

Sainshand – Tsagaan Suvarga Transmission Line Project

Environmental and Social Action Plan

December 2025



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Environmental and Social Action Plan

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1 Introduction

- 1.1.1 The European Bank for Reconstruction and Development (EBRD) is considering providing a sovereign loan to the Government of Mongolia to finance the construction of a 204 kilometre (km) double circuit 220 kilovolt (kV) overhead transmission line (OHTL) in Dornogovi aimag (province). The route alignment will commence with a connection to a planned substation in Sainshand (to be constructed as part of the Choir – Sainshand OHTL project) and end with a connection to an existing 220/35/22 kV substation operated by the National Power Transmission Grid (NPTG), located within a licensed mine area at the Tsagaan Suvarga mine. The 204km OHTL and substation connections are herein referred to as 'the Project'.
- 1.1.2 An Environmental and Social Impact Assessment (ESIA) of the Project against the EBRD's 2019 Environmental and Social Policy (ESP) and associated Performance Requirements (PRs) has been undertaken. This document presents the Environmental and Social Action Plan (ESAP) for the Project.
- 1.1.3 The Ministry of Energy (MoE) will be the developer for the Project. The MoE is responsible for energy policy and associated infrastructure development in Mongolia and is the Project Proponent in the context of this Project. A Project Implementation Unit (PIU) will be set up within the MoE to help deliver Project implementation. A Construction Contractor will be appointed to finalise the design and construct the Project. The National Power Transmission Grid (NPTG) will be responsible for the operation and maintenance (O&M) of the Project.

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PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	Environmental and Social Assessment Prepare General Environmental Impact Assessment (GEIA) and submit for approval by the Ministry of Environment and Climate Change. Following approval of the GEIA: <ul style="list-style-type: none"> • Prepare the Detailed EIA (DEIA) • Undertake public consultation on the DEIA • If required, update the DEIA • Submit the DEIA to the Ministry of Environment and Climate Change for approval. 	Compliance with national legislation.	Law on EIA (1998, as amended).	EBRD – national EIA Consultant.	Prior to construction.	Approval of GEIA. Public consultation held. Approval of DEIA.	
1.2	Environmental and Social Assessment Incorporate ESAP, Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP) mitigation, management and monitoring measures and permit requirements into contractual arrangements with the Construction Contractor. Prepare a detailed summary of all environmental and social (E&S) mitigation measures including from ESIA into Commitments Register, segregating Company versus Contractor responsibility for each commitment. The Construction Contractor must follow the Project ESIA/ESMP/ESAP and Commitments Register.	Compliance of the contractors with EBRD PRs.	EBRD PR1 to PR10 excluding PR7 & PR9.	MoE/PIU.	Prior to issuing Construction Contractors invitation to tender.	Invitation to tender with incorporated ESAP, ESIA and ESMP mitigation measures, permit requirements and Commitments Register. This will include as a minimum the requirement for the contractor to address the following: <ul style="list-style-type: none"> • Adopt Project Environmental and Social management system (ESMS) and Occupational Health and Safety (OHS) management system and policies and ESMP, including any surveys, monitoring 	

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						<p>and/or due diligence required.</p> <ul style="list-style-type: none"> • Develop, implement and maintain detailed Construction ESMP (CESMP). • Obtain necessary permits and maintain permits/register. • Develop detailed Construction Stakeholder Engagement Plan (CSEP). • Report on Environmental and Social Management System (ESMS) and Occupational Health and Safety (OHS) performance to the MoE/PIU during the contract period, at least monthly or to a frequency as agreed between the parties. 	
1.3	<p>Environmental and Social Assessment</p> <p>Ensure the design measures set out in the ESIA, ESMP and this ESAP are incorporated into the final implemented design. This includes climate resilience (1.16), ecological (6.3 and 6.4) and health and safety (section 4) design measures.</p> <p>Adopt a change management procedure that triggers additional or new E&S assessment for changes to Project components such as route and location changes, especially if outside ESIA study corridor that has been assessed as part of the EBRD ESIA and/or DEIA.</p>	Compliance of the design with EBRD PRs.	EBRD PR1 to PR10 excluding PR7 & PR9.	MoE.	<p>Design measures - Prior to construction.</p> <p>Change management - Prior to any material project changes (route deviations or site changes).</p>	<p>Incorporation of recommended health and safety, climate resilience and ecological measures into final design.</p> <p>Any new or additional E&S assessments submitted to EBRD for no objection with explanation of material change that triggered such assessment.</p>	

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	The DEIA and ESIA Disclosure Package, including the ESMP, will form part of Construction Contractor's contract. Any deviations from these accepted recommendations must be agreed in advance with EBRD.					Final design provided to EBRD for review and no objection approval.	
1.4	Environmental and Social Assessment For any temporary areas of land required for the construction period (e.g. construction compound, Workers' accommodation camp), the Construction Contractor will implement the E&S screening checklist in the ESMP. Where any significant impacts are identified, in the first instance modification of the site location should be sought. Where this is not possible, further detailed E&S assessment should be undertaken and mitigation measures identified to reduce any significant E&S impacts.	Compliance of the contractors with EBRD PRs.	EBRD PR1 to PR10 excluding PR7 & PR9.	Construction Contractor.	Prior to construction.	E&S screening report, and any subsequent assessment reports, submitted to EBRD and PIU for no objection approval.	
1.5	Environmental and Social Management Systems (ESMS) Develop and implement an integrated ESMS that includes Occupational Health and Safety (OHS). The ESMS should meet objectives of ISO14001 and ISO 45001 but does not need to be certified. The ESMS will include: <ul style="list-style-type: none"> • Project related environmental and social policies and procedures • ESIA Report and GEIA/DEIA • Project ESMP • Legal and Permit Register • Commitments Register • Project Stakeholder Engagement Plan (SEP) 	Optimisation of ESMS management through a formalised system. Ensure appropriate Organisation Capacity and Competency.	EBRD PR1. Good international practice. ISO 14001. ISO 45001.	MoE/PIU/NPTG.	ESMS - develop prior to construction for issue to contractors. Review of compliance of contractors during construction. O&M ESMS - prior to handover/ operation by the NPTG.	For construction: Develop and implement integrated Project ESMS. Development of project policies within ESMS. Legal and permit register. Commitments register. ESMS to be followed by all contractors. Project Code of Conduct signed by all contractors and sub-contractors working on the Project. MoE Project delivery organogram. Named personnel for roles for oversight and monitoring Contractors, including name	

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	<ul style="list-style-type: none"> Project Land Acquisition and Resettlement Framework (LARF) Project Labour Management Plan MoE and NPTG roles and responsibilities including those of the PIU consultant and the Supervision Engineer Project schedule/programme to monitor and manage future activities <p>Clear roles and responsibilities will be identified. Relevant requirements during construction should be made the responsibility of contractors and monitored by the PIU. During operation they will be the responsibility of the NPTG.</p>					<p>and roles of Construction Supervision Engineer and PIU.</p> <p>Appointment of qualified ESMS lead for the Project within MoE/PIU.</p> <p>For operation:</p> <p>Develop and implement integrated Project ESMS or integrate the relevant requirements into existing O&M manuals.</p> <p>Legal and permit register.</p> <p>NPTG Project operation organogram.</p> <p>Appointment of qualified ESMS lead for the Project within NPTG, or appropriate training of existing ESMS/E&S staff.</p>	
1.6	<p>Environmental and Social Policy</p> <p>Develop Project policies and Code of Conduct within Project ESMS, covering as minimum:</p> <ul style="list-style-type: none"> Environmental and Social policy Human resources policy (covering labour and working conditions and community health and safety and gender) Contractor/Supplier policy Project Code of Conduct - to include prohibition of any construction worker using herder wells Discrimination and Harassment Policy <p>Contractors and sub-contractors shall be required to comply with Project policies.</p>	To ensure delivery of the Project across contractors in compliance with EBRD PRs.	EBRD PR1, PR2, PR4. Good international practice.	MoE/PIU.	<p>Developed prior to construction and implemented during construction.</p> <p>Review of compliance of contractors during construction.</p>	Policies developed and integrated into Project ESMS.	

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1.7	Environmental and Social Policy Develop Project policies, covering as minimum: <ul style="list-style-type: none"> Environmental and Social policy Human resources policy (covering labour and working conditions and community health and safety and gender). Ensure employees and suppliers have access to human resources policies and are aware of their rights to a trade union. Discrimination and Harassment Policy Supply Chain Policy and Management Plan. The supply chain and contractors shall be required to comply with NPTG policies.	To ensure delivery of the Project in compliance with EBRD PRs.	EBRD PR1, PR2, PR4. Good international practice.	NPTG.	Developed prior to O&M and implemented during operation.	Policies developed and integrated into Project ESMS or integrate the relevant requirements into existing O&M manuals.	
1.8	Construction ESMS, Policies and ESMP Implement the Project ESMS. Comply with Project Environmental and Social Policies. Comply with the Project Code of Conduct and ensure that it is signed by all contractor staff and sub-contractor staff working on the Project. Develop and implement detailed Construction ESMP (CESMP), comprising specific management plans and associated monitoring requirements, as set out below. The management plans should, as necessary, identify impacts of proposed location of construction camps and any temporary works areas including any haul/access roads. The specific plans to be prepared as a minimum include:	Optimisation of ESMS though a formalised system. Contractor management.	EBRD PR1, PR3, PR4. Good international practice.	Construction Contractor (and any of their sub-contractors).	Developed and approved prior to construction on site. Maintain permanently during construction.	Develop detailed CESMP/detailed plans, approved by MoE/PIU. CESMP/detailed plans provided to EBRD for review as required. Implement CESMP and report through monthly, quarterly and annual reporting to the PIU. Training records available on aspects of the Code of Conduct, including GBVH – see PR2. Signed Code of Conduct by all contractor staff and sub-contractor staff. Grievances related to Code of Conduct.	



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	<ul style="list-style-type: none"> Construction Risk Assessment and Register Air Quality Management Plan Noise and Vibration Management Plan Traffic Management Plan (on and off construction site areas) Water, Wastewater and Drainage Management Plan Materials Use and Waste Management Plan Hazardous Materials Management Plan Pollution Prevention Plan Spill Prevention and Response Plan Cultural Heritage Management Plan and Chance Finds Procedure Cultural Heritage Management Plan Labour Management Plan (including construction camps, temporary workers' accommodation camp(s), and Gender Based Violence and Harassment (GBVH)) Local Employment and Procurement Policy and Plan Supply Chain Management Plan Biodiversity Management Plan (see PR6) Occupational Health and Safety (OHS) Plan Community Health, Safety and Security Management Plan Influx Management Plan Workers' Camp Management Plan Security Plan Training Plan – see Note 1 						

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	<ul style="list-style-type: none"> Soil Storage and Site Reinstatement Plan Emergency Preparedness and Response Plan If required, following pre-construction surveys, resettlement action plan (RAP) and/or livelihood restoration plan (LRP) (see PR5) <p><i>Note 1.</i></p> <p><i>Regular training and communication should be undertaken with workers on understanding GBVH risks in affected communities.</i></p> <p><i>Training is also required on the Code of Conduct. Construction workers will be expected to abide by this Code, including zero tolerance for sexual harassment, exploitation and abuse, and reporting channels available.</i></p> <p>For labour grievance mechanism see PR2. For stakeholder engagement and community grievance mechanism, see PR10.</p>						
1.9	O&M Environmental and Social Management Plan (ESMP) Develop and implement an O&M ESMP.	Optimisation of ESMS management through a formalised system.	EBRD PR1, PR3, PR4. Good international practice.	NPTG.	Develop prior to operation. Maintain permanently during operation.	Develop detailed O&M ESMP. Plans provided to EBRD for review and no-objection approval.	
1.10	Permits Overarching Legal and Permit register to be developed by the PIU and provided to Construction Contractor to elaborate. PIU to monitor Construction Contractor to ensure permits are in place and their compliance with permit requirements. NPTG to maintain an O&M Legal and Permit register and ensure permits remain up-to-date.	Compliance with EBRD PRs and Mongolian legislation.	EBRD PR1. Mongolian legislation.	Pre-construction: MoE/PIU. O&M: NPTG.	PIU - Develop prior to start of construction. NPTG - Maintain Project permit register up-to-date during O&M.	Pre-construction - Project Legal and Permit Register. O&M – Maintain Legal and Permit Register and a record of permits obtained.	

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1.11	Construction Permits Ensure the Project Legal & Permit Register has been elaborated for construction and relevant permits are in place. Ensure compliance with permit requirements for relevant construction activities. All necessary permits to be in place prior to the start of permitted activities (e.g. water abstraction permit, batching plant, construction workers' accommodation camp(s), etc.).	Compliance with EBRD PRs and Mongolian legislation.	EBRD PR1. Mongolian legislation.	Construction Contractor.	Maintain Permit Register up-to-date during construction.	Obtain permits. Maintain Construction Legal and Permit Register. Keep a record of permits obtained and any associated reports that need to be submitted to regulators. Maintain evidence of compliance with permits (e.g. reports/audits).	
1.12	MoE Project Organisational Capacity and Commitment Ensure person(s) responsible for ESMS performance are appointed, including PIU and the Engineering Supervision Roles organisation: <ul style="list-style-type: none"> PIU – as a minimum, an ESMS lead and a Health and Safety (H&S) lead. Other roles include a Community Liaison Officer (CLO), Environmental Supervisor, Supply Chain Manager and Social Specialist. Construction Supervision Roles – as a minimum, Construction Supervision Engineer, site staff 1x E&S lead and 1x H&S lead. 	Ensure appropriate Organisation Capacity and Competency.	EBRD PR1, PR2. Good international practice.	MoE/PIU.	Prior to start of construction.	Named personnel for roles within PIU and Construction Supervision Roles.	
1.13	Contractor Organisational Capacity and Commitment Provide sufficient staffing to manage the ESMS performance of the construction phase. This will include as a minimum: <ul style="list-style-type: none"> ESMS Lead E&S Lead and support staff on site (x2 minimum) 	Ensure appropriate Organisation Capacity and Competency.	EBRD PR1, PR2. Good international practice.	Construction Contractor.	Prior to start of construction.	Appointment of qualified Contractor personnel as listed, approved by MoE / PIU Consultants and Construction Supervision Engineer. Named personnel for roles.	

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	<ul style="list-style-type: none"> H&S Lead and support staff on site staff (x2 minimum) Community Liaison Officer (CLO) Traffic marshals – for construction activities that take place above or require management of traffic on paved and unpaved roads <p>This will also include, as specific to the works being undertaken, the following:</p> <ul style="list-style-type: none"> Ecological Clerk of Works Cultural Heritage Specialist Noise and vibration specialist Air quality specialist 						
1.14	<p>Supply Chain Management</p> <p>The MoE/PIU will develop and implement a Project supply chain policy and Project Supply Chain Management Plan to manage planning and performance of construction and operational supply chain.</p> <p>These will as a minimum cover:</p> <ul style="list-style-type: none"> Inclusion of relevant ESAP requirements in contracts/subcontracts. Review of contractor tenders and prioritisation of suppliers that have strong ESG ratings and/or environmental performance certifications. Review of contractor policies, procedures and plans upon selection and appointment. Assessment of labour risks such as forced and child labour, including direct allegations and entity/sanction lists. Verification of training and/or proper credentials for contractor staff/managers responsible for ESMS. 	Contractor/Supply chain management.	EBRD PR1, PR2.	MoE/PIU/Construction Supervision Engineer.	Pre-construction and construction:	<p>Supply Chain Management Plan and risk assessment.</p> <p>Tender reviews.</p> <p>Contract documents with relevant E&S clauses.</p> <p>Contractor audit/inspection reports at least every 6 months.</p>	

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	<ul style="list-style-type: none"> • Inspection and auditing requirements and frequency. • Key performance indicators (KPIs) for the supply chain. <p>The MoE/PIU will include in the Project construction tendering process clauses and policies on minimum working age, normal working hours, freedom to collective bargaining, good working conditions, supply chain management, and measures to eradicate forced labour risks.</p> <p>The MoE/PIU/Construction Supervision Engineer will arrange independent audits and inspections of the construction sites and construction compounds at least every 6 months to ensure compliance with: the Construction Contractor's Labour Management Plan and ESMP; national legislation; and applicable ILO standards and recommendations. Monitoring and management of contractor performance will include:</p> <ul style="list-style-type: none"> • Review of contractor experience as part of the procurement process, including: consideration of language barriers in the case of migrant workers and how this would be managed on site; and Contractor environmental and social performance credentials, including ESMS staff capacity and capability; • Ensure all contractors have human resources policies and procedures on minimum working age, normal working hours, freedom to collective bargaining, good working conditions and eradicating risks of forced labour; • Ensure all contractors have an employment contract for all permanent and temporary employees in accordance with the Labour Code; 						

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	<ul style="list-style-type: none"> Ensure that all permanent and temporary employees have a copy of their signed contract; and Ensure that training on specific Project requirements is being undertaken. 						
1.15	Supply Chain Management The Construction Contractor will: <ul style="list-style-type: none"> Comply with the Project Supply Chain Policy and Plan; Develop and implement a construction-specific Supply Chain Management Plan, aligning with the Project 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 PRs. Perform supply chain due diligence through monthly inspections/obtain the third-party supply chain due diligence reports to verify potential suppliers' credentials regarding the occurrence of forced labour child labour or occupational health and safety failures. Report on KPIs monthly. 	Contractor/Supply chain management.	EBRD PR1, PR2.	Construction Contractor.	During construction.	Construction-specific Supply Chain Management Plan. Supply Chain Audit reports. Report on KPIs monthly to the PIU or their nominated organisation e.g. the Construction Supervision Engineer.	
1.16	Supply Chain Management The NPTG will develop and implement a Supply Chain Management Plan specific to the O&M phase, and as a minimum to cover the following: <ul style="list-style-type: none"> Adhere to Mongolian Labour Code and ILO standards; Provide written employment contracts; Ensure adequate OHS measures and access to grievance mechanisms 	Contractor/Supply chain management.	EBRD PR1, PR2.	NPTG.	During operation.	O&M-specific Supply Chain Management Plan. Supply Chain Audit reports at least once a year.	

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	<ul style="list-style-type: none"> Ensure that 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; and Include labour management clauses (as specified in bullet point above) in procurement contracts. <p>The NPTG will 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. 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.</p>						
1.17	<p>Construction Monitoring and Reporting</p> <p>Verification of training and professional qualifications for Contractor ESMS managers and staff.</p> <p>Review of Contractor's detailed CESMP, CSEP, policies and practices upon selection and appointment.</p> <p>Conduct monthly audit/inspection of Contractors' ESMS performance, including inspections of Contractors' construction works and accommodation camps with action tracking and feedback loop to Contractor.</p> <p>Set up and maintain an ESMS incident reporting procedure to maintain records of annual monitoring, accidents and incidents. The procedure must be overarching, unique and integrated for the Project and used by all contractors.</p>	<p>ESMS assessment of ESMS performance against EBRD PRs.</p> <p>Contractor/supply chain management.</p> <p>To record incidences and apply lessons learned.</p>	<p>EBRD PR1 to EBRD PR10 excluding PR7 & PR9.</p> <p>Good international practice.</p>	MoE/Construction Supervision Engineer (on site)/PIU.	Ongoing during construction (monthly, quarterly and annually).	<p>Monthly inspection reports.</p> <p>ESMS incident report.</p> <p>Submission of reports to EBRD on ESMS performance on schedule and in a mutually agreed format, as a minimum every six months during construction.</p> <p>Submission of Annual Environmental and Social Report (AESR) to EBRD during Project life.</p>	

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	Submit reports to the EBRD on ESMS, including status of each ESAP action and other agreed activities including resolution of grievances associated with the project.						
1.18	Contractor Construction Monitoring and Reporting Provide regular reports on performance to MoE/PIU and Construction Supervision Engineer during construction. Provide ESMS incident reporting in accordance with Project procedure. Identification of corrective actions procedure.	Continual assessment of ESMS performance against EBRD PRs. To record incidences and apply lessons learned.	EBRD PR1 to EBRD PR10 excluding PR7 & PR9.	Construction Contractor.	Monthly, quarterly and annually during construction.	ESMS incident reports. Submission of reports on ESMS compliance on schedule and in a mutually agreed format to MoE/Construction Supervision Engineer/PIU. Construction Contractor reports sufficient to allow MoE/PIU/Construction Supervision Engineer to include relevant data in reports to the EBRD, and to allow evaluation of need for corrective actions.	
1.19	Climate Resilience The following measures should be incorporated into the design, as appropriate: <ul style="list-style-type: none"> Implement overhead line sag monitoring techniques regularly to assess and proactively manage sagging. Utilise granite dust in paved areas to reduce the risk of road melt during periods of extreme heat. Plant indigenous heat, fire, and drought resistant vegetation. Utilise hydrophobic coatings to reduce ice and snow accumulation and mitigate impacts of heavy rainfall. Consider increasing the tension of the OHTL to reduce wind-induced oscillation and utilise wind-breaks or sand fences to trap wind-blown sand 	Compliance with EBRD PRs	EBRD PR1.	MoE/PIU/NPTG/Construction Contractor.	Materials included in bill of quantities prior to construction.	Approved by MoE/PIU/NPTG. Available Bill of Quantities.	

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	<p>and reduce the impacts associated with windblown debris.</p> <ul style="list-style-type: none"> Consider installing sand fences to reduce sand accumulation around assets and reduce the risk of arcing. Consider installing current-limited fuses to allow for automatic interruption of power flow should overheating occur, mitigating the risk of arcing and minimising fire risk. Consider implementing lightning arresters to divert potential lightning strikes during storm events. <p>Contractor to demonstrate a clear preference for sustainable materials within the Bill of Quantities (BOQ), including products which reduce embodied emissions and materials with higher recycled content, providing that this does not impact the safety or integrity of the Project.</p>						
1.20	<p>Climate Resilience</p> <p>The following measures should be applied during construction:</p> <ul style="list-style-type: none"> 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 any HVAC systems present on site are inspected regularly to ensure they are clear of any dust or debris that may have accumulated. Store equipment away from trees or structures when not in use to avoid 	Compliance with EBRD PRs	EBRD PR1.	Construction Contractor.	During construction.	Measures implemented during construction. Inspection reports.	

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	<p>damages that may occur as a result of high winds and/or storm events.</p> <ul style="list-style-type: none"> • Store equipment away from water bodies when not in use, to avoid the risk of damage as a result of flooding. • Monitor weather forecasts on a weekly basis and plan activities accordingly. Avoid working at height during high wind speeds. • Ensure electrical equipment is powered down during storm events to mitigate potential impacts arising from power surges. • Keep temporary flood barriers and pumps on site for use during high rainfall events to mitigate the risk of flooding. • Utilise dust suppression techniques on site, to mitigate the impacts associated with dust /sand accumulation. • Store flammable materials away from structures and equipment to reduce the risk of wildfire spread. 						
1.21	<p>The following measures should be applied during operation:</p> <ul style="list-style-type: none"> • Remove flammable materials and vegetation from the area to reduce the risk of wildfire and create fire breaks. • Monitor weather forecasts prior to undertaking any planned routine maintenance and reschedule activities where necessary to avoid working during adverse climate conditions. • Regularly inspect and maintain drainage infrastructure to avoid water attenuation. • Where possible, avoid carrying out maintenance activities during periods of 	Compliance with EBRD PRs	EBRD PR1.	NPTG.	During operation.	Inspection reports.	

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	<p>extreme heat or cold, heavy rainfall / flood events, or during high wind speeds.</p> <ul style="list-style-type: none"> Provide maintenance workers with appropriate PPE to mitigate risks associated with extreme heat, extreme cold, and heavy rainfall events. 						
PR2	Labour and Working Conditions						
2.1	<p>Human Resource (HR) Policies and Working Relationships</p> <p>Develop and implement a Project HR Policy and Procedure in line with national legislation, applicable ILO standards and recommendations and EBRD PR2. The policy and procedure should 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. The documents should 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.</p> <p>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. The Project Labour Management Plan will include measures such as:</p> <ul style="list-style-type: none"> Approach to managing the workforce, including third party and supply chain Management of worker relationships Access to worker's organisations Human rights and GBVH (see 2.6 for further details) 	<p>To ensure management of workforce in line with EBRD requirements and Mongolian Labour Code.</p> <p>Provision of equal opportunities and improving economic prospects of local residents.</p>	<p>EBRD PR2.</p> <p>Mongolian Labour Law.</p> <p>Good international practice.</p>	MoE/PIU.	<p>HR policy and Procedure developed and adopted prior to construction activities commencing and implemented throughout construction.</p> <p>Overarching Project Labour Management Plan developed and adopted prior to construction activities commencing.</p> <p>Contractor policies/ procedures reviewed/ approved: prior to work on-site.</p>	<p>HR policy and Procedure developed prepared and implemented.</p> <p>Overarching Project Labour Management Plan prepared and implemented.</p> <p>Project policies and plans compliant with EBRD PR2 and the Labour Code.</p> <p>Inspection reports prepared by the PIU (or their representatives) at least every 6 months during construction to monitor the Construction Contractor's performance against Project requirements, national legislation and applicable ILO standards.</p> <p>PIU Labour grievance mechanism maintained and demonstration of continuous improvement.</p> <p>Targets and KPIs shared with EBRD for review. Agreed Targets and KPIs set out in contractor tender documentation.</p>	

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	<ul style="list-style-type: none"> Working conditions and terms of employment Child labour and forced labour and ensuring procurement avoids exploitative practices and child labour Equal opportunities and non-discrimination Occupational health and safety Bribery and corruption Oversight provided of contractor policies/procedures Access by all workers to policy/procedures in their language(s) Arrangement for inspections Provision of a transparent and fair recruitment process Ensure that contractors employ special measures of protection or assistance to remedy past discrimination or promote local employment opportunities, such as ensuring that applications are received from under-represented groups such as women Ensure that training opportunities are provided on technical, health and safety and manual work, where suitable Integrate Mental Health and Wellbeing Support into the Labour Management Plan, including signposting to counselling resources and training on stress management and burnout prevention. <p>Targets will be set in the Plan on key topics such as local employment and number of women employed and Key Performance Indicators (KPIs) will be set to track and report on indicators such as the percentage of local hires, the percentage of female or other</p>					<p>Tender documentation to be provided to EBRD for review and no-objection approval.</p> <p>Evidence of contractor KPIs monitored for compliance and reviewed quarterly and annually by the PIU.</p>	

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	<p>under-represented groups. Local recruitment goals for tender documents should be set to encourage contractors to hire local workers, with preference for those who may be directly affected by noise, dust, construction/maintenance traffic, or other project activities. This may include local supply chain and provision for purchase of goods from local herder households.</p> <p>The Project Labour Management Plan should be developed in accordance with the EBRD Non-discrimination and Equal Opportunity Guidance for clients¹ and ensure effective implementation of the Energy Sector Gender Policy (2023-2032) approved in 2023 and its Implementation Action Plan².</p>						
2.2	<p>Human Resource (HR) Policies and Working Relationships.</p> <p>Conduct a monthly independent labour audit of the Construction Contractor against PR2 requirements; and report on those findings.</p> <p>This will include ensuring that the Contractor implements GBVH requirements including:</p> <ul style="list-style-type: none"> Setting out behaviours expected of workers along with those which are not permitted by adopting Code of Conduct on GBVH; Providing inductions to all employees and contractors/sub-contractors on GBVH requirements; Providing training to all HR and other relevant personnel on how to respond 	To ensure management of workforce in line with EBRD requirements and Mongolian Labour Code.	EBRD PR2. Mongolian Labour Law.	MoE/PIU.	During construction.	Monthly labour audit report.	

¹ Available at: [bing.com/ck/a?!&&p=753ada2c683df0accc7c9e395435ded21ae989b1dc34bea493fe0648d2c098bdJmItdHM9MTc2NTE1MjAwMA&ptn=3&ver=2&hsh=4&fclid=0d1bc705-5b79-6820-052d-d3aa5a996913&psq=EBRD+equal+opportunity+and+non-discrimination+guidance+note&u=a1aHR0cHM6Ly93d3cuZWJyZC5jb20vZG93bmxxvYWRzL2Fib3V0L3N1c3RhaW5hYmlsaXR5L05vbKRpc2NyaW1pbmF0aW9uLnBkZg&ntb=1](https://www.bing.com/ck/a?!&&p=753ada2c683df0accc7c9e395435ded21ae989b1dc34bea493fe0648d2c098bdJmItdHM9MTc2NTE1MjAwMA&ptn=3&ver=2&hsh=4&fclid=0d1bc705-5b79-6820-052d-d3aa5a996913&psq=EBRD+equal+opportunity+and+non-discrimination+guidance+note&u=a1aHR0cHM6Ly93d3cuZWJyZC5jb20vZG93bmxxvYWRzL2Fib3V0L3N1c3RhaW5hYmlsaXR5L05vbKRpc2NyaW1pbmF0aW9uLnBkZg&ntb=1)

² Order by the State Secretary of the MoE. Order No. B/3516, 20 October 2023.

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	<p>to allegations of GBVH in the workplace;</p> <ul style="list-style-type: none"> Implementing a confidential grievance mechanism for making reports (including anonymous reports) on sexual harassment. 						
2.3	<p>Human Resource Policies, Working Relationships, Wages, benefits, and Conditions of Work</p> <p>The Construction Contractor will comply with all Project HR policies and Plans.</p> <p>The Construction Contractor will develop and implement a Labour Management Plan that aligns with the Project Labour Management Plan. This should cover all employees, contractors and sub-contractors, and incorporate into contractual arrangements with employees and contractors, to include measures to:</p> <ul style="list-style-type: none"> Ensure that Project and Contractor policies and policies are documented and communicated to all employees. Ensure that proposed working conditions, including wage and benefit entitlements, working hours, and safe working practices, are documented and communicated to all employees. Ensure the provision of a flexible working regime, where practicable, for workers who may prefer to work from home due to health issues, childcare, home schooling, etc. without fear of victimisation. Ensure that mental health is covered during workers inductions and that information is provided on how to seek help from local specialists, if required. 	<p>To ensure management of workforce in line with EBRD requirements and Mongolian Labour Law.</p> <p>Provision of equal opportunities and improving economic prospects of local residents.</p> <p>To ensure welfare of workers during site preparation and construction activities.</p>	<p>EBRD PR2.</p> <p>Good international practice.</p>	Construction Contractor.	Prior to and during construction.	<p>Construction Contractor Labour Management Plan and Local Employment and Procurement Policy and Plan in place and approved by the PIU.</p> <p>Evidence of advertisements for available job vacancies across various media.</p> <p>Evidence of meeting local population recruitment targets.</p> <p>Monthly monitoring reports to PIU on Labour KPIs, such as numbers of local residents employed; number of women employed; number of project-affected persons and herders employed.</p>	

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	<ul style="list-style-type: none"> • Ensure that a zero-tolerance process is in place for discrimination against workers. • Ensure that all workers (including Construction Contractor and sub-contractors) have employment contracts. • Promote employment on the basis of non- discrimination, ensuring that applications are received from under-represented groups such as women. • Ensure arrangements are in place for construction workers so that they have access to welfare facilities such as toilets and shaded and/or heated locations for breaks on construction sites. • Ensure training opportunities are provided on technical, health and safety and manual work, where suitable. • Set out the recruitment process and hiring procedure, including identifying construction recruitment needs and staffing requirements; developing and reviewing job descriptions in a standard template; how employment opportunities will be advertised (using measures such as advertisements on MoE and Contractor websites, on soum and bagh governor offices bulletin boards, Facebook, Television and providing information to the soum and bagh meetings); the interview and selection process; and skills and capability testing (where appropriate e.g. for Equipment drivers/operators, before starting work) performing reference checks where references are available. 						

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	<ul style="list-style-type: none"> Ensure risk insurance policies availability triggered automatically. Set out the KPIs that will be met, in line with the overarching Project Labour Management Plan. <p>Develop and implement 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.</p> <p>Where sub-contractors are used, include local recruitment goals for tender documents to encourage hire of local workers. This may include local supply chain and provision for purchase of goods from local herder households.</p>						
2.4	<p>Workers' Accommodation</p> <p>Provide Workers' Accommodation Management Plan covering strategy and principles, in accordance with EBRD guidance for workers' accommodation camps.</p> <p>Identify a suitable location of accommodation and obtain any necessary permits. Ensure accommodation is at least 1km from sensitive receptors such as the herder household camps along the Project route (unless otherwise agreed voluntarily by the herder household).</p> <p>Adopt Project Code of Conduct to be signed by all workers and ensure all personnel are trained in the Code.</p>	To ensure welfare of workers.	<p>EBRD PR2.</p> <p>Good international practice.</p> <p>Workers' accommodation: processes and standards - ¹A guidance note by IFC and the EBRD.</p>	Construction Contractor.	<p>Contractor document prior to construction of workers' accommodation, or camp being accommodated by workers.</p> <p>Ongoing implementation during construction.</p>	<p>Necessary permits in place.</p> <p>Workers' Accommodation Camp Management Plan in place.</p> <p>Camp set up and maintained in compliance with EBRD requirements and is at least 1km from herder household camps (unless otherwise agreed voluntarily by the herder household).</p> <p>Code of Conduct in place and evidence of training of personnel in the Code.</p> <p>Monthly inspection of the camp and inspection reports prepared for issue to PIU.</p> <p>Project Code of Conduct to be signed by all workers</p>	

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2.5	Workers' Accommodation Review constructors' labour accommodation strategy and principles. Review of Contractor's monthly camp inspection reports. Undertake 6-monthly camp inspections or if issues are identified through review of the Contractor's inspection reports.	To ensure welfare of workers.	EBRD PR2.	MoE/PIU.	Prior to and during construction.	Camp/accommodation inspection monitoring reports on a 6-monthly basis or if issues are identified through review of the Contractor's inspection reports.	
2.6	Labour and Working Conditions The MoE/PIU will develop a Project Gender Equality and GBVH Action Plan based on a completed GBVH and gender risk assessment. This will include measures to promote the employment of women such as gender considerations in bidding documents so that each contracting company is expected to meet them at all stages of the project implementation; and include training to project employees, suppliers and contractors on GBVH associated risks. It will also include procedures for avoiding gender bias in recruitment and gender-based violence and harassment in the workplace. KPIs will be set, for example, in relation to increasing the number of women working in the construction sector and the number of GBVH cases; and require all contractors to reflect this in their policies and operations. In contexts where risks of GBVH may be greater, additional measures and protection may need to put in place. The MoE/PIU will promote open discussions about GBVH concerns through disclosure of gender awareness materials/training and implementation of effective and support the Construction Contractor in the delivery of training on GBVH to the construction workforce.	Provision of equal opportunities and improving economic prospects of local residents.	EBRD PR2. Good international practice.	MoE/PIU.	Pre-construction/ construction.	GBVH/Gender risk assessment. Project Gender Equality and GBVH Action available. Project KPIs set. Monitoring of grievance mechanism for GBVH related incidents GBVH training provided to PIU staff on induction and provided annually thereafter, with a review of the need for additional training following reports of an incident. Support to Construction Contractor on GBVH training.	

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2.7	<p>Labour and Working Conditions</p> <p>The Construction Contractor will:</p> <ul style="list-style-type: none"> Comply with the Project Gender Equality and GBVH Action Plan. All staff members will sign the Code of Conduct. Promote open discussions about GBVH and SEAH concerns through disclosure of gender awareness materials. Attend / support PIU-led training on the Code of Conduct and GBVH. Promote and develop a mentoring programme for women in the construction workforce. Report on gender-disaggregated workforce numbers in construction monitoring reports in line with requirements set out in the Project Labour Management Plan. <p>The Construction Contractor will also work with the PIU to:</p> <ul style="list-style-type: none"> Undertake community awareness sessions in relation to GBVH and the mechanisms available for reporting any incidents (see Grievance Mechanism) in advance of the construction activities, including mechanisms that exist via local health organisations and the police. Record and report cases specifically in relation to GBVH grievances, both in the community and in the workplace, as part of the wider monthly reporting requirements as set out in the SEP. 	Prevention of GBVH risks and concerns.	PR2/PS2. Good International Practices.	Construction Contractor.	Minimum requirements on GBVH adopted prior to site mobilisation. Ongoing implementation during construction.	<p>GBVH focal point assigned in the PIU.</p> <p>Code of Conduct signed.</p> <p>Project Gender Equality and GBVH Action Plan adopted.</p> <p>Evidence that inductions for workforce and training for HR personnel delivered and logged in relation to GBVH, on induction and annually thereafter, with a review of the need for additional training following reports of an incident.</p> <p>Evidence of adoption and implementation of a confidential grievance mechanism on GBVH.</p> <p>Mentoring programme for women in place.</p> <p>Report on gender-disaggregated workforce numbers in construction monitoring reports in line with requirements set out in the Project Labour Management Plan.</p> <p>Report on GBVH cases monthly.</p> <p>Evidence of community awareness activities with the local community prior to construction on site.</p>	
2.8	<p>Security Personnel Requirements</p> <p>The Construction Contractor will conduct due diligence investigation for all security</p>	Prevent conflict between security	EBRD PR2.	Construction Contractor.	Prior to employing security personnel.	Due diligence carried out and documented/reported to PIU.	

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	<p>personnel to make sure they have appropriate licensing, experience and training.</p> <p>Security personnel will be trained in the use of force and in the applicable laws so that no contravention of national legislation takes place, including GBVH. Training will also cover the guiding principle that force shall not be used except in defence and in proportion with the nature and extent of the threat.</p> <p>If security personnel are armed, then train them on UN Voluntary Principles of Human Rights.</p>	<p>personnel and local communities.</p> <p>Prevent potential human rights violations by security personnel.</p>			Incident reporting during construction.	<p>Training evidence/records.</p> <p>Report to EBRD any incidents involving security guards.</p>	
2.9	<p>Labour Grievance Mechanism</p> <p>The PIU will set up and maintain a Project-specific Labour Grievance Mechanism for PIU staff. All staff will be informed of the mechanism on employment; and details of expected timelines to address complaints will be provided. Anonymity will be maintained where requested.</p>	To provide a channel for raising workers' concerns and a transparent, consistent mechanism for resolution.	EBRD PR2, PR10. Good international practice.	PIU.	<p>Developed and approved prior to activities commencing.</p> <p>Implement during construction.</p>	Adoption of formal labour grievance mechanism for employees in PIU.	
2.10	<p>Construction Labour Grievance Mechanism</p> <p>The Construction Contractor will set up and maintain a formal labour grievance mechanism for employees and disseminate information about its uses to the workforce in the language(s) of the workers, including possibility of anonymous grievances submission.</p>	To provide a channel for raising workers' concerns and a transparent, consistent mechanism for resolution.	EBRD PR2, PR10. Good international practice.	Construction Contractor.	<p>Developed and approved prior to activities commencing.</p> <p>Implement during construction.</p>	<p>Adoption of formal labour grievance mechanism for contractor employees in line with Project ESMS.</p> <p>Grievances and resolutions proposed to be reported to MoE/PIU in monthly reports, or to frequency as agreed.</p> <p>Submission of AESR to MoE/PIU.</p>	
2.11	<p>Human Resource (HR) Policies and Working Relationships</p> <p>The NPTG will develop/adopt Project policies, covering as minimum:</p> <ul style="list-style-type: none"> Environmental and Social policy 	To ensure management of workforce in line with EBRD requirements and Mongolian Labour Code.	EBRD PR2. Mongolian Labour Law. Good international practice.	NPTG.	<p>HR policy and Labour Management Plan developed and adopted prior to operation.</p> <p>HR Policies and Labour</p>	<p>Project policies and Labour Management Plan prepared and implemented.</p> <p>Implementation of the Plan should be reviewed quarterly and annually by</p>	

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	<ul style="list-style-type: none"> Human resources policy (covering labour and working conditions and community health and safety and gender). Ensure employees and suppliers have access to human resources policies and are aware of their rights to a trade union. Discrimination and Harassment Policy Supply Chain Policy and Management Plan. <p>If not already in existence, a Labour Management Plan for the O&M phase should be developed. This should cover child and forced labour. Mental Health and Wellbeing Support should be integrated into the operational HR policy, including signposting to counselling resources and training on stress management and burnout prevention.</p>				Management\Plan implemented throughout operation.	NPTG's Monitoring Department.	
2.12	<p>Labour and Working Conditions</p> <p>The NPTG should implement the following measures:</p> <ul style="list-style-type: none"> Adopt a gender-sensitive workplace policies to comply with the revised Labour Code. Develop and implement a stand-alone Gender Equality and GBVH Action Plan, which will include training to project employees, suppliers and contractors on GBVH associated risks. Include requirements related to gender considerations in bidding documents. In particular, the objective of increasing the number of women working in the construction sector should be set for all contractors to reflect this in their policies and operations. Promote open discussions about GBVH concerns through disclosure of gender awareness materials/training 	Provision of equal opportunities and improving economic prospects of local residents.	EBRD PR2. Good international practice.	NPTG.	During operation.	<p>GBVH/Gender risk assessment.</p> <p>Project Gender Equality and GBVH Action available.</p> <p>GBVH training provided to staff on induction and annually thereafter, with a review of the need for additional training following reports of an incident.</p> <p>Gender disaggregated data will be maintained on staff and contractors.</p> <p>Evidence will be maintained that women and men are paid the same wages for work of the same value, i.e. remuneration is based on the employee's skills, experience, responsibilities</p>	

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	<ul style="list-style-type: none"> Provide training to staff and suppliers on GBVH. 					and other objective, non-gender-related factors.	
2.13	Human Resource (HR) Policies and Working Relationships. The NPTG will conduct an Annual Labour Audit to assess operational workforce conditions, including pay, working hours, contract compliance, PPE provision, and grievance uptake.	To ensure management of workforce in line with EBRD requirements and Mongolian Labour Code.	EBRD PR2. Mongolian Labour Law.	NPTG.	During operation.	Annual labour audit report.	
2.14	Project Labour Grievance Mechanism. The NPTG will maintain a formal labour grievance mechanism for employees and contractors and disseminate information about its uses to the workforce in the language(s) of the workers/ contractors, including possibility of anonymous grievances submission.	To provide a channel for raising workers' concerns and a transparent, consistent mechanism for resolution.	EBRD PR2, PR10. Good international practice.	NPTG.	During operation.	Presence of a formal Project labour grievance mechanism. Evidence of dissemination of the labour grievance mechanism to employees and contractors. Submission of AESR to EBRD.	
PR3	Resource Efficiency and Pollution Prevention Control						
3.1	Resource Efficiency Report on resources to be used and efficiency measures to be put in place for energy use, water, extracted materials use, etc.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Prior to construction activities commencing.	Requirement for contractor to prepare details on resource efficiency and include within CESMP.	
3.2	Air Emission Controls and Monitoring Prepare and implement an Air Quality Management Plan as part of the detailed CESMP with measures to control fugitive emissions and point source emissions and dust as identified in the ESIA/ESMP. No concrete mixing plan or borrow pits are required for this Project. Should this position change, ensure and E&S screening is undertaken and that concrete mixing plant and, borrow pits, should be located at least	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Develop prior to construction activities commencing. Implement prior to and during construction.	Detailed Air Quality Management Plan approved by PIU. Plan provided to EBRD for review and no-objection approval. Periodic dust monitoring, as required. Progress report from contractor during construction through	

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	<p>500 m to 1 km downwind from receptors (which include herder wells).</p> <p>Develop detailed dust monitoring plan and conduct baseline dust monitoring in accordance with requirements set out in the ESIA/ ESMP.</p> <p>Conduct visual dust monitoring daily during construction.</p>					monthly, quarterly and annual reporting to PIU.	
3.3	<p>Pollution Prevention and Control – Waste waters</p> <p>Prepare and implement a Water, Wastewater and Drainage Management Plan as part of the detailed CESMP with enhanced measures on wastewater management in line with the ESIA/ESMP. Specify measures to be used on site and at camps.</p>	Management of environmental impacts on receptors.	<p>EBRD PR3.</p> <p>Good international practice.</p>	Construction Contractor.	<p>Develop prior to construction activities commencing.</p> <p>Implement during construction.</p>	<p>Detailed Water, Wastewater and Drainage Management Plan approved by PIU.</p> <p>Plan provided to EBRD for review and no-objection approval.</p> <p>Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.</p>	
3.4	<p>Water</p> <p>Undertake a water needs and impacts assessment for water demand during construction. Use this information to prepare and implement detailed Construction Water, Wastewater and Drainage Management Plan as part of the CESMP, with enhanced measures to protect local water sources in line with the ESIA/ESMP.</p> <p>Identify location of herder groundwater supplies in relation to final route prior to construction on site and protect them from damage in construction. Survey of well presence in all areas affected by construction including camps, lay down areas and access roads used.</p> <p>Ensure the Code of Conduct prohibits construction workers from using herder wells</p>	Management of environmental impacts on receptors.	<p>EBRD PR3.</p> <p>Compliance with regulatory requirements of Mongolia.</p> <p>Good international practice.</p>	Construction Contractor.	<p>Develop prior to construction activities commencing.</p> <p>Implement prior to and during construction.</p>	<p>Detailed Water, Wastewater and Drainage Management Plan approved by PIU.</p> <p>Plan provided to EBRD for review and no-objection approval.</p> <p>Herder wells demarcated within 500 m of construction works.</p> <p>Water protection zones demarcated.</p> <p>Permits for water abstraction in place.</p> <p>Well drilling (water supply) method statement for approval by PIU.</p> <p>Groundwater use monitoring report.</p>	

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	<p>and that workers are inducted fully on the Code of Conduct.</p> <p>Develop 'water protection zones' around surface water features identified in the ESIA/ESMP. No refuelling to be permitted within 50m of zone of these sites.</p> <p>Any water permits required to be obtained prior to abstraction. Provide well drilling (water supply) method statement for any wells proposed.</p> <p>Monitor water use/extraction from any groundwater wells used specifically for construction.</p>					Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.	
3.5	<p>Waste controls</p> <p>Develop detailed Materials Use and Waste Management Plan (to include hazardous wastes) as part of the CESMP, which includes the following:</p> <ul style="list-style-type: none"> • Application of waste hierarchy in project planning to ensure efficient use and management of resources so that priority is to prevent from generation of waste at source as much as possible. • Minimum rate of recovery of at least 60%. • Pre-determine types and amount of waste (especially hazardous waste) to be generated as much as possible in order to enable planning of management actions effectively prior to construction. • Procedures for proper handling of all waste generated and waste segregation/designated storage locations. • Secondary containment measures for hazardous materials and stored in construction compounds. Use fluid 	<p>Management of environmental impacts on receptors.</p> <p>Compliance with regulatory requirements of Mongolia.</p>	<p>EBRD PR3.</p> <p>Compliance with regulatory requirements of Mongolia.</p> <p>Good international practice.</p>	<p>Construction Contractor.</p> <p>PIU to pre-approve waste disposal routes.</p>	<p>Develop prior to construction activities commencing.</p> <p>Implement during construction.</p>	<p>Detailed Materials Use and Waste Management Plan approved by PIU.</p> <p>Plan provided to EBRD for review and no-objection approval.</p> <p>Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.</p>	

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	catchment trays in vehicle refuelling areas. <ul style="list-style-type: none"> Identify licensed facilities for acceptance and disposal of construction waste and other waste streams including hazardous waste. Obtain related permits and have agreements with relevant local authorities for waste management, including transportation and disposal of solid and liquid waste. Methods to verify proper off-site management of related wastes by contractors. 						
3.6	Noise and Vibration Controls and Monitoring Prepare and implement a Noise and Vibration Management Plan as part of the detailed CESMP, with enhanced measures to control noise and vibration in accordance with the ESIA/ESMP, should there be any herder camps be located within 90m of the final design. Additionally, where herder camps are located within 90m of the final design, conduct a pre-construction noise survey at closest noise-sensitive herder households/winter camps to the RoW/ works areas.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Prior to construction activities commencing. Implement prior to and during construction.	Detailed Noise and Vibration Management Plan approved by PIU. Plan provided to EBRD for review and no-objection approval. Pre-construction baseline established, where relevant. Monitoring during construction. Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.	
3.7	Soil Erosion and Pollution Controls Prepare and implement a Pollution Prevention Plan, Spill Prevention and Response Plan and Soil Management and Site Reinstatement Plan as part of the detailed CESMP in accordance with the ESIA/ESMP. This should include planning of any earthworks, access roads and temporary works areas/ camps in a way to disturb minimal amount of area and therefore	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Construction Contractor.	Prior to construction activities commencing. Implement during construction.	Detailed management plans approved by PIU. Plans provided to EBRD for review and no-objection approval. Progress report from contractor during construction through	

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	minimum topsoil stripping (i.e.: maximising use of existing dirt roads and areas previously disturbed by the construction of the railway lines in the Project Area). It should also include the removal and storage of soil in layers to avoid excessive mixing of topsoil with lower layers that have a lower nutrient levels, and reuse of the soils in the appropriate layers, to support revegetation.					monthly, quarterly and annual reporting to PIU.	
PR4	Health, Safety and Security						
4.1	<p>Construction Phase Occupational Health and Safety (OHS).</p> <p>Develop and implement a detailed OHS Plan as part of the CESMP, to guide all OHS-related activities on the project site during site preparation and construction. Requirements to include (but not to be limited to):</p> <ul style="list-style-type: none"> • Job and task specific hazard analysis and controls for all activities. • Requirements for and enforcement of Personal Protective Equipment (PPE) use. • Safety training for personnel. • Develop and implement an emergency response procedure. • Oversight of contractor OHS development / implementation, including mandatory reporting to MoE/PIU. • Maintain statistics of total work hours, lost time, incidents, injuries, near misses etc. • Toolbox talks to share information on risks, accident prevention, etc. • Ensure no prohibited materials, such as asbestos containing materials, are procured or used. 	<p>To ensure management of workforce in line with EBRD requirements.</p> <p>To prevent OHS incidences.</p>	<p>EBRD PR2.</p> <p>EBRD PR4.</p> <p>Good international practice.</p> <p>EU OSH Framework.</p>	Construction Contractor.	Develop prior to construction activities. Implement during construction.	<p>Detailed OHS Plan for approval by MoE/PIU.</p> <p>Plans provided to EBRD for review and no-objection approval.</p> <p>Risk assessment prepared and Construction Risk Register maintained.</p> <p>Progress report from contractor during construction through monthly, quarterly and annual reporting to MoE/PIU.</p> <p>Labour Grievance Mechanism.</p> <p>Track and report monthly on KPIs, such as:</p> <ul style="list-style-type: none"> • Lost Time Injuries (LTIs) • Near misses • PPE compliance rates • Safety training completion rates 	

No.	Action	Environmental & Social Risks (Liability/ benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsible Party	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	<p>The OHS Plan will include KPIs proposed to be monitored during construction.</p> <p>Before work begins, the Construction Contractor will conduct a thorough risk assessment. This will include consideration of any works close to, or crossing, other structures, including the existing OHTLs, railway lines, roads, and aspects such as remote working and natural hazards. The Construction Contractor will be compliant with relevant measures as set out in EBRD's Briefing Note 01: Underground and overhead services, Electric power and distribution health and safety toolkit <i>and</i> Working near Overhead Cables.</p> <p>A Construction Risk Register for the Project will be developed and maintained by the Construction Contractor.</p>						
4.2	<p>Operation Phase Occupational Health and Safety</p> <p>The NPTG will develop an OHS Plan for the O&M phase or integrate Project requirements into existing OHS Plans. This should include necessary provisions to ensure that the risk of exposure of the workers, especially at the substations, is assessed and monitored. This should include:</p> <ul style="list-style-type: none"> Conducting a Project specific risk assessment identifying 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 services³, Electric power and distribution health 	<p>To ensure management of workforce in line with EBRD requirements.</p> <p>To prevent OHS incidences.</p>	<p>EBRD PR2.</p> <p>EBRD PR4.</p> <p>Good international practice.</p> <p>EU OSH Framework.</p>	NPTG.	Developed prior to and maintained during operation.	<p>Detailed O&M OHS Plan for review.</p> <p>Plans provided to EBRD for review and no-objection approval.</p> <p>Project specific risk assessment.</p> <p>Records of monitoring risk of exposure of staff.</p> <p>Labour Grievance Mechanism.</p>	

³ Available at: [How to implement our performance requirements](#)

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	<p>and safety toolkit⁴ and Working near Overhead Cables⁵.</p> <ul style="list-style-type: none"> Functional testing, commissioning, performance, testing and reliability testing of the complete Project. That appropriate safety signage is on display within the substations and on all towers, following GIP electrical specifications and codes of practice. Staff are adequately trained. Specialised and electrical PPE will be provided for the workforce in accordance with relevant standards, including those specifically relevant to working with or around electricity. Regular maintenance of equipment. Adequate earthing of equipment to prevent shocks and malfunctioning of protection equipment. Provision of a fire detection and protection system to international standards. Avoid carrying out maintenance works during periods of high wind speed, particularly tasks that require staff to work at height. Regular inspection of the RoW to ensure non permitted land uses are not occurring. Ensure that any flammable materials are stored away from areas frequently used by workers to reduce risk of fire spread. Remove any flammable vegetation or materials from these 						

⁴ Available at: [How to implement our performance requirements](#)

⁵ Available at: [Working_near_overhead_cables_En.pdf](#)

No.	Action	Environmental & Social Risks (Liability/ benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsible Party	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	areas and provide fire suppression equipment to staff.						
4.3	Operation Phase Occupational Health and Safety Take reasonable steps to prevent harm in the workplace from exposure to EMFs, in line with the EU Directive 2013 on the minimum health and safety requirements regarding the exposure of workers to the risks arising from physical agents (electromagnetic fields). Compliance with health effects ELVs and sensory effects ELVs must be established by the use of relevant exposure assessment procedures, as set out in Article 4 of the Directive. Assess the risks for workers 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 (i.e. there is a risk that exceeds acceptable limits as set out in the EU Directive), an action plan will be developed and additional information and training provided to the employee. Appropriate health surveillance and medical examinations may also be required for staff who exceed the Health Effects Exposure Limit Values and report experiencing a health effect.	To ensure management of workforce in line with EBRD requirements. To prevent OHS incidences.	EBRD PR2. EBRD PR4. Good international practice. EBRD PR2 EBRD PR4. ICNIRP 2020. EU Directive 2013 on the minimum health and safety requirements regarding the exposure of workers to the risks arising from physical agents (electromagnetic fields)	NPTG.	Developed prior to and maintained during operation.	Assess risk of EMF exposure to workers. Where required, develop an action plan. Plan provided to EBRD for review and no-objection approval. Appropriate health surveillance and medical examinations for staff who exceed the Health Effects Exposure Limit Values and report experiencing a health effect. Labour Grievance Mechanism.	
4.4	Construction Phase Community Health and Safety The Construction Contractor will develop and implement a Community Health, Safety and Security Plan. This will incorporate key measures that affect Project community members from the Air Quality, Noise, Traffic, and Water, Wastewater and Drainage Management Plans and address health and safety measures specifically relevant to community members, including reference to their access limitations to restricted working	To minimise accidents and incidents with road users, local communities and livestock.	EBRD PR4. Good international practice.	Construction Contractor.	Community Health, Safety and Security Plan developed and approved prior to construction activities commencing. Implement during construction.	Community Health, Safety and Security Plan approved by MoE/PIU and Construction Supervision Engineer. Progress report from Contractor during construction through monthly, quarterly and annual reporting to Construction Supervision Engineer.	

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	<p>areas, and construction schedules highlighting noisy or dusty works.</p> <p>Additional measures will include:</p> <ul style="list-style-type: none"> Public notice to be given of construction operations and programme. Public education/awareness raising sessions held in high-risk areas (i.e., construction near herder wells and camps, over roads and railway lines etc.) and people (e.g., encourage herders not to leave livestock unattended) to make potentially affected people aware of the risks and controls in place. Notice to nearby herder households and local authorities, road and rail operators, before major activities and construction traffic. Access routes to be agreed with local authorities and local herder households. Toolbox talks with workers to ensure workers are aware of measures to avoid risk to local communities; Implementation of safe working practices during construction including provision of hazard notices/signs/barriers. Employ adequate measures to prevent unauthorized access to construction working areas. Appropriate signage and measures to prevent accidents at any sites of deep excavations e.g. young children or livestock falling in, to be taken. 					<p>Meetings held will all 11 baghs and herder households prior to the start of construction. At least one meeting per year to be held at the soum level and, where requested, bagh level, to keep the local community informed of work activities. Records of meetings.</p> <p>Community Grievance Mechanism.</p>	
4.5	<p>Construction Phase Community Health and Safety</p> <p>To support and reinforce the Community Health, Safety and Security Management Plan, the Construction Contractor will</p>	To ensure management of workforce in line with EBRD requirements.	EBRD PR4. Good international practice.	Construction Contractor.	Influx Management Plan developed and approved prior to construction activities commencing.	Influx Management Plan approved by MoE/PIU and Construction Supervision Engineer.	

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	develop and implement an Influx Management Plan will be developed. This will address the risks and potential impacts associated with influx to and from the Project, especially the 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.	To minimise impacts on local communities and herder households. To avoid incidents of GBVH.			Implement during construction.	Progress report from Contractor during construction through monthly, quarterly and annual reporting to Construction Supervision Engineer.	
4.6	<p>Construction Phase Community GBVH</p> <p>The Construction Contractor will ensure that all workers are issued, and will sign, a Code of Conduct and inducted for cultural sensitisation and site safety procedures.</p> <p>In relation to GBVH and SEAH, the Construction Contractor will meet the ILO's Convention No. 190 on eliminating violence and harassment in the workplace and the EBRD, IFC and CDC Groups sector-level briefs on GBVH – 'Addressing Gender-Based Violence and Harassment (GBVH) in the Construction Sector'⁶ and 'Addressing Gender-Based Violence and Harassment (GBVH) in the Public Transport Sector'⁷. Regular training and communications to workers on understanding GBVH risks in affected communities.</p> <p>Communicate to local communities and herder households the expectations of project workers to abide by the Code of Conduct, including zero tolerance for sexual harassment, exploitation and abuse, and reporting channels available.</p>	To avoid incidents of GBVH.	EBRD PR2. EBRD PR4. Good international practice.	Construction Contractor.	Develop prior to construction activities commencing. Implement during construction.	<p>Code of Conduct in place and implemented.</p> <p>Record of all staff having signed the Code of Conduct.</p> <p>Training records.</p> <p>As with 4.4 above, meetings held will all 11 baghs and herder households prior to the start of construction. At least one meeting per year to be held at the soum level and, where requested, bagh level, top keep the local community informed of work activities. Records of meetings.</p> <p>Community Grievance Mechanism.</p>	

⁶ Available at: <https://assets.cdcgroup.com/wp-content/uploads/2020/07/14193353/Addressing-GBVH-in-the-construction-sector.pdf>

⁷ Available at: <https://assets.cdcgroup.com/wp-content/uploads/2020/07/14193354/Addressing-GBVH-in-the-public-transport-sector.pdf>

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4.7	<p>Operation Phase Community Health and Safety</p> <p>All publicly accessible areas will remain within the ICNIRP reference levels for both electric and magnetic fields at all times during operation. The design and siting of towers will ensure that no permanent or temporary dwellings, including herder camps, are located within the 25m Right-of-Way (RoW) from the outer edge of the transmission towers.</p> <p>Implement a targeted public awareness programme, including:</p> <ul style="list-style-type: none"> • Clear, plain-language information materials explaining Electromagnetic Field (EMF) exposure compared with everyday sources such as household appliances and mobile phones. • Visual aids showing EMF levels at various distances from the lines relative to international safety limits. • School-based and community safety education sessions, emphasising the importance of staying clear of towers and restricted areas. <ul style="list-style-type: none"> - Permanent, multilingual warning signage at all access points in accordance with national and international best practice. <p>Access to the towers will be controlled through fencing, anti-climb devices, and regular inspection. These measures will be complemented by ongoing community engagement to reinforce safety messages and address emerging public concerns.</p>	To minimise accidents and incidents with road users, local communities and livestock.	EBRD PR4. Good international practice.	NPTG.	Prior to operation.	<p>No permanent or temporary dwellings, including herder camps, are located within the 25m RoW from the outer edge of the transmission towers.</p> <p>Records of public awareness completed.</p> <p>Evidence of fencing, anti-climb devices and signage on towers and around substations.</p> <p>Inspection records.</p>	
4.8	<p>Infrastructure, Building, and Equipment Design and Safety / Natural Hazards</p> <p>Ensure final design takes into account climate impacts, including:</p>	To ensure design addresses climate resilience and reduces risk to towers and substations, and	EBRD PR4, PR1. Good international practice.	MoE/Construction Contractor.	In final design.	Incorporation of appropriate measures into final design.	

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	<ul style="list-style-type: none"> Implement overhead line sag monitoring techniques regularly to assess and proactively manage sagging. Utilise granite dust in paved areas to reduce the risk of road melt during periods of extreme heat. Plant indigenous heat, fire, and drought resistant vegetation. Utilise hydrophobic coatings to reduce ice and snow accumulation and mitigate impacts of heavy rainfall. Consider increasing the tension of the OHTL to reduce wind-induced oscillation, and utilise wind-breaks or sand fences to reduce the impacts associated with windblown sand and debris. Consider installing sand fences to reduce sand accumulation around assets and reduce the risk of arcing. Consider installing current-limited fuses to allow for automatic interruption of power flow should overheating occur, mitigating the risk of arcing and minimising fire risk. Consider implementing lightning arresters to divert potential lightning strikes during storm events. 	consequently workers or local community members/herder households.					
4.9	<p>Natural Hazards.</p> <p>The Construction Contractor will provide information on drainage channels, in particular measures to prevent potential disruption to drainage channels and destabilisation of nearby towers during periods of heavy rain.</p> <p>The Construction Contractor will also ensure that natural hazards are assessed as part of the construction risk assessment (see 4.1).</p>	To ensure design addresses climate resilience and reduces risk to towers and local communities/herder camps.	EBRD PR4, PR1.	Construction Contractor.	In final design.	<p>Incorporation of appropriate measures into final design.</p> <p>Risk assessment incorporating natural hazard risks.</p>	

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4.10	Traffic, Road and Rail Safety Develop Traffic Management Plan as part of the ESMP. It should include as a minimum: <ul style="list-style-type: none"> • Management of access roads and construction traffic. • Provision of safe access and egress across works for herders. • Publication of details on temporary livestock crossings, or other measures to enable livestock to continue crossing the project during construction. • Construction vehicles to keep to agreed access routes, minimise risk and disruption to project affected communities and other road users and adhere to speed limits. • Appropriate management of interaction of construction traffic with public road users, such as use of traffic marshals/flagmen on main roads, where necessary. • Measures to maintain the safety of road users / temporary diversions, when undertaking construction works that pass over existing paved and unpaved roads. • Any complex traffic control to be coordinated in liaison with the Road Police. • All construction works over railway lines to be co-ordinated with railway operator and rail closure to be sought and secured in advance of works. 	To minimise accidents and incidents with road users, local communities and livestock, and maintain local access.	EBRD PR4. Good international practice.	Construction Contractor.	Develop prior to construction activities commencing. Implement during construction.	Detailed management plan/procedures approved by PIU. Plans/procedures provided to EBRD for review and no-objection approval. Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.	
4.11	Exposure to Disease Develop and implement procedures to control exposure to disease in accordance	To minimise spread of diseases.	EBRD PR4. Good international practice.	Construction Contractor.	Develop prior to construction activities commencing.	Detailed management plan/procedures approved by PIU.	

No.	Action	Environmental & Social Risks (Liability/ benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsible Party	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	<p>with the ESIA/ ESMP/ Project ESMP; to include as a minimum:</p> <ul style="list-style-type: none"> Disease control measures. Construction workers' accommodation camps measures to meet IFC/EBRD requirement, especially hygiene standards. Medical surveillance of all workers to detect the risk of any Sexually Transmitted Diseases to workers and the general public. Toolbox talks with workers. 				Implement during construction.	<p>Plans/procedures provided to EBRD for review and no-objection approval.</p> <p>Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.</p>	
4.12	<p>Emergency Preparedness and Response</p> <p>The Construction Contractor will develop and implement an Emergency Preparedness and Response Plan as part of the CESMP, in accordance with the ESIA/ESMP. It should include as a minimum:</p> <ul style="list-style-type: none"> Identification of potential emergencies and risk assessments. Roles and responsibilities. Development of procedures to respond to identified emergencies. Equipment required e.g. first aid facilities, firefighting equipment, etc. Testing and inspection regimes for emergency equipment. Muster points. evacuation routes. Training requirements. Communication protocols to workers, public and other affected parties. Emergency medical and evacuation protocol. Location of nearest medical facilities. Update and review cycle. 	Prepare for emergencies to minimise negative impacts.	EBRD PR4. Good international practice.	Construction Contractor.	<p>Develop prior to construction activities commencing.</p> <p>Implement during construction.</p>	<p>Detailed management plan/procedures approved by PIU.</p> <p>Plans/procedures provided to the EBRD for review and no-objection approval.</p> <p>Provision of an on-site physician who can provide primary care and basic treatment services.</p> <p>Progress report from Contractor during construction through monthly, quarterly and annual reporting to PIU.</p> <p>Evidence of emergency preparedness drills, both internally and with the local community and authorities and emergency services.</p>	

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	<p>This plan should be developed and implemented in liaison with local community members, authorities and emergency services, and cover the requirements of this PR. This should be in place prior to construction commences on site.</p> <p>The Construction Contractor will carry out emergency response drills on a periodic basis (at least monthly). All staff must participate in these drills. Findings from the emergency response drills shall be documented and communicated in lessons learned bulletins or shared with the relevant parties such as the regulators. 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. Specific items for review will include:</p> <ul style="list-style-type: none"> • Correctness of telephone numbers • Correctness of external interfaces • Adequacy of first-aid facilities on site • Adequacy of treatment facilities at local health clinics • Response times • Specific additional training requirements • Employee understanding and participation 						
4.13	<p>Emergency Preparedness and Response</p> <p>A Project-specific O&M Emergency Preparedness and Response Plan should be developed and implemented by NPTG. A medical evacuation procedure should be</p>	Prepare for emergencies to minimise negative impacts.	EBRD PR4. Good international practice.	NPTG.	Develop prior to operation. Implement during O&M.	Plans/procedures provided to the EBRD for review and no-objection approval.	

No.	Action	Environmental & Social Risks (Liability/ benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsible Party	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	developed to enable injured workers to access appropriate emergency facilities. First aid facilities should also 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.						
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	Consultation and Grievance Mechanism Implement the Project SEP and a formal grievance mechanism made available to local residents for land acquisition, including affected landowners and land users. Consult with potentially affected parties, including utility owners, owners of allocated land for development, the local authorities for Local protection areas and targeted engagement with the herder households within 1km of the Project route. Grievance mechanism log to be maintained by PIU for land acquisition.	Avoid misunderstandings and provide up-to-date information on land acquisition activities.	EBRD PR5.	NPTG/MoE/PIU/Construction Contractor, as required.	Pre-construction	Document Project SEP implementation by keeping records of meetings and participants, information dissemination activities, etc. Project land acquisition grievance mechanism and log.	
5.2	Land Acquisition Documentation and Implementation The NPTG, with support from the MoE/PIU and any nominated specialists, will ensure all permanent land requirements are secured in accordance with national legislation and agreed with the relevant landowners/users in line with PR5. This will require agreement with relevant land owners and users: <ul style="list-style-type: none"> Individuals or organisations that possess access to the areas of land allocated for development and agree that the land can be used for the Project; Mining licence holders; 	Ensure compliance with EBRD requirements.	EBRD PR5	NPTG, input from MoE/PIU/Construction Contractor, as required.	Prior to construction works that will affect asset identified.	Change Management Procedure. E&S screening report. Final design pre-commencement survey to confirm need for a RAP/LRP. Confirmation letters signed with relevant parties. Possession certificate. RAP/LRP, if required.	

No.	Action	Environmental & Social Risks (Liability/ benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsible Party	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	<ul style="list-style-type: none"> Mineral Resources and Petroleum Authority; The company Blast, who own the site for explosives storage near Tsagaan Suvarga mine; Utility and infrastructure owners that could be affected by the construction of operation of the project, such as the railway line operators; Aimag and soum leaders, for any changes to the existing route; and Local herders within 1km of any final route. <p>Where agreement is not possible, a new alignment may be required. As such, the PIU will establish a Change Management Procedure that triggers the requirement for additional or new E&S assessment for changes to project components, such as route and location changes, especially if the route changes to the route identified and assessed in this ESIA. The E&S screening tool provided in the ESMP can be used as a base to establish whether further assessment is required.</p> <p>Ensure a survey is undertaken prior to works of the final confirmed route, including any micro-siting of towers. This may require input from the Construction Contractor, if no further detailed design is proposed.</p> <p>Once a final route is ready, the NPTG will need to apply for a Possession Certificate in accordance with the Law on Land.</p> <p>Where appropriate and required, development and implementation of a RAP and/or LRP in accordance with the LARF – see 5.3 below.</p>						

No.	Action	Environmental & Social Risks (Liability/ benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsible Party	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
5.3	<p>Resettlement Action Plan (RAP) / Livelihood Restoration Plan (LRP) Documentation and Implementation</p> <p>Should the pre-commencement survey identified in 4.1 above indicate potential physical or economic displacement, in the first instance, the tower locations will be moved to avoid the displacement in the first instance.</p> <p>Should this not be feasible, a detailed survey of all displacement (economic and physical) will be undertaken, covering census, assets and socio-economic survey, and develop a RAP/LRP as appropriate, in accordance with the LARF (and with the eligibility matrix in the LARF). Development of RAP/LRP report to record the above.</p> <p>Provide all information and evidence of agreements with affected parties.</p> <p>Provide information on socio-economic surveys.</p> <p>Provide map / list of properties within Project footprint.</p> <p>All compensation disbursed prior to start of clearance of affected asset.</p> <p>Provide a Completion Report to verify that all land acquisition and resettlement have been carried out in line with LARF and PR5.</p>	Ensure compliance with EBRD requirements.	EBRD PR5.	MoE/PIU, or nominated specialists as relevant.	Prior to construction works that will affect asset identified.	<p>Where required, i.e. for any involuntary displacement, prepare a RAP/LRP.</p> <p>Records of all land acquisition activities, compensation framework and disbursements within a RAP/LRP.</p> <p>Land acquisition plans and agreements with affected parties</p> <p>Disbursement of compensation.</p> <p>Number of grievances.</p>	
5.4	<p>Land Acquisition Documentation and Implementation</p> <p>The Construction Contractor will develop an Infrastructure Strategy together with the MoE/PIU/NPTG, covering engagement with infrastructure and utility owners and activities to prevent damage to infrastructure. This may cover the following activities:</p> <ul style="list-style-type: none"> Coordination with the relevant authorities and asset owners to identify 	Ensure compliance with EBRD requirements.	EBRD PR5.	Construction Contractor, input from MoE/PIU/NPTG.	Prior to construction works that will affect asset identified.	<p>Infrastructure Strategy.</p> <p>Confirmation letters signed with relevant parties.</p> <p>Should any damage occur, evidence of restoration and/or compensation activities will be undertaken by the Construction Contractor.</p>	

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	<p>OHTL route crossings with other infrastructure, including obtaining technical requirements or conditions for the OHTL intersections / crossings and construction management requirements. All consultations will include formal communications; and</p> <ul style="list-style-type: none"> Avoiding damage to existing infrastructure and utilities during the construction of the substation and the OHTL from inappropriate construction activities (e.g. driving of machinery). Should any damage occur, restoration and/or compensation activities will be undertaken by the Construction Contractor. 						
5.5	<p>Land Acquisition Documentation and Implementation</p> <p>Wherever feasible, the Construction Contractor will identify sites for temporary land requirements (e.g. construction camps, workers' camps, access roads, etc.) in voluntary agreement with the land owner/user, without any form of coercion. Where this is not possible and physical and/or economic displacement may be necessary, the Construction Contractor will ensure these temporary land requirements are secured in accordance with the LARF. Where required, development and implementation of a RAP and/or LRP in accordance with the LARF. This should be undertaken in liaison with PIU. All compensation disbursed prior to start of works on site with affected asset.</p>	Ensure compliance with EBRD requirements.	EBRD PR5.	Construction Contractor.	Prior to construction works that will affect asset identified.	<p>RAP/LRP, if required.</p> <p>Disbursement of compensation, if required.</p> <p>Number of grievances.</p>	
5.6	<p>Land Acquisition Documentation and Implementation</p> <p>Access will be maintained to all herder households during construction.</p>	Ensure compliance with EBRD requirements.	EBRD PR5.	Construction Contractor.	During construction.	<p>Grievances recorded in relation to access and temporary land use.</p> <p>Evidence of appropriate mitigation including, where</p>	

No.	Action	Environmental & Social Risks (Liability/ benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsible Party	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	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 LARF. Following the temporary use of land, the Construction Contractor will reinstate the land in accordance with the Soil Storage and Site Reinstatement Plan.					relevant, compensation in line with the LARF. Reinstatement report.	
5.7	Monitoring Where relevant (i.e. a RAP or LRP was necessary), monitoring of the land acquisition and compensation activities to ensure compliance with EBRD PR5/LARF. Any gaps will be identified and notified to the PIU to address.	Ensure compliance with EBRD requirements.	EBRD PR5.	MoE/PIU.	After completion of land acquisition.	EBRD audit/ monitoring report.	
5.8	Monitoring Where relevant (i.e. a RAP or LRP was necessary), undertake formal completion audit with the external resettlement expert.	Ensure compliance with EBRD requirements.	EBRD PR5.	EBRD.	After completion of land acquisition.	Independent resettlement completion audit.	
5.9	Monitoring 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.	Ensure compliance with EBRD requirements.	EBRD PR5.	Construction Contractor.	During construction	Monitoring reports as part of monthly reporting to the PIU. Where required, record of implemented mitigation measures.	
PR6	Biodiversity and Living Natural Resources						
6.1	Conservation of Biodiversity Ensure written permission from the relevant local authorities for the three locally protected sites that are within the transmission line route, before construction starts, including for any camps or access roads in this area. Any additional camps or access roads will not be permitted unless	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	Construction Contractor for temporary requirements.	Prior to construction works.	Relevant permissions/permits.	

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	express permission from the relevant local authorities has been gained.						
6.2	Conservation of Biodiversity Siting of construction compounds will consider the risk of bird nesting (including ground nesting birds) (risk to be determined by a suitably qualified person). If there is a risk of impacting nesting birds, a pre-site clearance check for nesting should be conducted.	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	Construction Contractor.	Prior to clearance works.	Records of survey and, if required, a pre site clearance report.	
6.3	Conservation of Biodiversity All project staff onboarding shall detail a zero-tolerance approach to poaching with strict application of non-poaching rules. These rules will be included in the Code of Conduct, which all workers will sign. Construction workforce should be brief on the risks of wildfires and enforcement measures should be put in place.	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	Construction Contractor.	Prior to and during construction works.	Training records. Records of signed Code of Conduct.	
6.4	Conservation of Biodiversity All construction works will be undertaken in compliance with the mitigation measures set out in the ESIA (Chapter 9), ESMP and the Biodiversity Management Plan. This includes: <ul style="list-style-type: none"> Elm trees which support nesting Cinereous Vulture should be retained (see Biodiversity Management Plan for location). Construction will be scheduled to avoid breeding and migration periods (March to August inclusive), especially around important features like the ephemeral pond, the marshy areas and known nest sites. Any nests of high-value raptor species noted should have a 500m buffer applied, with appropriate demarcation 	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	Construction Contractor.	During construction works.	Records of survey and, if required, a pre site clearance report and method statement.	

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	and signage; a check will be required prior to construction works. If it is essential to carry out work within this 500m buffer during construction works, then a suitably qualified and experienced ecologist should be contacted to monitor the nest and ensure no significant levels of distress or disturbance occurs to the bird. Limits of works may also be applied by the ecologist within this 500m buffer.						
6.3	Conservation of Biodiversity Provision of best-design bird flight diverters on conductors and earth wires following manufactures recommendations for spacing, at the three locations along the route alignment identified in the ESIA, where there is higher bird activity at the following locations: Area 1 – Pylon No. 18 to 32 Area 3 – Pylon No. 462 to 472 Area 4 – Pylon No. 513 to 526 Area 5 – Pylon No. 643 to 667 See Figure 1.	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	NPTG/PIU, as relevant Construction Contractor.	Prior to operation.	Inclusion of measures identified in the ESIA Report in final design.	
6.4	Conservation of Biodiversity A revision to a section of the route alignment at Area 2, between pylon numbers 139 and 210 has been proposed to avoid damage to habitat of good condition and locating the route within 100m of the ephemeral pond, which has potential to support high numbers of birds (when wet) and therefore increase collision risk. See Figure 2.	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	MoE/PIU/NPTG, as relevant Construction Contractor.	Prior to construction activities commencing.	Inclusion of revision to the route alignment identified in the ESIA Report in final design. Relevant agreements in place and Land Possession title obtained. Agreement from railway operator on slight variation to the angle of the overhead line crossing, if required.	
	Conservation of Biodiversity	Biodiversity protection.	EBRD PR1, PR6.	NPTG or their contractors.	During O&M activities.	Records of toolbox talks/training.	

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	<p>The NPTG will employ the following measures:</p> <ul style="list-style-type: none"> OHTL maintenance workers should be briefed and educated on the importance of not removing or disturbing active bird nests on towers, as well as the appropriate steps to take if they are found. Ideally any maintenance works should be timed to avoid the breeding season (March to August inclusive). If this is not possible, any active nests observed during preliminary pre-works checks, should be left in place and undisturbed 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. 	Compliance with EBRD requirements and local requirements.	Local requirements. International Best Practice.			Completed O&M checklists. Review by an experienced ecologist, where necessary.	
6.5	<p>Conservation of Biodiversity</p> <p>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.</p> <p>Vantage point 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.</p> <p>Bird corpse searches will also be undertaken along the OHTL during spring, autumn and</p>	<p>Biodiversity protection.</p> <p>Compliance with EBRD requirements and local requirements.</p>	<p>EBRD PR1, PR6.</p> <p>Biodiversity Management Plan.</p>	NPTG.	Post- construction for the first 2 years	<p>Reduction in bird electrocution.</p> <p>Monitoring reports.</p> <p>Updated Biodiversity Management Plan, as applicable to the need for adaptations based on monitoring results.</p>	

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	<p>winter seasons, looking out for and recording any bird carcass that is found to have been electrocuted. This programme may be run in collaboration with protected area managers and Non-Governmental Organisations (NGOs) (i.e. Eurasian Bustard Alliance).</p> <p>Indicators:</p> <ul style="list-style-type: none"> Changes in frequency of habitat usage by priority bird species Changes in number of breeding / nesting and migratory bird species (benchmarked against existing monitoring data) Changes in flight behaviour around OHTL Changes in frequency of bird corpses found during monitoring years. 						
PR7	Indigenous People						
-	Not applicable						
PR8	Cultural Heritage						
8.1	<p>Assessment and Management of Impacts on Cultural Heritage</p> <p>Commission a specialist Mongolian organisation to undertake archaeological and paleontological surveys (and potentially also an ethnographical study, where they consider necessary) in line with Mongolian law relating to land use and cultural heritage.</p> <p>Should any archaeological/ paleontological assets be identified within the Project route during the course of further survey, the preferred method of mitigation would be avoidance. 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</p>	<p>Preserve sites of cultural significance.</p> <p>Respecting traditions and customs.</p>	EBRD PR1, PR8. International Best Practice.	MoE/PIU.	Prior to construction.	<p>Cultural Heritage Management Plan and Chance Finds Procedure prepared and issued as part of the CESMP.</p> <p>Plans provided to EBRD for review and no-objection approval.</p>	

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	would be required to remove the assets. The detail of these measures should be included in a specific Cultural Heritage Management Plan to be developed by the MoE/their specialised consultants. The specialised consultants should also prepare a Chance Finds Procedure. The chance finds procedure must comply fully with EBRD Performance Requirement 8: Cultural Heritage.						
8.2	Assessment and Management of Impacts on Cultural Heritage Implement the Cultural Heritage Management Plan and Chance Finds Procedure. The Construction Contractor will provide training to construction staff on the implementation of the Cultural Heritage Management Plan and Chance Finds Procedure. During excavations, monitoring will take place of ground disturbance. Any chance finds discovered will be managed in accordance with the Chance Finds Procedure. The local communities will be informed of any chance finds via local bagh meetings between the contractor and bagh leaders.	Preserve sites of cultural significance. Respecting traditions and customs.	EBRD PR1, PR8. International Best Practice.	Construction Contractor.	During construction.	Training records on chance finds procedure and its implementation. Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.	
PR9	Financial Intermediaries						
-	Not applicable						
PR10	Information Disclosure and Stakeholder Engagement						
10.1	A Public Consultation Summary Report (PCR) will be prepared and disclosed following the ESIA Disclosure period. The document will be available on the EBRD and MoE website, and available in paper form at local soum offices. The local community will	Compliance with EBRD requirements.	EBRD PR1, PR10.	EBRD/ESIA Consultants.	Prior to construction.	PCR disclosed to the general public.	

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	be made aware of the disclosure via local soum and bagh officials.						
10.2	<p>Construction SEP</p> <p>The Construction Contractor will develop, implement and keep up-to-date a detailed Construction SEP (CSEP) for approval by PIU. The CSEP will be disclosed by:</p> <ul style="list-style-type: none"> Engagement with local soum and bagh leaders Informing the local communities of the CSEP during pre-construction meetings Informing individuals via methods as set out in the Project SEP, such as Facebook and focus group discussions. <p>A community liaison officer (CLO) will be appointed by the Construction Contractor to coordinate engagement with project stakeholders and address any requests and grievance they might have in relation to the project.</p> <p>The Construction Contractor will ensure early notice to villages and residents prior to major project activities that could affect them.</p> <p>The Construction Contractor will undertake public education/ awareness raising sessions with high-risk groups (e.g. herders, for example, encourage herders not to leave small livestock unattended).</p> <p>Records will be maintained of all engagement activities.</p> <p>The Construction contractor will provide weekly, monthly, quarterly and annual reports to the PIU on stakeholder engagement and grievances.</p> <p>The CSEP will be reviewed during construction at a minimum of every six</p>	Compliance with EBRD requirements.	EBRD PR1, PR10.	Construction Contractor.	Develop prior to construction on site. Implement during construction.	<p>CSEP to be developed by the Construction Contractor and approved by PIU.</p> <p>Records of disclosure of the CSEP.</p> <p>CLO appointed.</p> <p>Records of disclosure of the CSEP.</p> <p>Records of stakeholder engagement to be maintained.</p> <p>Weekly, monthly, quarterly and annual reports.</p> <p>Updated CSEP, as relevant following 6-monthly reviews.</p>	

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	months, or at a frequency agreed with EBRD and the MoE/PIU.						
	<p>Grievance Mechanism</p> <p>A community liaison officer (CLO) will be appointed by the PIU to assist the Construction Contractor in coordinating engagement with project stakeholders and address any requests and grievance they might have in relation to the project.</p> <p>A project-specific grievance channel will be set up on the MoE website and managed by the MoE PIU.</p> <p>The PIU CLO will inform the MoE of any grievances.</p> <p>The PIU will be responsible for ensuring that the local government/officials are involved in addressing grievances, where applicable and where necessary, a joint team can be set up to investigate the grievance.</p> <p>The PIU CLO will compile a report summarising stakeholder engagement and grievance management results on a bi-annual and annual basis during construction. This report will provide a summary of all public consultation and engagement, grievances, resolution and outcomes.</p>	Compliance with EBRD requirements.	EBRD PR1, PR10.	PIU.	Develop prior to construction on site. Implement during construction.	<p>Grievance mechanism log and records to be maintained.</p> <p>PIU CLO in place.</p> <p>Bi-annual and annual stakeholder report.</p> <p>Submission of Annual Environmental and Social Report (AESR) to EBRD during Project life.</p>	
	<p>Grievance Mechanism</p> <p>The Construction Contractor will set up a Community grievance mechanism during construction. The local community will be able to log grievances directly with the Construction Contractor before the grievance is escalated, if applicable, to a judicial or other national process.</p> <p>The grievance mechanism will be made public through:</p> <ul style="list-style-type: none"> Local posters and mechanisms such as Facebook and the MoE website; 	Compliance with EBRD requirements.	EBRD PR1, PR10.	Construction Contractor.	Develop prior to construction on site. Implement during construction.	<p>Grievance mechanism log and records to be maintained.</p> <p>Evidence of disclosure of grievance mechanism.</p> <p>Monthly, quarterly and annual reports on stakeholder engagement and grievances.</p> <p>Weekly, monthly, quarterly and annual reports.</p>	

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	<ul style="list-style-type: none"> Local information boards (as applicable); Stakeholder and community meetings; By informing the Khurals and Governors; and Regular reporting/awareness raising to the Community. <p>The CLO and trained members of the Construction Contractor staff will record grievance information in a grievance database and share this with the PIU.</p> <p>Records will be maintained of all grievances.</p> <p>The Construction contractor will provide monthly, quarterly and annual reports to the PIU on stakeholder engagement and grievances.</p>						
10.2	<p>Operation Phase SEP and Operational Grievance Mechanism</p> <p>Develop and implement O&M stage SEP. Manage and review O&M contractors stakeholder engagement performance.</p> <p>Educational meetings will be held with local communities and herder households in relation to safety and the risks associated with higher voltage lines. This should include education/public outreach to inform and refresh local people's knowledge regarding restriction zone requirements, prior to operation of the line and following any serious incidences.</p> <p>The NPTG will compile a report summarising stakeholder engagement an annual basis during operation. This report will provide a summary of all public consultation and engagement, grievances, resolution and outcomes.</p>	Compliance with EBRD requirements.	EBRD PR1, PR10.	NPTG.	Prior to and during operation.	<p>O&M SEP.</p> <p>Records of community meetings on H&S aspects, prior to operation.</p> <p>Annual stakeholder report.</p>	

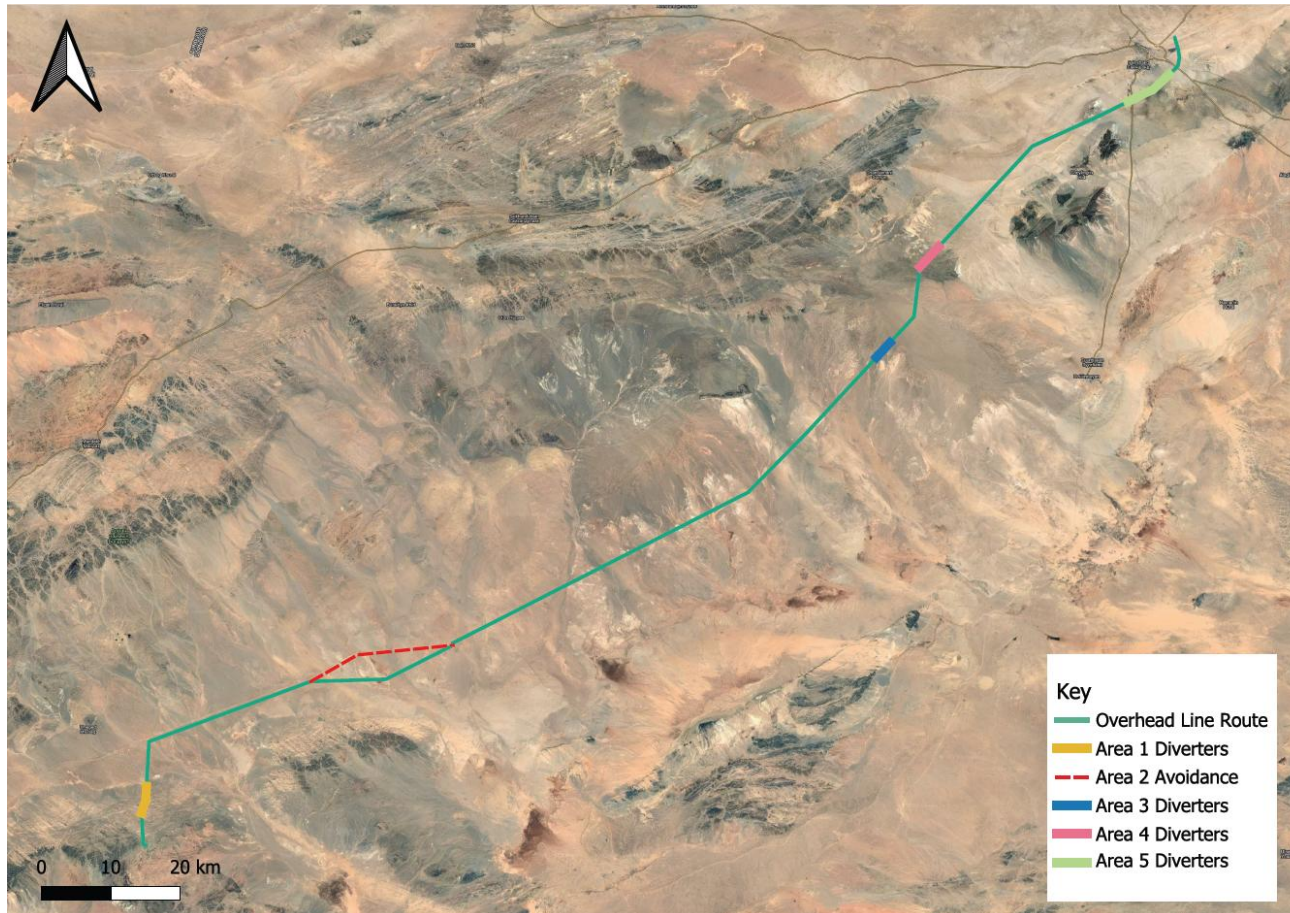


Figure 1 Recommended Route Adjustment and Location of Divertors

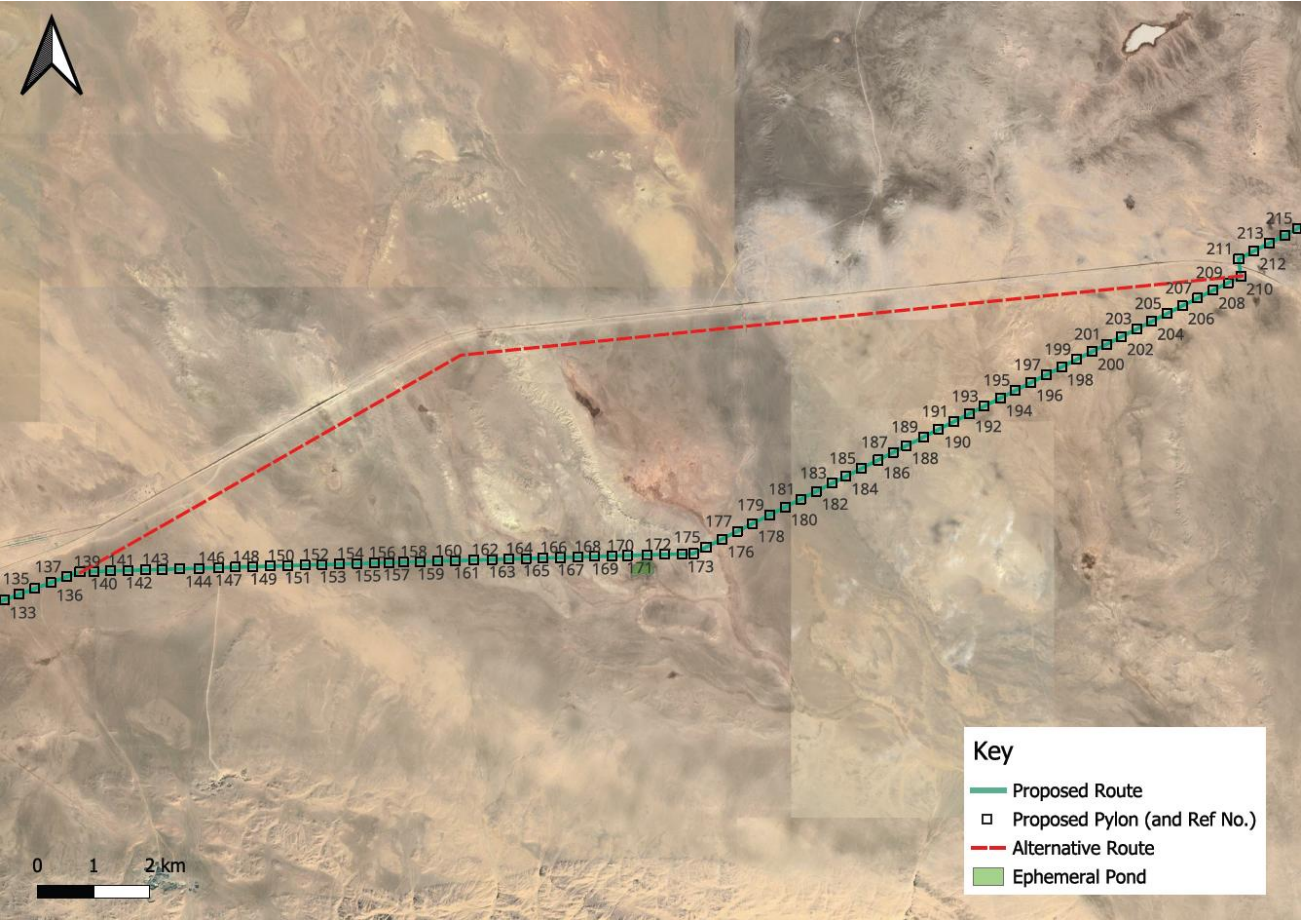


Figure 2 Recommended Route Adjustment