially for herders near the Project route. The Project will strengthen the reliability and stability of the transmission network which will have a positive impact on wellbeing in relation to existing users of the CES.

Risks to the general public include: risk of electrocutions, fire generation from falling overhead lines and from lightening; falling and/or swinging objects; falling of live electrical conductor due to mechanical failure of an insulator string or snapping of the conductor itself; and potential collapse of poles/towers; and electromagnetic fields. The presence, storage and use of oils, fuels and other flammable products on the premises of the substations may give rise to fire outbreaks.

It is assumed that the design of the Project will include for appropriate health and safety measures. All structures will be adequately earthed and earthing cables used. The substations will be fenced and made secure from the public, with authorised access only permitted. Warning signs stating “Do not climb! Dangerous” will be placed on the lower part of the towers adjacent to the authorised climbing area.

Electric overhead lines are considered a source of power frequency, electric and magnetic fields (EMFs), which may have a perceived health effect. The design of the Project will ensure that electromagnetic fields levels are within accepted guidelines for occupational and human health exposure and community education will be required to explain the dangers of electromagnetic fields.

The potential for incidents and accidents specifically associated with the risks of working at a substation and with overhead lines could put pressure on the capacity of emergency health care services during operation.

With the implementation of the mitigation and enhancement measures proposed below, **moderate beneficial** effects are anticipated in relation to the health and wellbeing of electricity users. **Minor adverse (not significant) to negligible (not significant)** effects are anticipated in relation to wellbeing impacts of maintenance activities; gender safety and security; impact on infrastructure and services, impacts of electromagnetic fields on nearby residents (herder households); safety and security of the general public; and effects on local infrastructure and services.

The following mitigation and enhancement measures have been recommended:

- The NPTG will undertake the following measures:
 - Project policies will be developed including an Environmental and Social policy; and a Discrimination and Harassment Policy; and a Supply Chain Policy.

- To reduce disturbances locally (noise, dust and vibration), especially for herders near the Project route, in relation to operation and maintenance activities, the NPTG will ensure that either an operation and maintenance ESMP is prepared or that the measures set out in this ESIA disclosure documents are incorporated into an existing operation and maintenance manual. In the event of an emergency, such as wind damage to the transmission line that may result in the wires being reachable by the public, there will be appropriate protocols in place to ensure rapid deployment of qualified staff to earth wires and rectify the damage.
- The substations will be made secure at all times and unauthorised persons will be kept away from the premises.
- Measures will be taken to ensure that the general public cannot climb the towers using such barriers as anti-climb barriers or barbed wire. Appropriate warning signs as required under national legislation and international best practice will be used on the towers to warn of the risk to life.
- Whilst the Project is not considered to result in a significant impact in relation to electro-magnetic fields, the design of the Project should be such to ensure that electro-magnetic fields levels are within accepted guidelines for occupational and human health exposure, in accordance with national legislation and international best practice.
- Prepare and implement a strategy for engagement with the local community and herder households on health and safety. This will cover a series of educational meetings with local communities and herder households in the aimag in relation to safety and the risks associated with higher voltage lines and refreshing local community and herder knowledge regarding restriction zone requirements. This should be undertaken immediately prior to the operation of the new line; one year following operation; and following any serious accidents or incidents.
- Develop and implement a stand-alone Gender Equality and gender based violence and harassment Action Plan, which will include training to project employees, suppliers and Contractors; and provide training to staff and suppliers on gender based violence and harassment.
- Ensure that an operational Emergency Preparedness and Response Plan is in place and implemented; and that the relevant health services have been engaged in relation to how emergencies will be addressed, with specific attention to incidents and accidents related to high voltage lines and substation. As with construction, emergency response drills will be carried out monthly at the substations. Periodic emergency drills will also be held with the local community and soum/bagh governments, to test the functionality of evacuation procedures, communication flows, first-response capacity, and stakeholder coordination mechanisms. Findings from the emergency response drills will be documented and communicated in lessons learned bulletins or shared with the relevant parties such as the regulators
- A Community Grievance Mechanism will be in place and will be disclosed to the local community. Anonymous reporting will be possible. The Grievance Mechanism will be widely disclosed by various means, such as local notices, meetings, via stakeholder events, etc. as outlined in the Project Stakeholder Engagement Plan.

Monitoring requirements will include:

- The NPTG will monitor the implementation of the Gender Equality and Gender-based Violence and Harassment Action Plan; and will maintain gender disaggregated data on staff.
- The NPTG will monitor community grievances, including Gender-based Violence and Harassment grievances.

Economy, Employment and Livelihoods

Currently, the Protect Area and the CES suffer from power grid capacity shortages reliable power supply. Whilst the Project does not increase electricity supply or distribution directly to new or existing consumers, it will complete the closed-loop system to form a circular transmission network. This will significantly improve the reliability and resilience of power supply in the CES. As such, it will contribute directly to the Government's strategy in the energy sector and in so doing, provide integral infrastructure to achieve the Government's long-term development agenda of economic growth through providing reliable energy supply to industry in the region. This will support potential development in the area, which in turn will support employment and livelihood opportunities.

Improved reliability and resilience of power supply in the CES will have a positive impact on existing businesses within Dornogovi aimag and the CES more widely, supporting growing and future demand for electricity through improving transmission capacity of the network. This could also facilitate further development in the area.

Following the completion of the construction phase of the Project, construction workers will need to find alternative employment opportunities. There will be relatively limited direct employment opportunities for operation and maintenance as it will be operated by the existing NPTG. At this stage it is not known if additional workers or contractors to supplement the existing NPTG workforce would be required. The training, qualifications and experience of the construction workforce will be valuable to the local economy.

With the implementation of mitigation and enhancement measures proposed below, effects on the regional economy and local economy and livelihoods are anticipated to be **moderate beneficial**. Effects on employment and gender will be **negligible (not significant)**.

The following mitigation and enhancement measures have been recommended:

- The Ministry of Energy and Project Implementation Unit will:
 - Work with the local developments in the area, such as the mines, to help provide for a proportion of the construction workforce to be recruited on local projects, which will benefit the local economy once the Project has been finished as skilled workers will be available to the workforce.
- The NPTG will undertake the following measures:
 - Develop and implement a Discrimination and Harassment Policy and Gender Equality and Gender based violence and harassment Action Plan, building on the Project documents developed by the Project Implementation Unit. This will cover effective implementation of the Energy Sector Gender Policy (2023-2032) approved in 2023 and its Implementation Action Plan and include measures to promote the employment of women. The NPTG will adopt gender-sensitive workplace policies to comply with the revised Labour Code.
 - Develop and implement a Project-specific Operational Human Resources policy and Labour Management Plan and disclose them to all employees. Existing documents can be updated as relevant. The Labour Management Plan will ensure that it includes for: Details of a recruitment process which is transparent and fair; Details of the employment opportunities for locals; and details of how employment opportunities will be advertised (such as advertisements on MoE/NPTG website).
 - Either update an existing Supply Chain Management Plan or, where such a plan does not exist, develop and implement a Supply Chain Management Plan to cover the operation stage, and as a minimum to cover the following: any tendering process includes clauses and policies on minimum working age, normal working hours, freedom to collective bargaining, good working conditions and eradicating risks of forced labour; labour

management clauses are included in procurement contracts; and continuous monitoring is undertaken of suppliers' performance, including risk assessments to ensure that third parties' performance follows national labour legislation and complies with EBRD PR2.

- A Community Grievance Mechanism will be in place and will be disclosed to the local community. Anonymous reporting will be possible. The Grievance Mechanism will be widely disclosed by various means, such as local notices, meetings, via stakeholder events, etc. as outlined in the Project Stakeholder Engagement Plan.
- A labour Grievance Mechanism will also be in place and disclosed to all staff during induction and on an annual basis thereafter.

Monitoring requirements will include:

- The NPTG will monitor the implementation of the Gender Equality and Gender-based Violence and Harassment Action Plan; and will maintain gender disaggregated data on staff.
- The NPTG will monitor grievances, including those related to employment and Gender-based Violence and Harassment grievances.

Land Use, Tenure and Displacement

No additional land take is required at the Sainshand and Tsagaan Suvarga substations due to the Project. The main permanent land required for the Project is associated with the construction of the tower foundations along the Project route and accommodating the 25m right of way. This has been discussed under the Construction impacts, as the requirement for land take would occur prior to construction activities.

Labour and Working Conditions

Operations and maintenance staff will be required, serviced both from within the Ministry of Energy and NPTG. It is not anticipated that an additional workforce would be required.

It is expected that the Ministry of Energy and NPTG will comply with the Mongolian Labour Code and will ensure that all employees, including both permanent and temporary employees, will be provided with a contract. If not managed, there could be impacts associated with supply chain, occupational health and safety, child and forced labour.

The NPTG does not currently monitor maintenance contractors in relation to social and labour aspects, with procurement contracts mainly focused on health and safety and technical requirements. It is expected that the maintenance contractors will most likely be Mongolian companies and will comply with the Mongolian Labour Code and will ensure that all employees, including both permanent and temporary employees, will be provided with a contract. However, if not managed, there could be impacts associated with supply chain, occupational health and safety, child and forced labour.

Occupational health and safety hazards include risk of electrocutions; fire generation from falling overhead lines and from lightening; falling and/or swinging objects; electrocution, electric shock and arc flash incidents; potential collapse of towers; falling from heights; electromagnetic fields; fire risk at substations; exposure to chemicals, hazardous or flammable materials; and potential injuries from handling heavy equipment, tools, and materials.

With the implementation of mitigation and enhancement measures proposed below, **minor adverse to negligible (not significant) effects** are anticipated in relation to Labour and working conditions, supply chain, gender-based violence and harassment and gender. With respect to occupational health and safety, effects may range from minor adverse and not significant to major adverse and significant.

The following mitigation and enhancement measures have been recommended:

- The following policies and plans will be developed and implemented by NPTG:

- Environmental and Social Policy
- Human Resources policy covering child and forced labour.
- Discrimination and Harassment Policy
- Labour Management Plan
- Supply Chain Policy
- Supply Chain Management Plan
- Labour Grievance Mechanism.
- Occupational Health and Safety Management Plan
- Emergency Response and Preparedness Plan

As appropriate, these can be integrated into existing policies and plans held by the NPTG. Employees will be made aware of the relevant plans and policies and their rights. Any contractors will also be provided with the relevant policies and plans for compliance purposes.

- Mental Health and Wellbeing Support should be integrated into the operational HR policy and labour management plan, including signposting to counselling resources and training on stress management and burnout prevention. A zero-tolerance process will be in place for discrimination against female workers. NPTG will implement a Gender Equality and gender-based violence and harassment Action Plan.
- The NPTG will align the Occupational Health and Safety Management Plan and Emergency Response and Preparedness Plan with the international standard Occupational Health and Safety Assessment Series 18001 and EBRD PR2 on Labour and Working Conditions.
- Risk assessments will be undertaken to identify physical chemical, biological and other hazards and prioritising hazard elimination, hazard control and hazard minimisation. Risk assessments should be prepared taking consideration of Briefing Note 01: Underground and overhead services¹, *Electric power and distribution health and safety toolkit*² and *Working near Overhead Cables*³; and include consideration of remote working and natural hazards. The NPTG will also assess all risks for employees arising from electromagnetic fields at the workplace and, if necessary, measure or calculate the levels of electromagnetic fields to which workers are exposed. Where necessary, an action plan should be developed. and OHS standards for high-voltage work during operation.
- The NPTG should develop a medical evacuation procedure as part of the Emergency Response and Preparedness Plan to enable injured workers to access appropriate emergency facilities. First aid facilities should be provided at the substations. Specific consideration should be given to the limited mobile phone data coverage along the alignment and the need to consider alternative to mobile phone, such as satellite phones. Emergency response drills shall be carried out on a periodic basis (at least monthly). All staff must participate in these drills. Periodic emergency drills will also be held with the community and district level administrations. Following every exercise and drill the NPTG will conduct a debriefing/review and decide on revisions to this Plan.
- The Supply Chain Management Plan will cover: adherence to Mongolian Labour Code and ILO standards; requirements for written employment contracts; ensure adequate occupational health and safety measures; set out access to grievance mechanisms. Any tendering processes will include clauses and policies on minimum

¹ Available at: [How to implement our performance requirements](#)

² Available at: [How to implement our performance requirements](#)

³ Available at: [Working_near_overhead_cables_En.pdf](#)

working age, normal working hours, freedom to collective bargaining, good working conditions and eradicating risks of forced labour; and labour management clauses will be included in procurement contracts.

- A labour Grievance Mechanism will be in place within the NPTG, for staff and contractors, and disclosed to all staff during induction and on an annual basis thereafter.

Monitoring requirements will include:

- The NPTG should conduct Annual Labour Audits to assess operational workforce conditions, including pay, working hours, contract compliance, PPE provision, and grievance uptake.
- The NPTG will undertake regular compliance audits of their supply chain, at a frequency identified in the Supply Chain Management Plan but recommended to be at least once a year, as appropriate to the length of the supply chain contract. Consideration will be given to the need for an environmental and social performance penalty mechanism for poor performance. Serious breaches should result in a halt to all activities with that supply chain.
- The NPTG should track and report on occupational health and safety key performance indicators, such as: Lost Time Injuries, Near misses, PPE compliance rates and safety training completion rates.
- The NPTG will monitor the implementation of the Gender Equality and Gender-based Violence and Harassment Action Plan; and will maintain gender disaggregated data on staff.
- The NPTG will monitor grievances, including those related to employment and Gender-based Violence and Harassment grievances.

Climate Resilience

The following climate hazards may affect the operation phase:

- Extreme heat
- Extreme cold
- Wind
- Storms
- Rainfall and flooding
- Dust storms
- Wildfire

These hazards are anticipated to impact a range of receptors including buildings and infrastructure, landscape receptors and human health, such as storm events damaging the towers and overhead lines.

With the implementation of mitigation measures proposed below, the overall effects from the identified climate hazards are considered **not significant** for extreme cold, wind, storms, extreme heat, dust storms, wildfire, and rainfall and flooding.

The following mitigation and enhancement measures have been recommended:

- A number of measures can be implemented in relation to design and operational activities, such as increasing the tension of the overhead lines; sag monitoring of the overhead lines; use of granite dust in paved areas to reduce the risk of road melt during periods of extreme heat; use of hydrophobic coatings to reduce ice and snow accumulation and mitigate impacts of heavy rainfall; consideration of increasing the tension of the lines to reduce wind-induced oscillation and utilise wind-breaks or sand fences to trap wind-blown sand and reduce the impacts

associated with windblown debris; use of lightning arresters to divert potential lightning strikes during storm events; regular inspection and maintenance of drainage infrastructure; timing of maintenance activities to avoid adverse weather conditions; utilising hydrophobic coatings; and providing maintenance workers with appropriate PPE to mitigate risks associated with extreme heat, extreme cold, and heavy rainfall events.

Monitoring requirements will include:

- Monitor weather forecasts prior to undertaking any planned routine maintenance and rescheduling activities where necessary to avoid working during adverse climate conditions.

4.4 Cumulative Impact Assessment

During construction, given the relatively remote location of the proposed route no significant cumulative effects beyond those identified by each topic are anticipated. The cumulative effects on flora and fauna such as noise, dust and disturbance were considered within the ecological assessment. No additional impacts are anticipated. Given the nature of this project, at most, a moderate to potentially major beneficial effect is anticipated in relation to construction employee expenditure on local transport, assets, hard goods and consumables.

During operation, no cumulative adverse combined effects are anticipated. The provision of a more efficient and reliable transmission network will have an overall cumulative positive effect on the economy through a combination of various impacts, including the encouragement of the provision of more renewable energy sources and development locally, which will in turn improve employment opportunities and the local economy.

No major projects are currently known to be planned in the Project Area during the construction of the Project. In the event that the Project works are undertaken at the same time as other projects, the demand for resources and services could put additional pressure on the local communities and facilities (e.g., workers, water supply, health care centres, electricity supply). The construction of several projects at the same time could also result in a cumulative effect on waste management facilities, with an increased generation of construction wastes. However, it is considered unlikely that another project will impact on the same herder households at the same time as this Project; though it is noted that expansion is currently underway at the Tsagaan Suvarga mine, but this is at the far end of the Project route, away from identified herder camps. Furthermore, as this Project will not have direct effects on the local communities, it is unlikely to result in a significant adverse cumulative effect (for example, combined effects of dust, air emissions and noise) on local communities. There is the potential for the combined total of direct and indirect impacts on the economy, employment and livelihoods, both positive and negative, could be greater if the Project is undertaken at the same time as the other projects.

During operation, the Project will result in the provision of a more efficient and reliable transmission network, which will have an overall cumulative positive effect on the economy through a combination of various impacts, including the encouragement of the provision of more renewable energy sources and development locally, which will in turn improve employment opportunities and the local economy. It is also anticipated that development may increase in the Project Area, given that the current investment in the energy sector by the Government is linked to Mongolia's Long-Term Development Policy: Vision 2050, which sets out various sector development to increase productivity. The Project will help enhance the transmission capacity of the CES, enabling technical integration of electricity generated by newly planned energy source developments; and improved electricity supply is expected to support proposed developments in the Project Area, such as the Tsagaan Suvarga copper

mine expansion, the Altanshireet Metallurgical Complex and the Zamyn Uud Free Economic Zone development. Further development can have a negative cumulative effect on the environment, pasture degradation and ultimately a decrease in traditional livelihoods.

5 Stakeholder Engagement and Grievance Mechanism

5.1 Stakeholder Engagement

A Stakeholder Engagement Plan (SEP) has been developed as part of the ESIA Disclosure Package and covers the following:

- Introduction
- Project description
- Stakeholder engagement and information disclosure requirements
- Stakeholder identification
- Stakeholder engagement
- Stakeholder engagement programme
- Grievance mechanism
- Monitoring and reporting
- Auditing and reporting
- Resources and responsibilities

The SEP defines the stakeholder engagement approach for the Project, the key identified stakeholders and how to provide feedback and how any feedback and comments are addressed. **Any stakeholders requiring to be included within the consultation process should refer to Section 7: Contacts.**

The ESIA Project Team have undertaken two phases of engagement to input to the ESIA Disclosure Package:

- An initial scoping engagement phase took place in June and July 2025 focusing on initial project introductions, clarifications and questions, information requests and the NPTG. This involved a virtual kick-off meeting with EBRD and Ministry of Energy and two in-person meetings with the Ministry of Energy and NPTG.
- A second period of engagement took place in June and July 2025, covering focus group discussions, key informant interviews and herder household surveys. The four soums of Sainshand, Saikhandulaan, Mandakh and Ulaanbadrakh were visited. A total of four focus group discussions, 35 key informant interview and 10 herder household surveys took place as well as five national stakeholder meetings.

The future Stakeholder Engagement Programme will comprise several phases as follows:

- ESIA Disclosure Phase
- Pre-construction Phase
- Construction Phase
- Operational and Maintenance Phase



The purpose of the disclosure will be to ensure that stakeholders and affected parties have the opportunity to comment on and input further into the assessment of environmental and social impacts that may occur and how the Project will avoid, minimise and/or manage these impacts; and feedback any concerns to the Project Team.

The ESIA Disclosure Package will be available both in English and in Mongolian via the EBRD website (www.ebrd.com). As this is a Category A project, documents will be available for a minimum consultation period of 120 days.

Hard copies of these documents will also be available at EBRD offices and Ministry of Energy offices in Ulaanbaatar, Mongolia. Hard copies of the Non-Technical Summary, Stakeholder Engagement Plan and Land Acquisition and Resettlement Framework will be shared with the local administrations at the aimag and soum level in Project-affected soums for perusal by interested parties. The Ministry of Energy will also publicly notify how both hard and soft copies of the Project ESIA documentation can be accessed and comments provided, including electronically and in comment books and eleven proposed public consultation events will be held, one at each bagh centre, along the proposed Project route.

Public consultation will be held in the Project soums and in Sainshand City. Further details on the dates and venues will be provided via local notices, soums and baghs administrations and other mechanisms such as Facebook once the details have been finalised.

A Public Consultation Summary Report will be prepared and disclosed following the end of 120 day disclosure period. This report will summarise received comments, issues raised, and consultations on the ESIA content, detailing any material impacts and resulting changes. Where necessary, an updated ESIA Report and associated documents will also be prepared and issued on the EBRD website; and an updated NTS provided at the aimag and soum level.

All affected people and vulnerable groups within the Project Area will be consulted regularly throughout the project lifetime, using targeted meetings and outreach as necessary. During the construction stage, the Project Implementation Unit and the Construction Contractor will disclose relevant information about the Project during the construction stage. The NPTG will be required to continue disclosure in an ongoing manner during operation of the Project.

Specifically, focus group discussions or targeted meetings will be conducted with women, the disabled, elderly and other vulnerable people to ensure that their needs and concerns are addressed in relation to the Project impacts. As necessary, this will include engagement at the affected person's residence or other location they stipulate and will consider the need for additional support, such as transportation.

5.2 Grievance Mechanism

A Grievance mechanism is set out in the Stakeholder Engagement Plan. The grievance mechanism will be open to all stakeholders to submit complaints or register concerns, and to receive and facilitate resolution of stakeholders' concerns and grievances, in particular, about the Project's environmental and social performance. It will allow the Project to be aware of and respond to stakeholders' concerns related to the Project in a timely manner. Grievances can be submitted anonymously if preferred.

The mechanism can be summarised as follows:

- A project-specific grievance channel will be set up on the Ministry of Energy website and managed by the Project Implementation Unit.
- The Construction Contractor will also set up a grievance mechanism during construction. This will be fully disclosed locally through various channels, such as meetings, noticeboards, stakeholder and community meetings; and via the Khurals and Governors.
- You will be able to log a grievance on the Ministry of Energy website or directly with the Construction Contractor.
- All grievances will aim to be acknowledged within 5 working days to the affected party (unless anonymity has been requested).
- The Construction Contractor will inform the Ministry of Energy/Project Implementation Unit of any grievances they receive.
- The Construction Contractor and the Ministry of Energy/Project Implementation Unit will work together to resolve the grievance.
- Where necessary, the Construction Contractor and the Ministry of Energy/Project Implementation will ensure the local government/officials are involved. Where applicable, a joint team with the local government/officials will be set up to investigate the grievance.
- Unless otherwise agreed with the affected party, the Ministry of Energy/Project Implementation/Construction Contractor will respond with a solution within no later than 10 working days of the Complaint Date.
- The solution will be implemented within 7 working days of the solution being agreed; or, where longer is required, within a timeframe agreed together with the affected person.

During the operation phase, grievances will be addressed by the NPTG using their existing website.

The project grievance mechanism will not prevent access to judicial or administrative remedies and, in the event a person or community does not agree with the decision, they may lodge a complaint with the courts.

6 Environmental and Social Management

6.1 Project Management and Delivery

The Ministry of Energy will be the developer of the Project, and it is likely that a Project Implementation Unit will be set up within the Ministry to oversee Project implementation during construction. Within the Project Implementation Unit, a person responsible for the Project Environmental and Social Management System (ESMS) will be appointed. This individual will be responsible for ensuring adequate training of the Project Implementation Unit staff and, where necessary, Contractor staff.

A Construction Contractor will be appointed for the construction of the Project. The Construction Contractor will be expected to undertake monitoring and inspections of their compliance with the Project ESMS documentation.

The Project Implementation Unit will undertake regular inspections and audits of the Construction Contractor to ensure compliance with the Project ESMS.

6.2 Environmental and Social Action Plan

An Environmental and Social Action Plan (ESAP) has been prepared for the Project to meet EBRD requirements. The purpose of the ESAP is to detail the objectives, actions required, responsibility for the actions to manage, limit and mitigate negative impacts (and enhance positive impacts) from the Project, programme for deliver of the actions and provision of indicators against which Project (and Contractor) performance can be measured.

The ESAP is a condition of financing from the EBRD and must be complied with. The EBRD will monitor its implementation throughout the construction and operation of the Project, for the period of financing. During construction and operation, the Ministry of Energy, Project Implementation Unit, Project staff and the Construction Contractor will be accountable for completing work in a way that is compliant with the expectations set out in the ESAP. The ESAP is designed to ensure compliance with Mongolian permitting requirements and legislation and the EBRD ESIA Disclosure Package.

6.3 ESMS and Management Plans

A Project ESMS will be prepared that will provide the framework for the Contractor's management systems. The ESMS will cover:

- Policies and procedures
- Project Environmental and Social Management Plan (ESMP)
- Legal and permit register
- Commitments register
- Roles and roles and responsibilities
- Project schedule

As part of the ESIA Disclosure Package, an ESMP has been developed. It is expected that the Project Implementation Unit will develop this in more detail prior to contracting the Construction Contractor, to reflect any additional surveys and the national EIA process – this will become the Project ESMP. The Project ESMP will form a requirement of the tender documents.

The Construction Contractor will be obliged to adopt the Project ESMS and ESMP and develop more detailed systems and plans to address construction-specific aspects of Project delivery. They will prepare a detailed Construction ESMP.

6.4 Final Route Alignment

The final route alignment will be agreed following engagement with the various land users and owner along the Project route, and factoring in micro-siting of the towers to address the measures identified in the ESIA Disclosure Package (such as the avoidance of the area of Rare and Endangered flora). Once confirmed, the NPTG will need to apply for possession rights to use the land for the Project.

6.5 Temporary Site Requirements

At the time of writing, no information is available on the location of the Contractor camps or other temporary sites such as works areas and access roads. The Construction Contractor will be required to select sites on the basis of minimal environmental and social impacts, and assess final sites chosen so that, where necessary, additional mitigation measures can be applied to reduce adverse impacts. Additional assessment of the environmental and social impacts of these sites will be required by the Construction Contractor, the approach to which is set out in the ESMP.

6.6 Site Handover

Prior to handover of the site from the Construction Contractor to the Ministry of Energy, and subsequently the NPTG, following the construction works, the Construction Contractor will be required to undertake rehabilitation of sites including all temporary works areas and removing all wastes from the Project corridor to the satisfaction of the Ministry of Energy and their Project Implementation Unit.

7 Contacts

For further information on the Project or access to the ESIA Disclosure Package, please contact the following:

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