

Sainshand – Tsagaan Suvarga Transmission Line Project

Environmental and Social Management Plan

DECEMBER 2025



Sainshand – Tsagaan suvurga Transmission Line Project

Environmental and Social Management Plan (ESMP)

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Appendix I

Construction Workers' Accommodation Checklist

Construction Workers' Accommodation Checklist

Abbreviations

AH	Asian highway
CES	Central Energy System
CESMP	Construction Environmental and Social Management Plan
CLO	Community Liaison Officer
DEIA	Detailed Environmental Impact Assessment
EBRD	European Bank for Reconstruction and Development
EMF	Electro-magnetic field
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESHS	environmental, social health and safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GBVH	Gender based violence and harassment
GEIA	General Environmental Impact Assessment
HR	Human Resources
H&S	Health and Safety
HVAC	heating, ventilation, and air conditioning
ILO	International Labour Organisation
kV	kilovolt
LARF	Land Acquisition and Resettlement Framework
LPA	Local Protection Area
LRP	Livelihood Restoration Plan
MECC	Ministry of Environment and Climate Change

MNS	Mongolia National Standards
MoE	Ministry of Energy
NRMM	non-road mobile machinery
NPTG	National Power Transmission Grid
NTS	Non-Technical Summary
OESMP	Operational Environmental and Social Management Plan
OHS	Occupational health and safety
OHTL	overhead transmission line
O&M	Operation and Maintenance
PIU	Project Implementation Unit
PPE	Personal protective equipment
PR	Performance requirement
RAP	Resettlement Action Plan
RoW	Right of Way
SEAH	sexual exploitation, abuse and harassment
SEP	Stakeholder Engagement Plan
STD	Sexually Transmitted Disease

1 Introduction

1.1 Background

- 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 220/35/22kV substation operated by the National Power Transmission Grid (NPTG), located within Tsagaan Suvarga mine licence area. The 204km OHTL and substation connections are herein referred to as ‘the Project’. The OHTL will interconnect two transmission corridors within Mongolia’s Central Energy System, improving the reliability and resilience of the network.
- 1.1.2 The EBRD has categorised the Project as a Category A, which means that a comprehensive Environmental and Social Impact Assessment (ESIA) of the Project must be undertaken and an ESIA Disclosure Package prepared. This document presents the Environmental and Social Management Plan (ESMP) of the Project. The ESMP forms one of several documents prepared to meet EBRD disclosure package requirements, as shown in **Figure 1-1**. This ESMP will be integral to the Project Environmental and Social Management System (ESMS) to identify and control environmental and social risks of the Project.

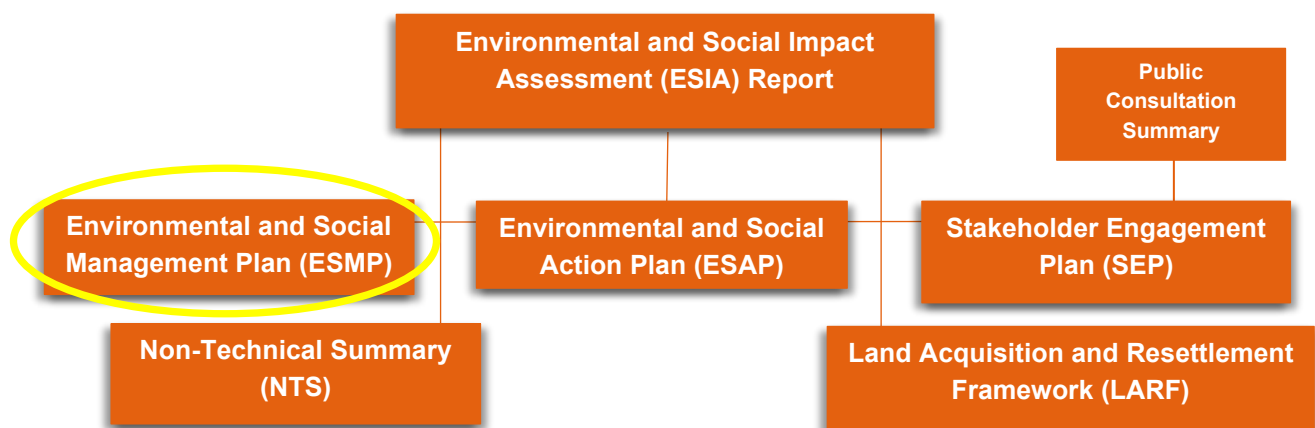


Figure 1-1 ESIA Disclosure Package Structure

1.2 Objectives

- 1.2.1 The objectives of this ESMP are to:
- Set out the key environmental and social issues or sensitivities, and the identified mitigation measures, in relation to the Project;
 - Set out measures for monitoring that need to be developed and implemented;
 - Ensure that the roles and responsibilities in relation to implementation of mitigation and monitoring measures are identified;

- Propose measures, targets and/or indicators for compliance monitoring of the implementation of the Project;
- Measure the success of proposed mitigation measures in minimising and/or reducing potential environmental, health, safety and social impacts;
- Ensure that the project will comply with EBRD's 2019 ESP and PRs and relevant Mongolian environmental and social legislation and throughout its design, construction and operational phases;
- Ensure that the Project will be developed and operated in accordance with Directive 2014/52/EU of the European Parliament and of the Council amending Directive 2011/92/EU on the Assessment of the Effects of Certain Public and Private Projects on the Environment (herein referred to as EIA Directive);
- Continuously control the changes to environmental, health, safety and social conditions during pre-construction, construction and operation activities;
- Facilitate a continual review of activities based on performance data and consultation feedback; and
- Implement corrective actions or new adaptive management programs, as required.

1.2.2 This document represents a commitment by the Ministry of Energy (MoE) and National Power Transmission Grid (NPTG), which will also apply to their contractors and sub-contractors, and supply chain, to environmental and social sustainability. It applies to the Project's entire lifecycle.

1.2.3 The potential impacts and associated mitigation measures and management procedures in this ESMP are based on the information and assessments provided in the ESIA, Stakeholder Engagement Plan (SEP) and Land Acquisition and Resettlement Framework (LARF) prepared for the Project.

1.3 Intended Users

1.3.1 This document sets out how the MoE and NPTG (including their contractors and sub-contractors) will manage and reduce the potential environmental, health and social issues associated with the Project, and the procedures and mitigation measures that are required to be implemented. Its requirements are applicable to all Project personnel, including the MoE and the Project Implementation Unit (PIU), NPTG, Construction Contractor, sub-contractors, site visitors and/or Operation and Maintenance (O&M) contractors.

1.3.2 The Construction Contractor will be required to prepare a detailed Construction ESMP (CESMP), incorporating the requirements set out in this ESMP and within the relevant ESIA Disclosure documents.

2 The Project

2.1 Location

2.1.1 The site location is shown in **Figure 2-1**. The Project is located in Dornogovi aimag. It starts at the new 220/110/35 kV substation in Sainshand that is being constructed as part of the EBRD-funded Choir-Sainshand OHTL project. The Project OHTL then proceeds south-west, crossing four soums (districts) -Sainshand, Ulaanbadrakh, Saikhandulaan and Mandakh- before reaching the existing 220/35 kV substation at Tsagaan Suvarga. Sainshand city is the administrative capital of Dornogovi aimag and is located approximately 415km south-east of the capital, Ulaanbaatar. Tsagaan Suvarga is the location of a mine in the west of Dornogovi aimag (province), approximately 180km south-west of Sainshand city.

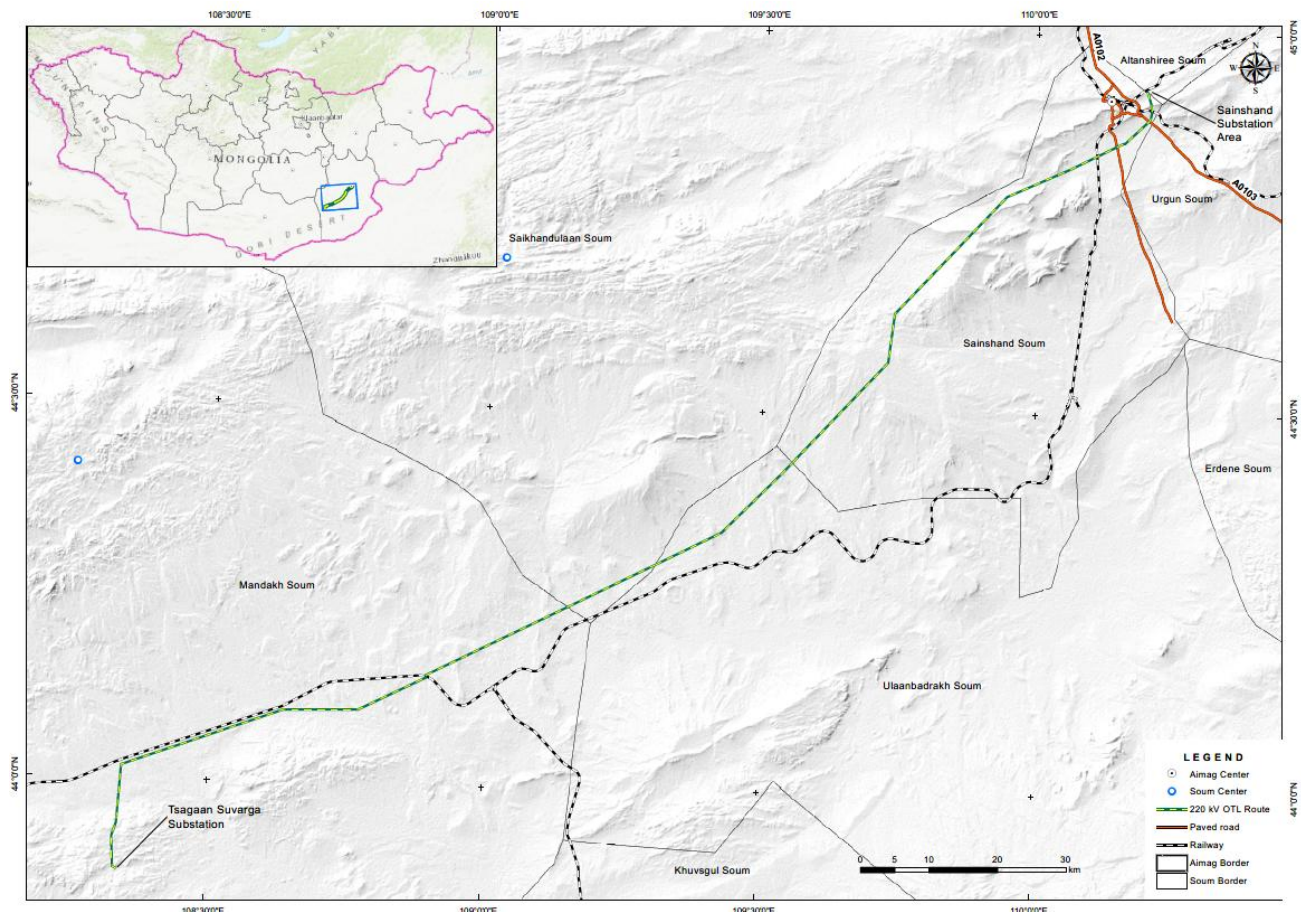


Figure 2-1 Project Location

- 2.1.2 In general, the route proposed for the transmission line is sparsely populated and has desert vegetation characteristics of the Gobi Desert. The nearest permanent settlement is Sainshand city (approximately 4.4km at its nearest point), then Zuun-Bayan and Mandakh, approximately 26km and 43km away respectively from the Project. There is also a Student Military Training Centre near Zuun-Bayan (22km from the Project route).
- 2.1.3 Dornogovi aimag is connected to Ulaanbaatar by paved road A0101 and A0102, a part of the Asian Highway 3 (AH3). AH3 connects Mongolia's northern border with Russia at Altanbulag and southern border with the People's Republic of China at Zamyn-Uud. The aimag centre and soum centres all have paved roads, though the Project soums are connected to each other by a mixture of paved roads (soums along the AH3) and unpaved (earth) roads (from Sainshand to other aimag towns). There is no direct paved access along the Project route.
- 2.1.4 The Trans-Mongolian Railway, forms a major socio-economic connection with Russia and China, connects the Trans-Siberian Railway from Ulan-Ude in Russia to Erenhot and Beijing in China through the capital Ulaanbaatar. The Mongolian section of this line runs for 1,110km. A 27km industrial purpose railway line also connects Sainshand with Altanshiree soum, Dornogovi aimag, to allow development of the Mongolian oil refinery under construction in Altanshiree soum.

2.2 Proposed Works

Transmission Line

- 2.2.1 The transmission line comprises a 204km 220kV double circuit overhead line. This circuit will have no tee off connections at any point, which will help to improve transmission between the two substations. The conductor wire will be AS-400/51, the groundwire jd70-2000. A 48 core optical cable and lighting protection cable will also be provided (specification OKT-Ц-a-48). The towers and lines for the transmission lines will be made from steel and aluminium; with materials sourced from international companies.
- 2.2.2 As the OHTL route will require changes in direction and elevation, different tower types are required depending on whether the power line maintains a constant direction or a change in angle or elevation. The Project will require 690 towers, as summarised in **Table 2-1** and **Figure 2-2**. The towers range in height between 36m to 41.5m. The foundation specifications for the different towers are shown in **Figure 2-3**. There is a variation in distance between individual towers that accounts for differences in surface elevation along the route and the characteristics of the terrain (rocks, dry stream beds, hills, and valleys), ranging from 139m to 323m for the anchor span and 139m to 7,449m for the transition span.

Table 2-1 Overhead transmission line towers

Type (see Figure 2-2)	Foundation System (see Figure 2-3)	Quantity	Height
PS220-2/ΠC220-2	4xΦ3-2, 4xAP-6	612	36m
PS220-2/ΠC220-6	4xΦ3-2, 4xAP-6	31	41.5 m

Type (see Figure 2-2)	Foundation System (see Figure 2-3)	Quantity	Height
U220-2/Y220-2	4xΦ5-AM, 16xAP-6	31	31.6 m
U220-2+5/Y220-2+5	4xΦ5-AM, 16xAP-6	7	36.2 m
U220-2+9/Y220-2+9	4xΦ5-AM, 16xAP-6	8	40.6 m
U220-2+9/Y220-2+9	4xΦ3-2, 4xAP-6	1	40.6 m

Хэлхээний тоо	Хоёр хэлхээт	Хоёр хэлхээт	Хоёр хэлхээт	Хоёр хэлхээт	Хоёр хэлхээт
Тулгуурын төрөл	Завсрын тулгуур	Завсрын тулгуур	Эргэлтийн ба таталтын анкер тулгуур	Эргэлтийн ба таталтын анкер тулгуур	Эргэлтийн ба таталтын анкер тулгуур
Мөсжилтийн район	III-IV	I-IV	I-IV	I-IV	I-IV
Дамжуулагчийн хэлбэр	АС-300/39, АС-400/51	АС-300/39, АС-400/51	АС-300/39, АС-400/51	АС-300/39, АС-400/51	АС-300/39, АС-400/51
Троссын хэлбэр	ОКГТ-Ц-А-48 G.652D-14,0	ОКГТ-Ц-А-48 G.652D-14,0	ОКГТ-Ц-А-48 G.652D-14,0	ОКГТ-Ц-А-48 G.652D-14,0	ОКГТ-Ц-А-48 G.652D-14,0
Төрөл					
Тулгуурын маяг	ПС 220-2	ПС 220-6	У220-2	У220-2+5	У220-2+9
Тулгуурын жин, кг	Цинкгүй	5503	8467	14398	17603
	Цинктэй	5517	8798	14981	18290
					19486
					20245

Figure 2-2 Tension Towers

Foundation Specification Sheet

Foundation type	$\Phi 3$	$\Phi 5$	AP-6
Model			
Type	$\Phi 3-2$	$\Phi 5-AM$	AP-6
Pylon	(P) П220-2	(U) У220-2, У220-2+5, У220-2+9	П220-2, ПС220-6, У220-2, У220-2+5, У220-2+9
Page number	(MP) МП-020-21-И-3-11-1	(MP) МП-020-21-И-3-9	(MP) МП-020-21-И-3-13
Height, m	2.7	3.1	3.5
Area of foundation, m	1.8x1.8	2.7x2.7	0.5x0.2
Area of foundation, m	1.8x1.8	2.7x2.7	2.7x2.7
Installation depth, m	2.5	3	-
Volume of steel-reinforced concrete, m ³	1.11	2.5	0.275
Weight of steel, kg	133	587	760

Figure 2-3 Tower foundation specifications

2.2.3 The construction of the foundations will be undertaken in accordance with national regulations on construction (BND20-03-11 and 20- 02-11) to protect steel and reinforced concrete structures from collapse. As identified above, two types of two types of foundation system will be used: '4x $\Phi 5-AM$ ' and '4x $\Phi 3-2$ '. The AP-6 element is a horizontal reinforced concrete component, which is integrated into the foundation to provide additional structural support. The tower foundations or these are shown in **Figure 2-4**. Concrete foundation footings for towers and portals and concrete cable trays will be purchased from domestic producers and be transported to the project site. On average, four to six tower foundation footings can be loaded and transported by a truck trailer.

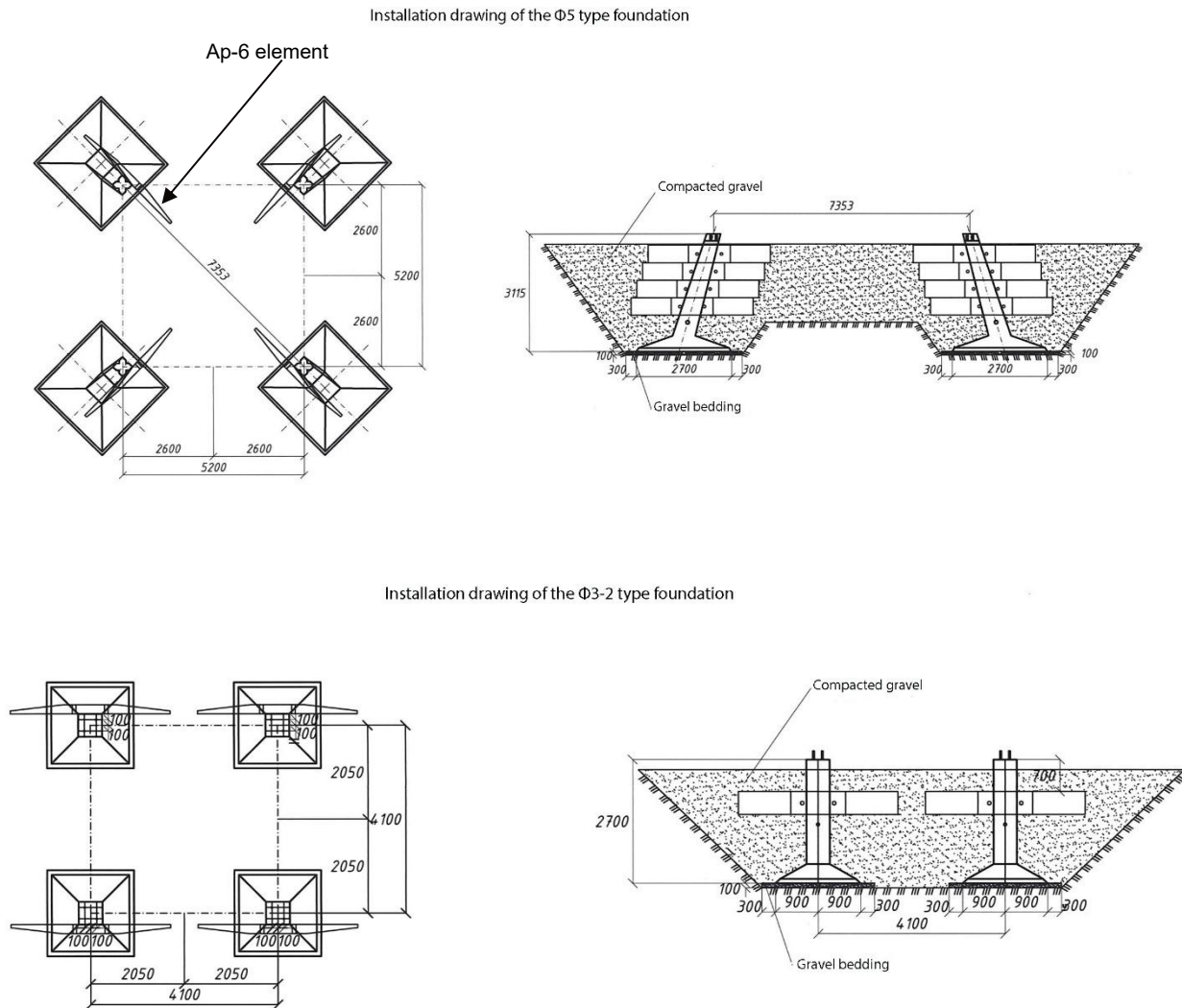


Figure 2-4 Indicative installation drawing for tower foundations

Sainshand Substation

2.2.4 The location of the planned substation that will be constructed as part of the Choir-Sainshand OHTL Project is shown in **Figure 2-5**. This substation is due to be constructed before the Project (i.e. the Sainshand – Tsagaan Suvarga project) commences construction. Full details of the equipment required at this substation have not been provided to date, however, are likely to include:

- 220/110/35 kV autotransformers with 200 mega volt ampere (MVA) capacity;
- 220 kV distribution equipment;
- Transformer for internal use;
- Direct Current (DC) system;
- Cables;
- Lighting;
- Lightning rod;

- Control system;
- Relay and automation system;
- Security camera;
- System for protecting natural disaster; and
- Communications system.

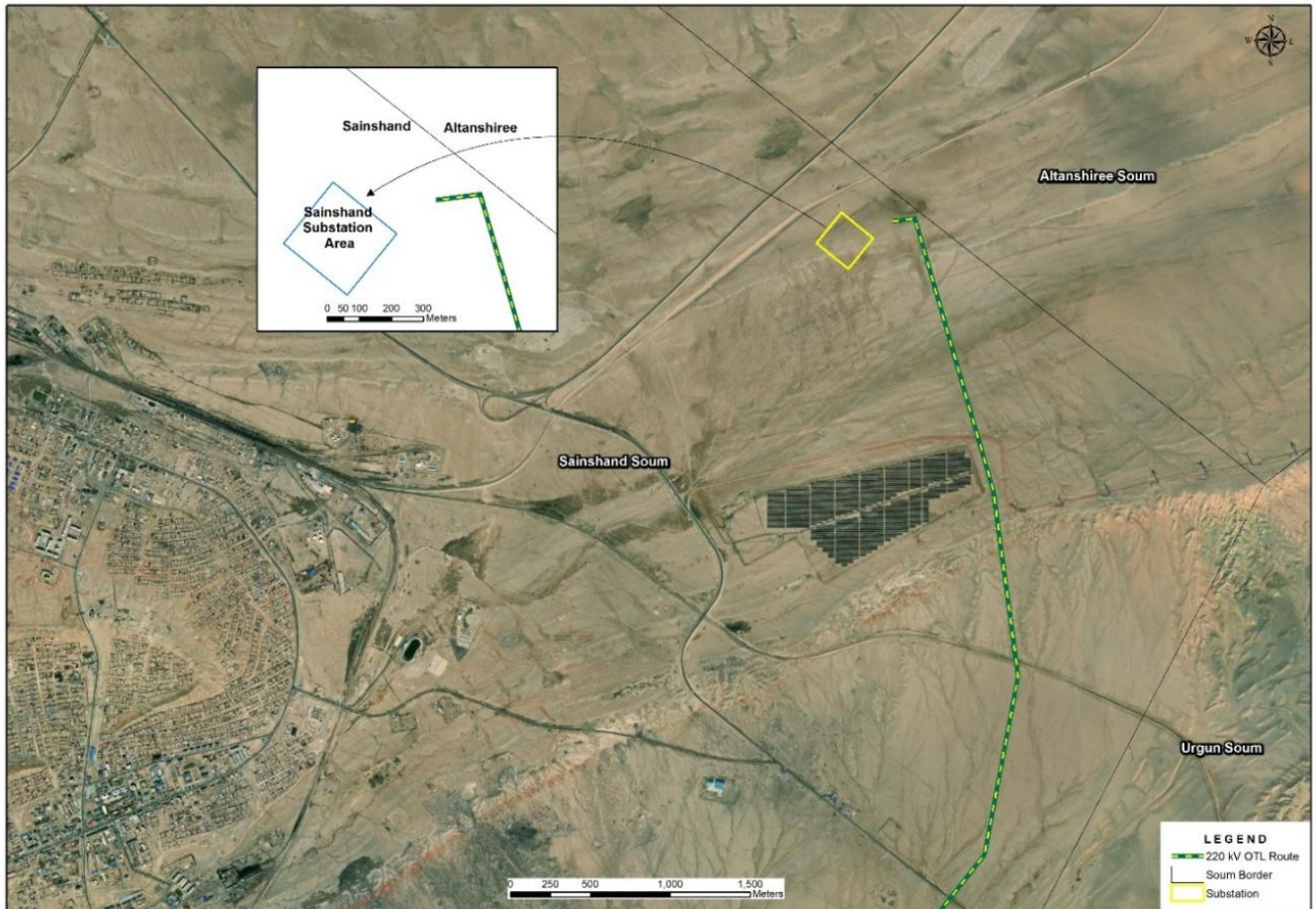


Figure 2-5 Sainshand substation location

Tsagaan Suvarga Substation

- 2.2.5 The Project will connect to the existing Tsagaan Suvarga substation, which is located within the Tsagaan Suvarga mining license area and adjacent the mine itself owned and operated by Mongolian Alt Corporation (MAK) (**Figure 2-6**). Whilst the substation is owned and operated by the NPTG, it is located on land owned by MAK. The Government of Mongolia is currently in negotiation with MAK to become a shareholder of the mine. As part of this negotiation, the land within the substation would be transferred to state ownership (i.e. NPTG) under a concession agreement. It is anticipated that this concession agreement will be in place by 2026.
- 2.2.6 There are five existing grid connections to/from Tsagaan Suvarga substation; the 22 kV OHTL from this substation provides power to consumers in Khatanbulag soum in Dornogovi aimag. An area within the substation has been identified for the Project connection.

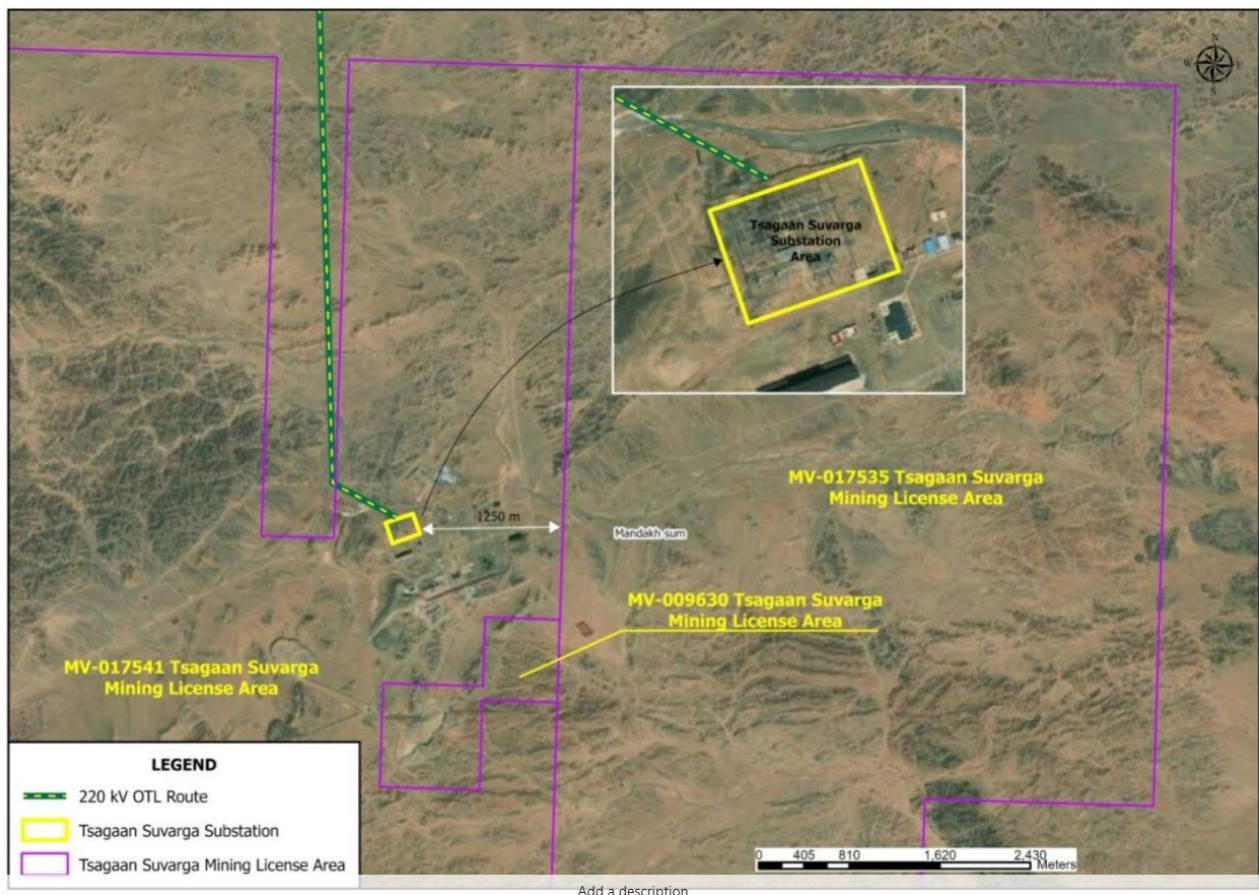


Figure 2-6 Tsagaan Suvarga substation location

- 2.2.7 The Tsagaan Suvarga substation equipment required specifically for this Project will include transformers and associated equipment:
- 220kV SF₆ Gas Circuit Breaker
 - Rated voltage: 252 kV, Frequency: 50 Hz
 - Rated current: 4000 A, Short-circuit current: 50 kA

- 220kV Three-Pole Disconnecter with Two Earthing Blades (Dry Type)
 - Rated voltage: 123 kV, Frequency: 50 Hz
 - Rated current: 2500 A, Short-circuit current: 50 kA
- 220kV Three-Pole Disconnecter with One Earthing Blade (Dry Type)
 - Rated voltage: 123 kV, Frequency: 50 Hz
 - Rated current: 2500 A, Short-circuit current: 50 kA
- 220kV Single-Pole Disconnecter with One Earthing Blade (Dry Type)
 - Rated voltage: 123 kV, Frequency: 50 Hz
 - Rated current: 2500 A, Short-circuit current: 50 kA
- 220kV Surge Arrester
- 220kV Single-Phase Capacitive Voltage Transformer
- Three windings, Rated voltage: 220 kV, Frequency: 50 Hz
 - Accuracy class: 0.5 / Protection (ZP)
 - Burden capacity: 30 / 80 VA
- 220kV Current Transformer
 - Rated voltage: 220 kV, Frequency: 50 Hz
 - Secondary winding accuracy classes: 0.2S / 0.5 / 10P / 10P / 10P
 - Burden: 30 / 30 / 50 / 50 / 50 VA
 - Transformation ratio: 1000 / 5 A
- Control and Monitoring Systems
 - Complete Set of 220kV Line Relay Protection and Automation Panel
 - Complete Synchronous Monitoring Panel
 - Complete Communication Panel
 - Fiber Optic Communication System

2.3 Establishment of the Right of Way

- 2.3.1 The Mongolia Law on Energy 2001, as amended, states that Governors should take measures to evacuate buildings and facilities constructed within the protection strip of linear energy infrastructure, including measures to remove households, trees, shrubs and they should also take measures to protect the safety zone [referred to as the Right of Way (RoW) within this document]. Article 33 of the Law covers the boundaries of network safety zones and states that lines and networks should have established boundaries of their safety zones, within which is prohibited to build any *gers*, housing or building or conduct any activities other than those permitted by the network owners or possessors within such boundaries; it does not state the type of activities that are or are not permitted.
- 2.3.2 The Mongolian Government Resolution No. 97 of 18 March 2020 also stipulates the establishment of protection zones for transmission lines, in line with Article 33 of the Law on Energy. It states that the Governor of the aimag, soum, or district will establish this protective zone based on a request submitted by the entity or organization possessing the power grid and the power grid zone map. It also states that a decision (permission) should be obtained from the Governor of the aimag soum, and district on the location of the power grid protection strip and determination of the protection strip. However, the Resolution also sets out specific safety zones as provided in **Table 2-2**.

Table 2-2 Right of Way for transmission lines in Mongolia

Powerline, kV	Unpopulated areas	Populated areas	Substation and distribution infrastructure	Forested areas and Parks
	From the outside of the tower, m		Every direction, m	From the outside of the tower, m
220 kV	25m	6m	25m	4m

- 2.3.3 The Resolution also stipulates that it is prohibited to construct buildings, apartments, homes, fences, or conduct any activities within the protection strip except those permitted by the network owner. Activities that disrupt the operation and regime of the energy line network and equipment in the protective zone are prohibited. No trees and any agricultural plantation are allowed within 25m surrounding substations or any power distribution infrastructure.
- 2.3.4 Article 5.1 states that the implementation of the Regulation will be by the Governors of aimags, soums, and districts, energy regulators and state inspectors, and business entities and organizations that own energy networks.
- 2.3.5 It is also noted that the Resolution requires that, after carrying out earthworks within the protective zone, the area of the protective zone will be restored to its normal condition.

2.4 OHTL Crossings

- 2.4.1 A review by the ESIA Team indicates that the route corridor will pass over the following items. There are also a number of herder camps and wells along the route. These are all shown in the figures in **Appendix A**. In summary, the route currently crosses:
- Communication and information transmission lines – 9
 - 10kV OHTL – 3
 - 35kV OHTL – 5
 - 110kV OHTL – 4
 - Fibre optic cables – 6
 - Paved roads – 3
 - Dirt roads – 6
 - Railway – 3

2.5 Land Acquisition

- 2.5.1 In line with the Law on Land and the Resolution above, the NPTG as the final operator of the transmission line will need to secure possession rights for the OHTL route and its RoW. This will entail confirming the final route of the line and an Application for Land Possession as set out in the Law on Land.

- 2.5.2 Prior to this, the NPTG will need to agree with the land owners and users along the route that the land can be used for the Project, including any land required that affects local herder camps or their assets. This is discussed in more detail in the LARF.
- 2.5.3 There are no residential structures or other structures within the OHTL route or its RoW, though there are water wells and herder households (and associated *gers*) within a 25m-1km buffer zone either side of the OHTL centreline (2km buffer zone in total). Within the substation site and 25m around both the existing and proposed substation connections, there are no buildings or structures (other than the existing substation structures at Tsagaan Suvarga).
- 2.5.4 The NPTG or nominated party will also ensure that appropriate agreement is reached with the relevant infrastructure owners where the route crosses other infrastructure; and all relevant operating criteria will be employed on the Project. This may include obtaining the necessary permissions to cross or work those, and either agree crossing methods or compensate for works conducted by those operators/owners during the crossing to minimise disruption to their use during construction.

2.6 Construction

- 2.6.1 At the time of writing, no information is available on whether the Construction Contractor will use workers' accommodation camps and also on any details of other temporary sites such as works areas, compounds and access roads. The PIU has proposed that a main camp and workers' accommodation would be located near to Sainshand substation, with smaller camps being used along the OHTL route during the period in which nearby work is completed. As an indicative number, one secondary camp per 100km of route is a standard procedure, therefore around two or three camps are anticipated.
- 2.6.2 Given the precise location is not currently known, the Construction Contractor will be required to select sites based on minimal environmental and social impacts, avoiding, or if this is not possible, minimising, economic or physical displacement, in line with the requirements set out in this ESIA, the ESMP and the LARF. The Construction Contractor will also be required to assess final sites chosen so that, where necessary, additional mitigation measures can be applied to reduce adverse impacts. The Construction Contractor will be required to:
- (i) undertake environmental and social screening of any temporary sites (e.g., workers' accommodation camp, lay down areas, etc.), to the approval of MoE/PIU and EBRD;
 - (ii) develop land entry and land exit procedures/protocols to facilitate land/site hand-over at the end of construction;
 - (iii) pre-construction surveys, as outlined in the ESMP; and
 - (iv) develop a detailed set of mitigation measures that are incorporated into the CESMP.
- 2.6.3 E&S screening requirements are set out in **Appendix B**.

Construction Programme

- 2.6.4 The Project tendering and contract award programme is not currently known. Construction is currently anticipated to take approximately 24 months starting in 2026. This construction programme allows for pre- and post-construction activities such as mobilisation, enabling works, testing and commissioning. A detailed construction programme will be prepared by the appointed Construction Contractor.

Key Construction Activities

2.6.5 Details of the workforce and equipment required during the construction phase will be determined by the Construction Contractor once appointed. However, typical site installation and preparatory work for overhead transmission line projects includes:

- Development of the lay down areas, work compounds and workers' accommodation camp, including power generation where required;
- Mobilisation of supplies and materials necessary for construction (vehicles, trucks, construction equipment) to site;
- Temporary signage and the setting up of deviations where necessary;
- Levelling and excavation of pole and tower foundations - topsoil will be stripped from areas of excavation prior to any further excavation which may be required. The proposed pole/tower base areas will be levelled; where possible, cut soil will be used for levelling the site to design levels.
- Erection of towers/poles - the towers will be erected with cranes;
- Stringing of lines - once the towers/poles are erected, the conductors and shield wires will be strung and appropriately 'tensioned' to provide the minimum clearance between ground level and the wires. In most cases, conductors will be strung by manual labour. When oversailing properties, overhead line conductors will be strung between the towers with scaffolding;
- Civil works and installation of substation equipment at both substations;
- Temporary power generation;
- Waste management; and
- Testing and first operation of equipment - once the poles/towers have been erected and the lines strung, tests and measurements will be carried out to ensure that the line performs as expected. Minimum distances such as clearance between the lines and the ground level shall be checked and the lines shall be 'tensioned' as per specifications.

2.6.6 The types of equipment that will be required includes:

- Tractor 96/130
- Tractor-mounted crane
- Tractor 30-2621
- Electric winch
- Machine with ladder
- Conductor tensioning/filling unit
- Bulldozer
- Truck crane 5 tons
- Truck crane 6.3 tons
- Truck crane 16 tons
- Truck crane 10 tons
- Automobile / Vehicle
- Cargo truck
- Welding machine



- Compressor
- Demolition hammer
- Drilling machine
- High-productivity excavator (0.5 m³)
- Service vehicle
- Bulldozer with 140 horsepower

Materials Use

- 2.6.7 The construction phase will result in the consumption of natural and non-renewable resources. Limited quantities of sand and aggregates may be required for tower construction and substation bases and will be sourced from local suppliers as needed. The volumes are not anticipated to be such to reduce available materials supply.
- 2.6.8 The PIU also confirmed that materials used for the towers are typically imported from China, supplemented by select items sourced from the local market. Specific procurement details will be clarified during the tender process.

3 Roles and Responsibilities

- 3.1.1 A summary of the relevant responsible bodies is provided in **Table 3-1**. The detailed organisational structure for the Project delivery shall be developed following agreement of the loan and once the Construction Contractor is appointed. Further details on the management of the Construction Contractor are provided in **Appendix C**.

Table 3-1 Project Proponent and Project Organisations

Organisation	Project Function	Report To
EBRD, the Lender	The EBRD will potentially finance this Project. Responsibility for Project delivery will be with the Project Owner; however, reports will be required to be submitted to EBRD on the status of the ESAP, resolution of grievances and ESMS and OHS Project performance. The EBRD will require the submission of reports that monitor the environmental and social performance of the Project against its set of specific PRs for key areas of environmental and social sustainability.	EBRD Board
MoE, the Project Owner	<p>The MoE is responsible for energy sector policy and for associated infrastructure development in Mongolia. They are the loan beneficiary, responsible for developing and implementing the Project, including any land acquisition. The MoE has ultimate responsibility for the Project and will oversee the implementation of the EBRD project requirements during construction, overseeing the Construction Contractor, sub-contractors and other involved third parties. They will be responsible for creating a PIU to implement the Project.</p> <p>During pre-construction, the MoE will need to obtain the national EIA permit for the proposed works. This includes both the delivery of a General (GEIA) and Detailed Environmental Impact Assessment (DEIA). At the time of writing, a consultant has been commissioned the MoE is currently working to submit GEIA request to the Ministry of Environment and Climate Change for approval. Once approved, the DEIA will be prepared, followed by a public consultation. Based on the outcome of the consultation, the DEIA will be revised and subsequently resubmitted to the Ministry of Environment and Climate Change for final approval.</p> <p>The MoE will also ultimately be responsible for physical and economic displacement reporting. The land acquisition process should fully meet EBRD's PR 5 Land Acquisition, Involuntary Resettlement and Economic Displacement. A LARF has been prepared to report on the activities to date and sets out further actions that will need to be taken to meet EBRD requirements. A Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP) may be required, depending on the final positioning of towers and associated RoW. Overall, no physical or economic displacement has been identified to date with mitigation measures in place but, given the transient nature of herder camps, this will need</p>	<p>Government</p> <p>EBRD</p>

Organisation	Project Function	Report To
	<p>to be confirmed prior to construction on site and taking into account the final tower locations.</p> <p>The MoE will select a Construction Contractor. The ESIA Disclosure Package, including this ESMP, will form part of the contract requirement for the Construction Contractor.</p>	
NPTG	<p>The NPTG is a state-owned stock company in charge of power transmission in the Central Energy System. The NPTG will have ultimate responsibility for the O&M phase of the project, overseeing any O&M contractors, sub-contractors and other involved third parties. They will also be responsible the implementation of the O&M Environmental and Social Management Plan (O&M ESMP).</p>	<p>Government</p> <p>EBRD</p>
Master Point LLC	<p>Mongolian OHTL engineering contractors. Prepared the detailed design for the Project on behalf of the MoE in 2021.</p>	MoE
PIU (to be appointed)	<p>The PIU will be responsible for the implementation, financial management and overall delivery of the project. They will be responsible for the overall implementation of the mitigation measures and requirements, specified within the disclosure package for the Project, including implementing the ESMS. They will be required to oversee the preparation and implementation of the Contractor's CESMP, which will be developed by the Contractor to ensure they fulfil all the identified construction phase environmental, health, safety and social requirements under the loan agreement for the Project.</p> <p>The PIU will be responsible for ensuring roles and responsibilities are clearly identified and allocated for environmental, health, safety and social, both within the PIU itself, and within the Construction Contractors' arrangements, including sub-contractors and contracted organisations.</p> <p>The PIU will be responsible for appointing technical specialists to effectively audit the implementation of environmental, social, and health and safety measures and processes. Specialists include:</p> <ul style="list-style-type: none"> • Community Liaison Officer (CLO) - Responsible for conducting regular consultations with affected communities on any concern regarding the Project. • Environmental Supervisor - will be responsible for regularly auditing the implementation of this ESMP. They will be suitably competent, have a knowledge of archaeology, heritage and biodiversity, and have a strong understanding of environmental best practice. • Health and Safety Specialist - Responsible for regularly auditing health and safety practices. They will be suitably competent, have a knowledge of construction health and safety issues. • Supply Chain Manager - Responsible for managing the supply chain. 	<p>EBRD</p> <p>MoE</p>

Organisation	Project Function	Report To
	<ul style="list-style-type: none"> Gender-based Violence and Harassment *GBVH) specialist – responsible for implementing gender quality and monitoring GBVH issues. Social Specialist - Responsible for implementing the LARF. 	
Supervising Engineer (to be appointed)	Responsible for supervising the Contractor to ensure that recommendations and requirements, as set out in this ESMP and other documentation are applied. They will be responsible for continuous monitoring of the processes and activities undertaken by the Construction Contractor and specifying measures to be implemented by the Construction Contractor, to address any areas of non-compliance.	MoE
Construction Contractor (to be appointed)	A Construction Contractor will be appointed for the construction of the works. The Construction Contractor shall provide sufficient staffing to manage the environmental and social performance of the Project. The Construction Contractor will be expected to prepare the CESMP and undertake monitoring and inspections of their compliance with the Project ESHS documentation, including the CESMP, and the PIU will undertake regular inspections and audits of the Construction Contractor to ensure compliance with the Project environmental and social mitigation measures. Roles required are set out in Section 3.2 below.	MoE PIU
Local government (aimag, soum, bagh)	Support MoE in all permanent and temporary acquisition of land for the Project. Liaise with local communities.	MoE
Regional Departments of various Ministries	Project approval, issue of permits for various construction works.	Ministries
Consultants	Surveys and studies. Preparation of the DEIA for national approvals.	MoE EBRD
Operation and maintenance (O&M) contractors	Contractor for various O&M activities.	NPTG

- 3.1.2 It is understood that no further detail design is planned. However, the final route will need to be determined by the MoE/PIU and the Construction Contractor, based on the negotiations with land owners and users and taking into account the mitigation measures as set out in the ESIA, including alterations to the route to avoid significant ecological impacts. The PIU will therefore 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 this ESMP can be used as a base to establish whether further assessment is required. The final route should avoid any permanent physical or economic displacement however, there this cannot be achieved a **Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP)** may be required. Further details on these measures are provided in Section 7 of this ESMP and the LARF.

3.2 Construction Contractor Roles and Responsibilities

- 3.2.1 A Construction Contractor will be selected and appointed for the construction of the Project. The Construction Contractor will be responsible for complying with all relevant national and international legislation and adhere to all mitigation measures specified in this ESMP and the relevant ESIA Disclosure documents. The Construction Contractor shall provide sufficient staffing to manage the environmental and social performance of the Project.
- 3.2.2 A **pre-construction survey** will need to be undertaken by the Construction Contractor to capture video/photo description of any sensitive receptors – which according to current surveys would be well structures and *gers* within a 1km distance from the proposed OHTL centreline as well as any other working areas to be used by the Construction Contractor. The purpose of this baseline will be both to (i) verify any changes in the baseline in relation to the baseline set out in the ESIA and to confirm whether additional mitigation measures are required and (ii) to provide a baseline in relation to the construction works, to demonstrate that no additional damage was caused during the construction works so that sites can be “made good” following construction.
- 3.2.3 Tower spotting will need to take place; this refers to the determination of individual sites for the installation of the towers. The Construction Contractor will need to undertake a detailed topographic, soil geotechnical survey of the RoW and to inform this exercise.
- 3.2.4 The location of temporary works areas and any workers’ construction camps will also need to be agreed in liaison with the local government officials and land owners and users; a **Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP)** may be required for the any temporary land take required by the Construction Contractor that results in involuntary economic or physical displacement (permanent or temporary). Further details on these measures are provided in Section 7 of this ESMP and the LARF.
- 3.2.5 Prior to the commencement of construction works the Construction Contractor will be required to prepare the **detailed CESMP** in accordance with this ESMP. A **labour grievance mechanism** should also be established to manage labour grievances during Project construction.

- 3.2.6 Prior to construction, access tracks will need to be established and clearly demarcated to avoid unnecessary damage to vegetation and to manage potential health and safety impacts associated with herders and livestock.
- 3.2.7 During construction, the Construction Contractor will assume overall responsibility for implementation and monitoring of their CESMP (as well as wider contractual obligations). The Construction Contractor will be expected to undertake monitoring and inspections of their compliance with the approved CESMP.
- 3.2.8 All sub-contractors must meet all requirements in relation to the Construction Contractor discharge of their responsibilities in terms of ongoing management of potential environmental and social impacts of all contract activities.
- 3.2.9 The Construction Contractor's organisation must have sufficient, adequate, and competent resources available to fulfil the environmental and social requirements established in the Project ESMP and the detailed CESMP. An overview of these roles and responsibilities is provided in **Table 3-2** and should be developed in detail by the Construction Contractor in their CESMP.

Table 3-2 Construction ESMP Roles and Responsibilities

Role	Overview of Responsibilities
Contractor Project Manager	<p>Specific duties of the Project Manager in relation to this ESMP will include:</p> <ul style="list-style-type: none"> • Overall acceptance and delivery of the CESMP. • Project labour/workforce management together with HR Manager. • Ensuring that hazard and risk assessments are completed. • Ensuring that all supply chains are aware of and comply with the CESMP. • Approval of works instructions, methods, and procedures. • Sign-off where required of Corrective Actions. • Emergency Preparedness and Response Plan.
Contractor Human Resources (HR) Manager	<p>Specific duties of the Contractor HR Manager in relation to this ESMP will include:</p> <ul style="list-style-type: none"> • Project labour/workforce management and contract together with Project Manager. • Development, roll-out and maintenance of Human Resources policies, procedures, and standards. • Public distribution of vacancy announcements. • Recruitment and selection governance. • Developing and maintaining an ongoing Workforce Plan. • Management of any union relationships and communications. • Maintaining the Labour Grievance Mechanism.
Contractor Site Construction Manager	<p>Specific duties of the Site Construction Manager in relation to this ESMP will include:</p> <ul style="list-style-type: none"> • Approval of works instructions, methods and procedures and ensuring their implementation on site. • Ensuring all personnel have the appropriate training to undertake their work, including any specialised training, in liaison with the HSE Manager. • Ensuring all construction plant and vehicles are maintained in accordance with good industry practice and using quality materials and consumables.

Role	Overview of Responsibilities
	<ul style="list-style-type: none"> Actively promoting an Occupational Health and Safety culture that mitigates the risk of injury to personnel and damage to plant, equipment, environment, and heritage aspects of the project. Implementing emergency preparedness and response on sites in accordance with the Emergency Preparedness and Response Plan. Ensuring that any activity that has resulted, or has the potential to result, in an incident, accident or non-compliance has been reported immediately to the H&S Manager.
Health and Safety (H&S) Manager	<p>Specific duties of the H&S Manager in relation to this ESMP will include:</p> <ul style="list-style-type: none"> H&S inputs to the CESMP. Overall responsibility for H&S compliance in line with the CESMP. Obtaining and updating, if required, all H&S licences, approvals and permits as necessary. Identifying the need for and commissioning H&S specialists, if required. Organising and maintaining briefing session records and mitigation and monitoring documentation. Ensuring that Incidents and Accidents Register and Non-conformance and Corrective Action Register have been completed and tracking completion of corrective actions identified. Reviewing, developing, and implementing CESMP improvements, as required or as a result of non-conformance.
Environmental and Social (E&S) Manager	<p>Specific duties of the E&S Manager in relation to this ESMP will include:</p> <ul style="list-style-type: none"> Developing the CESMP. Overall responsibility for compliance with the CESMP. Obtaining and updating, if required, all environmental licences, approvals and permits as necessary. Identifying the need for and commissioning environmental and social specialists, if required (e.g., Ecological Clerk of Works, Heritage Specialist, Noise specialist, etc.). Ensuring standard checklists, records and documents are completed and maintained to support the CESMP. Organising and maintaining briefing session records and mitigation and monitoring documentation. Ensuring that Incidents and Accidents Register and Non-conformance and Corrective Action Register have been completed and tracking completion of corrective actions identified. Reviewing, developing, and implementing Construction ESMP improvements, as required or as a result of non-conformance.
Community Liaison Officer (CLO)	<p>Specific duties of the CLO in relation to this ESMP will include:</p> <ul style="list-style-type: none"> Preparation and implementation of the Construction SEP. Receiving and respond to any complaints from external parties. Ensuring that the relevant engagement has been taken place in accordance with the SEP. Reporting any H&S issues raised by stakeholders to the H&S Manager. Reporting any E&S issues raised by stakeholders to the E&S Manager. Maintaining a register of Community Grievances.

Role	Overview of Responsibilities
	<ul style="list-style-type: none"> Ensuring that community grievances are addressed by the relevant personnel and ensuring grievances not related to the project or the construction activities are responded to. Reporting on stakeholder engagement and grievances to the E&S Manager.
Ecological Clerk of Works	A trained Ecologist will be retained during construction to lead and implement any pre-construction surveys, method statements and the ecological monitoring programme, and report progress and results to the CESMP/HSE Manager.
Cultural Heritage Specialist	<p>A qualified Cultural Heritage Specialist should be retained by the Contractor for the duration of excavation works to provide oversight of the protection of cultural heritage sites, provide toolbox talks to the Contractor staff, and oversee the Chance Finds Procedure, and remain on-call on an as-needed-basis. Their responsibilities include, in the case of a Chance Find:</p> <ul style="list-style-type: none"> Undertake consultation with relevant key stakeholders. Provide and follow the procedures for the documentation and assessment of Chance Finds to determine if additional investigations are required. Follow the protocols for consultation with the national regulatory bodies to design and implement additional investigations (if required). Undertake record keeping and chain of custody for movable finds. Follow expert verification procedures. Produce Chance Find reports for issue to the Contractor HSE Manager.
Noise Specialist	<p>A trained Noise specialist will be retained during construction on an “as needs” basis. The responsibilities of the Noise Specialist include:</p> <ul style="list-style-type: none"> Lead and implement noise monitoring, if required, and report progress and results to the Contractor E&S Manager.
Air Quality Specialist	<p>A trained Air quality specialist will be retained during construction on an “as needs” basis. The responsibilities of the Air Quality Specialist include:</p> <ul style="list-style-type: none"> Lead and implement air quality monitoring, if required, and report progress and results to the Contractor E&S Manager.
Contractor Project Employees	<p>Duties of all employees in relation to this ESMP will include:</p> <ul style="list-style-type: none"> Accepting individual responsibility for their own safe behaviour. Compliance with all CESMP instructions given and for working in a safe manner at all times. Attendance at all Toolbox Talks, site induction and other safety and HSE meetings and training as requested. Identifying and correcting the unsafe acts of themselves, others, and conditions within their area of responsibility. Promptly report any incidents or accidents immediately or as soon as practicable if reasonable steps can be adopted to control the incident. Stop activities where there is an actual or potential risk of harm to the environment and advise the relevant person.

4 Delivery Mechanism

4.1 Project Documentation

4.1.1 The PIU will be required to develop a Project ESMS (see Section 5). As part of this, the PIU will prepare the following Project-specific policy documents that contractors will be required to comply with:

- Environmental and Social policy
- Human resources policy and procedure (covering labour and working conditions and community health and safety and gender)
- Contractor/Supplier Chain policy
- Code of Conduct
- Discrimination and Harassment Policy
- Labour Management policy (covering temporary workers' accommodation and gender-based violence and harassment (GBVH)).

4.1.2 The PIU will also prepare the following Project-specific plans that contractors will be required to comply with:

- Updated Project ESMP
- Overarching Project Labour Management Plan
- Supply Chain Management Plan
- Code of Conduct
- Project Gender Equality and GBVH Action Plan
- Overarching Project Stakeholder Engagement Plan

4.1.3 Further details on the content of the ESMS and its supporting policies and plans are provided in Section 7 of this ESMP.

4.1.4 The PIU will incorporate ESAP, ESIA and ESMP mitigation, management and monitoring measures and permit requirements into contractual arrangements with the Construction Contractor. They will also 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.

4.2 Construction Environmental and Social Management Plan (CESMP)

4.2.1 The Construction Contractor will be required to comply with all relevant Mongolian legislation and related standards (see **Appendix D**) as well as the measures set forth in the Project ESMS and its supporting documentation, including the aforementioned policies and plans. Construction Contractor

staff and any sub-contractor staff will be required to read and sign the Project Code of Conduct.

4.2.2 Construction Contractor will be required to prepare a detailed CESMP prior to the start of the construction phase, to be approved by the MoE/PIU. This will be a requirement in the tender specification for the Construction Contractor.

4.2.3 The CESMP will include, but not be limited to:

- Introduction, background, objective and structure of document;
- The Project's environmental and social and health and safety policies and goals;
- The Project's environmental, social, health and safety (ESHS) regulatory framework and safeguards;
- Environmental and social management roles and responsibilities;
- Register of environmental and social impacts, mitigation measures and commitments;
- Issue-specific environmental and social management plans (see below);
- Environmental and social management procedures;
- Institutional arrangements and implementation;
- Training and awareness;
- Inspections and audits;
- Non-conformance and Accident/Incident procedures;
- Resourcing and budget allocation;
- Implementation schedule; and
- Management review and reporting requirements.

4.2.4 The CESMP will contain several sub-plans including, not necessarily limited to:

- Construction Risk Register;
- Air Quality Management Plan;
- Noise and Vibration Management Plan;
- Traffic Management Plan;
- Water, Wastewater and Drainage Management Plan;
- Biodiversity Management Plan, including Invasive Species Management Plan;
- Materials Use and Waste Management Plan;
- Soil Storage and Site Reinstatement Plan;
- Pollution Prevention Plan;
- Spill Prevention and Response Plan;
- Cultural Heritage Management Plan and Chance Finds Procedure;
- Labour Management Plan;
- Local Employment and Procurement Plan;
- Supply Chain Management Plan;

- Occupational Health and Safety (OHS) Plan;
- Community Health, Safety and Security Management Plan;
- Influx Management Plan;
- Workers' Camp Management Plan;
- Emergency Preparedness and Response Plan;
- Training Plan;
- Security Plan; and
- Community and Labour Grievance Mechanism.

4.2.5 An outline Labour Management Plan is provided in **Appendix E**.

4.2.6 Prior to construction on site, a number of additional surveys and measures will be required principally to address the final routing, individual tower locations and potential economic and physical displacement.

4.2.7 During construction, amendments may be required to the CESMP and its associated plans if any major changes occur to the Project's design, performance, environmental and social conditions or resulting from incidents or accidents. The process of CESMP Change Management will be the responsibility of the Construction Contractor and reviewed by the MoE/PIU.

4.2.8 Post-construction/pre-handover, the Construction Contractor will also be responsible for delivering any post-construction measures to the approval of the MoE/PIU. A Soil Storage and Site Reinstatement Plan will be prepared for the post-construction phase, prior to site handover, for adequate and effective rehabilitation of construction compounds, workers' camp and all other land disturbed during construction.

4.2.9 The supervision and monitoring of the implementation of the CESMP and the associated sub-plans will be conducted by the MoE/PIU.

4.3 Operation and Maintenance Environmental and Social Management Plan (O&M ESMP)

4.3.1 At least three months prior to the operation phase, the Operation and Maintenance (O&M) ESMP shall be finalised by the NPTG in collaboration with MoE/PIU (O&M ESMP). Where relevant, this will be integrated into existing NPTG management plans. The O&M ESMP will be implemented by the NPTG, and all O&M contractors will be expected to follow the O&M ESMP.

4.3.2 The O&M ESMP should cover the following:

- Emergency Preparedness and Response Plan;
- Gender Equality and GBVH Action Plan;
- Labour Grievance Procedure and Register;
- OHS Management Plan;

- Operational Waste Management Plan; and
- Labour Management Plan.

4.3.3 Where appropriate, these requirements can be integrated into existing plans the NOG has.

4.4 Stakeholder Management Plan

4.4.1 A SEP has been prepared as part of the ESIA. The SEP is a living document, so will be updated throughout the construction and operational phases of the Project. During construction, the MoE/PIU will manage the overall implementation of the stakeholder engagement process, including development of a Project SEP to provide an overarching approach to engagement consistent across all contractors and sub-contractors.

4.4.2 The Construction Contractor will develop a Construction SEP (CSEP) that aligns with the Project SEP, for implementation prior to and during construction.

4.4.3 During operation, the Project SEP will be the responsibility of the NPTG.

4.5 Land Acquisition and Resettlement Framework

4.5.1 A LARF has been prepared as part of the ESIA. The MoE is responsible for the preparation of a RAP and/or LRP in accordance with the LARF, should this be required based on the final route. However, given no further detailed design is proposed, the MoE/PIU will need to engage with land owners and users and work with the Construction Contractor to confirm the final route and tower locations.

4.5.2 The Construction Contractor will be responsible for ensuring that they have identified and secured all temporary land requirements (e.g. construction camps) and that where these will result in temporary or permanent physical and/or economic displacement, the sites are secured in accordance with the LARF. Where required, the Construction Contractor will need to prepare a RAP and/or LRP, in liaison with and for approval by the MoE/PIU.

5 Environmental and Social Management System (ESMS)

- 5.1.1 The MoE/PIU shall prepare an overarching ESMS for this Project. The ESMS will be submitted to the EBRD for approval. The ESMS will provide a set of policies, procedures, tools and management plans to identify and manage environmental and social risks. In its basic terms, an ESMS comprises the following documents:
- Policies and procedures;
 - ESIA;
 - ESMP;
 - SEP;
 - Change Management Procedure for route changes;
 - LARF and, if requirement, RAP and/or LRP;
 - Legislation, regulatory and permit register;
 - Commitments register;
 - Organisational capacity and commitment;
 - Supply chain management; and
 - Monitoring and reporting.
- 5.1.2 Key Environmental and Social covenants will be set out in the tender documents, during the Construction Contractor selection process, for inclusion in the Contractor ESMS. The Construction Contractor will be responsible for implementing an ESMS that is in line with International Standards, Lender requirements (including the ESIA Disclosure Documents), and the MoE's ESMS.
- 5.1.3 The Construction Contractor will be required to appoint appropriately qualified specialists with the following expertise, to ensure the ESMS is implemented to the required standards:
- Environmental;
 - Health and safety;
 - Social and GBVH; and
 - Land acquisition, resettlement and livelihoods, as applicable.
- 5.1.4 The Construction Contractor must conduct an initial safety induction course for construction workers regarding: health and safety measures; and emergency response in case of accidents, fire, earthquakes, landslides, flash flooding, environmental and community interactions, etc. The Construction must also develop and implement a safety and security training programme and conduct safety meetings on a monthly basis.
- 5.1.5 The ESMS will also provide the framework for the development of O&M management plans by the NPTG in collaboration with the MoE/PIU, or its integration into existing systems held by NPTG as appropriate.

6 Environmental and Social Impacts and Risks

6.1 Construction Phase

- 6.1.1 A summary of environmental and social impacts and risks during the construction phase as identified in the ESIA is provided in **Table 6-1**.
- 6.1.2 A summary of environmental and social impacts during the operation phase as identified in the ESIA is provided in **Table 6-2**.

Table 6-1 Summary of Environmental and Social Impacts during the Construction Phase

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
Material Use and Waste Management		
Earthworks and foundations Construction activities (erection of structures) Trackout (vehicle movement) Topsoil storage piles Gaseous and GHG emissions from construction machinery Construction compounds and lay down areas Temporary workers' camp	Construction workers Third-party waste facilities Herder households Flora and fauna (including livestock) Surface water bodies and ground water Soils	Depletion of material resources, including sand and water Accumulation of volumes of excavated materials, construction wastes, municipal solid waste Potential environmental pollution with hazardous waste such as used oil, empty drums or replaced parts of the construction machinery
Air Quality		
Earthworks and foundations Construction activities (erection of structures) Trackout (vehicle movement) Topsoil storage piles Gaseous and GHG emissions from construction machinery Construction compounds and lay down areas Temporary workers' camp	Herder camps Flora and fauna, including livestock	Dust pollution (Particulate Matter, PM) Air pollution with gaseous emissions (CO, NO _x and SO ₂) and potential exceedance of standards

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
Noise and Vibration		
Earthworks and foundations Construction activities (erection of structures) Construction vehicle and plant use Construction compounds and lay down areas Temporary workers' camp	Herder camps Flora and fauna, including livestock	Noise and vibration disturbance and exceedance of standards
Biodiversity, Flora and Fauna		
Earthworks and foundations Construction vehicle and plant use Erection of towers Construction compounds and lay down areas, with some artificial lighting Vegetation clearance Permanent and temporary land take Presence of construction staff Temporary workers' camp	Designated locally protected areas: <ul style="list-style-type: none"> • Zoogiin Kholoi Local Protection Area (LPA) • Uushiin Govi LPA • Ganzaga Uuliin Urgutgul LPA Habitats and flora <ul style="list-style-type: none"> • Habitats, including those of higher importance - Ephemeral pond, Dry riverbed with elm trees, Dry riverbed with almond shrubs and the Marshy area near Sainshand. • Rare and endangered flora Fauna <ul style="list-style-type: none"> • Large mammal assemblage • Small mammal assemblage • Bats • Birds of Conservation Concern 	Habitat and flora destruction and degradation Animal mortality through vegetation clearance and vehicle collisions Visual and noise disturbance to animals in the area Pollution events Human pressures including: <ul style="list-style-type: none"> • Poaching by construction staff • Littering by construction staff (including food waste) • Gathering of rare plants • Introduction of invasive species • Increased risk of wildfires

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
	<ul style="list-style-type: none"> Reptiles Invertebrates 	
Cultural Heritage		
<p>All earthworks, including land clearance, surface levelling and construction works</p> <p>Construction compounds and lay down areas</p> <p>Movement of equipment and construction vehicles</p> <p>Construction workforce</p> <p>Temporary workers' camp</p>	<p>None currently identified within the route and its 25m RoW. There are 8 registered sites in the wider Project Area: Khiimoriin Ovoo, Tumen Ulzii Ovoo, The stone monuments of Khoshootiin Khooloi, The Khavtsgain Am rock carvings, The Khongil Tsav paleontological site, Temeetiin toirom burials site, Olon Khuree Monastery ruins site and Khamar Monastery ruins site. There are a further 14 sites identified through stakeholder engagement though not registered in Mongolia.</p>	<p>Partial or total removal of unknown buried cultural heritage receptor</p> <p>Damage to an unknown cultural heritage receptor from construction related vibration</p> <p>Burial of an unknown receptor under spoil created by construction</p>
Landscape and Visual		
<p>Earthworks and foundations</p> <p>Construction vehicle and plant use</p> <p>Erection of towers and poles and stringing of overhead lines</p> <p>Material stockpiles</p> <p>Access roads, with signage</p> <p>Construction compounds and lay down areas, with some artificial lighting</p> <p>Vegetation clearance</p> <p>Permanent and temporary land take</p> <p>Presence of construction staff</p>	<p>Landscape character</p> <ul style="list-style-type: none"> Relative remoteness and tranquillity of the semi-desert steppe landscape Openness and vastness of the landscape Long panoramic views along open valleys Areas of occasional seasonal wetland and watercourse Locations of local cultural and social significance <p>Visual receptors</p> <ul style="list-style-type: none"> The community of Sainshand Visitors to recreational, social and cultural sites 	<p>Disturbance of local landscape character</p> <p>Reduction in visual amenity for sensitive receptors</p>

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
Temporary workers' camp with some artificial lighting	<ul style="list-style-type: none"> Visitors to Khan bayanzurkh mountain in Han Bayan Zurh Uul LPA 	
Soils		
Soil stripping for compound and access route footprints Earthworks including tower foundations Stockpiling Use of machinery and construction vehicles Use and storage of oils and chemicals Presence of temporary workers' camp (if required)	Soils (and land) supporting agriculture and natural habitats	Erosion Deterioration Compaction Contamination
Natural Hazards		
Heavy snow or rain Hail, lightning and thunder Spring snowmelt and flash floods, soil thawing Strong winds, dust storms, snowstorms and fog Ice storms Cold	Construction staff Construction equipment Local herder households Local roads and railways crossed by the OHTL	Loss of working hours Reduction in visibility Damage to access roads Restriction of machinery movement Injury and death Increased energy consumption Loss of power
Water Environment		
Land clearing	Dry riverbeds	Increased surface runoff generated in response to rainfall

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
Earthworks Erection of towers and poles Construction of in-channel structures, if needed	Human drinking water wells Wetland	Changes the hydromorphology of rivers Changes in overland flow paths Pollution of surface and groundwater resources Increased local water demand
Social and Community		
Construction works and demand for workers and products Influx of construction workers Movement of construction-related vehicles and equipment Use of power, water and local services e.g. health services Poor ethical conduct	Local communities Herders within 1km of the OTHL route Social and other infrastructure e.g. hospitals, water utilities, railway, etc. Women and vulnerable people/groups	Decreased health and wellbeing from increased dust, noise and nuisance Influx of construction workers can result in friction with the local community, affecting community cohesion Conflict with local communities, in particular women and young girls Risk of contracting HIV/AIDs or other Sexually Transmitted Diseases (STDs) as well as communicable disease e.g., coronavirus Injury to herders or nearby members of the public Demand for electricity, water and health facilities affecting availability for local communities Differential impacts on vulnerable people
Economy, Employment and Livelihoods		
Construction employment, with salaries likely to be comparable to sector averages Construction employee expenditure on transport, assets, hard goods and consumables	Project affected communities and businesses Herders	Positive impact on the regional and local economy Employment opportunities for local people Opportunity to up-skill, both through obligatory induction training and through more applied short courses

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
Direct demand by the Contractor for project materials, provisions and services.	Owners of land and infrastructure crossed by the Project route (mine licence areas, land allocated for development, railways, roads) Construction workers Women and vulnerable people/groups	Increase expenditure in the local economy by both construction workers and the Contractor Local inflationary pressures and increased living costs if supplies of labour, goods and services cannot be met
Land Use, Tenure and Displacement		
Temporary land take (e.g., access roads, construction compound and construction workers' accommodation camp)	Project affected communities Herders Local businesses, including owners and users of land and infrastructure crossed (mine licence areas, land allocated for development, railways, roads) Women and vulnerable people/groups	Temporary disruption to existing land uses for access Disruption to herders' livelihoods (e.g., dust emission) Temporary depletion of water available to herders through abstraction
Labour and Working Conditions		
Construction workforce in a country with a high level of child labour and forced labour at national level Poor OHS on construction sites, lack of monitoring and management Lack of consideration of social and labour aspects in management of supply chain High risk of GBVH incidents in construction activities Poor ethical conduct Construction workers' accommodation camp	Project affected communities Construction workers Migrant workers Third party suppliers Women and vulnerable people/groups	Unsuitable workers' accommodation camp (e.g., unsanitary, insufficient facilities, too small) Risk of exploitative working practices, labour grievances, supply chain issues, occupational health and safety concerns, and child and forced or compulsory labour Potential discrimination against workers due to lack of implementation of HR policy and procedures Limited employment opportunities for women Risk of injury from construction traffic and site works

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
		<p>OHS hazards including electrocution, working at height and handling heavy equipment</p> <p>Reduced safety and security for women employed on the Project and potential GBVH risks</p>
Climate Resilience		
<p>Extreme heat</p> <p>Extreme cold</p> <p>Wind</p> <p>Storms</p> <p>Rainfall and flooding</p> <p>Dust storms</p> <p>Wildfire</p>	<p>Construction equipment</p> <p>Construction workers</p> <p>Temporary structures</p> <p>Road network and access</p>	<p>Damage to equipment due to natural hazards e.g., overheating, flooding and high winds</p> <p>Reduced efficiency due to uncomfortable working conditions e.g., extreme heat or cold</p> <p>Health impacts due to extreme conditions e.g., heat stroke and frostbite</p> <p>Health impacts due to natural hazards e.g., floods, high winds and dust storms</p> <p>Damage to temporary structures due to natural hazards e.g., windblown debris, flooding and wildfires</p>

Table 6-2 Summary of Environmental and Social Impacts during the Operation and Maintenance Phase

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
Waste Management		
O&M activities, mainly at the substations	O&M workers Third-party waste facilities Herder households along the OHTL route Flora and fauna (including livestock) Surface water bodies and ground water Soils	Accumulation of volumes of excavated materials, construction wastes, municipal solid waste Potential environmental pollution with hazardous waste such as used oil, empty drums or replaced parts of the O&M machinery
Air Quality		
n/a	n/a	n/a
Noise and Vibration		
Additional transformers at Tsagaan Suvarga substation	Herder camps Workers at Tsagaan Suvarga mine	Noise and vibration disturbance and exceedance of standards
Biodiversity, Flora and Fauna		
Routine maintenance activities including vehicle movements Vegetation clearance Vandalism, theft and acts of terrorism Presence of OHTL and associated infrastructure	Designated locally protected areas: <ul style="list-style-type: none"> • Zoogiin Kholoi LPA • Uushiin Govi LPA • Ganzaga Uuliin Urgutgul LPA Habitats and flora	Habitat and flora destruction and degradation through maintenance tracks Bird and bat casualties from collisions with overhead power lines Animal mortality during maintenance activities through vehicle collisions and removal of bird nests from power lines

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
	<ul style="list-style-type: none"> Habitats, including those of higher importance - Ephemeral pond, Dry riverbed with elm trees, Dry riverbed with almond shrubs and the Marshy area near Sainshand. Rare and endangered flora <p>Fauna</p> <ul style="list-style-type: none"> Large mammal assemblage Small mammal assemblage Bats Birds of Conservation Concern Reptiles Invertebrates 	<p>Fragmentation of habitats through creation of a dispersal barrier.</p> <p>Visual and noise disturbance of animals during maintenance activities.</p> <p>Pollution events during maintenance activities.</p> <p>Changes to hydrology through creation of permanent structures</p> <p>Human pressures:</p> <ul style="list-style-type: none"> Poaching by road construction staff. Gathering of rare plants. Introduction of invasive species. Littering by road construction staff (including food waste). Increased risk of wildfires.
Cultural Heritage		
n/a	n/a	n/a
Landscape and Visual		
<p>690 OHTL towers</p> <p>Periodic refurbishment of towers and overhead lines</p>	<p>Landscape character</p> <p>Relative remoteness and tranquillity of the semi-desert steppe landscape</p> <ul style="list-style-type: none"> Openness and vastness of the landscape Long panoramic views along open valleys Areas of occasional seasonal wetland and watercourse 	<p>Disturbance of local landscape character</p> <p>Reduction in visual amenity for sensitive receptors</p>

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
	<ul style="list-style-type: none"> Locations of local cultural and social significance Visual receptors <ul style="list-style-type: none"> The community of Sainshand Visitors to recreational, social and cultural sites Visitors to Khan bayanzurkh mountain in Han Bayan Zurh Uul LPA 	
Soils		
n/a	n/a	n/a
Natural Hazards		
Heavy snow or rain Hail, lightning and thunder Spring snowmelt and flash floods, soil thawing Strong winds, dust storms, snowstorms and fog Ice storms Cold	Project infrastructure O&M staff Local communities and herders	Loss of working hours Reduction in visibility Damage to roads and Project infrastructure Restriction of machinery movement Injury and death Increased energy consumption Loss of power
Water Environment		
OHTL towers located in or nearby dry riverbeds/watercourses	Dry riverbeds Herder households / downstream settlements Human drinking water wells	Change in hydrological regime of watercourses near to towers following a flood Pollution from O&M activities

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
	Wetland	Introduction of pollution pathways to surface watercourses and groundwater
Social and Community		
<p>Movement of maintenance-related vehicles and equipment</p> <p>Use of local services. e.g. health services / hospitals and infrastructure (railways, roads, etc) crossed by the POHTL</p> <p>Poor ethical conduct</p> <p>Improved CES reliability</p>	<p>Project affected communities</p> <p>Herde households</p> <p>Social and other infrastructure</p> <p>Customers of the Central Energy System (CES)</p> <p>Women and vulnerable people/groups</p>	<p>Health and wellbeing impacts from EMFs</p> <p>Health and wellbeing impacts to the general public including electrocutions, fires and tower collapses</p> <p>GBVH and sexual exploitation, abuse and harassment (SEAH) due to construction workers remaining</p> <p>Demand for water and health facilities affecting use by local communities</p> <p>Improved reliability and stability of the CES having a positive impact on wellbeing</p>
Economy, Employment and Livelihoods		
<p>Improved CES reliability</p> <p>O&M employment</p>	<p>Project affected communities and businesses</p> <p>Herder households</p> <p>Owners of land and infrastructure crossed by the Project route (mine licence areas, railways, roads)</p> <p>Customers of the Central Energy System</p> <p>Construction workers</p> <p>Women and vulnerable people/groups</p>	<p>Limited employment opportunities compared to construction phase</p> <p>Positive impact on local and regional economy due to improved reliability and stability of the CES</p> <p>Energy capacity to support regional development</p> <p>Upskilled workers (who can take these skills to a new project)</p> <p>Positive impact livelihoods due to improved reliability and stability of the CES</p>

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
Land Use, Tenure and Displacement		
Permanent land take (OHTL route and its 25m RoW)	<p>Herders</p> <p>Local businesses, including owners and users of land and infrastructure crossed (mine licence areas, land allocated for development, railways, roads)</p> <p>Women and vulnerable people / groups</p>	Permanent impact to land use within the RoW (e.g., mining and other allocated developments)
Labour and Working Conditions		
<p>Poor OHS on O&M sites, lack of monitoring and management</p> <p>Lack of consideration of social and labour aspects in management of supply chain</p> <p>Poor ethical conduct</p> <p>Occupational exposure to EMFs</p>	<p>Project affected communities</p> <p>O&M</p> <p>Third party suppliers</p> <p>Women and vulnerable people/groups</p>	<p>Risk of exploitative working practices, labour grievances, supply chain issues, occupational health and safety concerns, and child and forced or compulsory labour</p> <p>OHS hazards including electrocution, working at height and handling heavy equipment</p> <p>Health impacts from Electro-magnetic fields (EMFs)</p> <p>Reduced safety and security for women employed on the Project and potential GBVH risks</p>
Climate Resilience		
<p>Extreme heat</p> <p>Extreme cold</p> <p>Wind</p> <p>Storms</p> <p>Rainfall and flooding</p> <p>Dust storms</p>	<p>Buildings and OHTL infrastructure</p> <p>Landscape receptors</p> <p>Access routes</p> <p>O&M workers</p>	<p>Damage to buildings and OHTL infrastructure due to natural hazards e.g., snowfall, flooding and high winds</p> <p>Reduced O&M worker efficiency due to uncomfortable working conditions e.g., extreme heat or cold</p> <p>Health impacts due to extreme conditions e.g., heat stroke and frostbite</p>

Construction Activity / Sources of Impact	Potentially Sensitive Receptor	Potential Impacts
Wildfire		<p>Health impacts due to natural hazards e.g., floods, high winds and dust storms</p> <p>Reduced transmission due to natural hazards and extreme conditions</p> <p>Die-back of vegetation due to prolonged extreme temperatures</p> <p>Blocking of access routes e.g., due to windblown debris</p>

7 Environment and Social Management Measures

7.1.1 The aim of this ESMP is to identify the:

- Mitigation measures and monitoring requirements that should be implemented to address the impacts on environmental and social receptors and resources arising from the Proposed Project;
- Source of commitment, i.e. ESIA;
- Regulation if available, i.e. Mongolia National Standards (MNS) or Mongolian laws;
- Responsible party / parties for planning and implementing the mitigation measures and monitoring requirements;
- Management planning route for the mitigation measures and monitoring requirements.
- Verification method/compliance monitoring; and
- Reporting format.

7.1.2 This environmental and social measures are set out for each stage of the Project, i.e. pre-construction, construction, post-construction/pre-handover, and operation and maintenance phases in the following tables.

Table 7-1 Pre-Construction Environmental and Social Mitigation and Control Measures

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Detailed ESMS and ESMP						
<p>Assessment (GEIA) and submit for approval by the Ministry of Environment and Climate Change. Following approval of the GEIA:</p> <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. 	GEIA	Law on EIA	MoE/EBRD/Loal consultant	n/a	Approval of GEIA. Public consultation held. Approval of DEIA.	Reports
A PIU will be set up in the MoE to support the MoE. PIU staff will be fully competent in environmental, social and Occupational health and safety (OHS) performance management.	ESIA		MoE	ESMS	Appointment of PIU staff	Organogram
<p>The PIU will ensure that the Project construction tendering process includes 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 Project ESAP will be simplified in terms of the requirements to be implemented by the Construction Contractor. Construction Contractor requirements contained within the ESAP will be included in their contracts.</p> <p>Review of Contractor's detailed CESMP, CSEP, policies and practices upon selection and appointment.</p> <p>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.</p> <p>Consideration of poor environmental and social performance penalty mechanisms.</p>	ESIA	Labour Code	PIU	ESMS	Contract clauses	Contract documents

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
The PIU will liaise with and train any Project Supervision Consultant or Engineer Supervisor role, to facilitate monitoring of implementation of mitigation measures during the construction stage. There should be co-ordination for resolving complicated issues that arise in the field and to provide continuously updated information to submit reports to the PIU and the EBRD.	ESIA		PIU	ESMS	Training programme	Training records Inspection records
<p>Preparation of detailed Project ESMS.</p> <p>The Project ESMS will include:</p> <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 Change management procedure that triggers additional or new E&S assessment for changes to project components such as route and location changes Project SEP Project LARF MoE and NPTG roles and responsibilities including those of the PIU and the Supervision Engineer Project schedule/programme to monitor and manage future activities. <p>A detailed summary will also be prepared of all environmental and social (E&S) mitigation measures including from ESIA into Commitments Register, segregating Company versus Contractor responsibility for each commitment.</p>	ESIA, ESAP, ESMP	<p>Good international practice.</p> <p>ISO 14001.</p> <p>ISO 45001.</p>	MoE/PIU	ESMS	Availability of Project ESMS and Commitments Register	Inspection records
<p>Develop Project policies and Code of Conduct within 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) Discrimination and harassment policy Contractor/Supplier policy Labour management policy, covering temporary workers' accommodation and GBVH. 	ESIA, ESAP, ESMP	<p>Labour Code</p> <p>ILO standards</p> <p>EBRD PR2</p>	MoE/PIU	ESMS, ESMP	Availability of Project policies, Tender Documentation	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> Code of Conduct <p>Requirements in relation to following the Project ESMS will be include in the tendering documentation for the Construction Contractor.</p>						
<p>The Human Resources Policy will be in line with national legislation, applicable International Labour Organisation (ILO) standards and recommendations and EBRD PR2.</p> <p>The human resource policy will set out its approach to managing employees, including rights under Mongolian labour and employment law, and employee rights to join worker organisations and bargain collectively. It should include procedures for avoiding gender bias in recruitment and gender-based violence and harassment in the workplace.</p> <p>It will also have clear statement that there will be no use of forced labour or employ children in a manner that is exploitative or likely to interfere with their education or be harmful to their development, this is also to apply to sub-contractors / supply chain.</p>	ESIA, ESAP, ESMP	Labour Code ILO standards EBRD PR2	MoE/PIU	ESMS	Availability of policy	Inspection records
<p>Prepare Project-specific plans that contractors will be required to comply with:</p> <ul style="list-style-type: none"> Updated Project ESMP Overarching Project Labour Management Plan Supply Chain Management Plan Code of Conduct Project Gender Equality and GBVH Action Plan Overarching Project Stakeholder Engagement Plan 	ESIA, ESAP, ESMP	EBRD PR2	MoE/PIU	ESMS	Availability of plans Tender Documentation	Inspection records
<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, ecological and health and safety 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>	ESIA		MoE/PIU	ESMS	Any new or additional E&S assessments submitted to EBRD for no objection with explanation of material change that triggered such assessment. Final design provided to EBRD for review and no objection approval.	E&S screening and associated reports Final design report

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>Adoption of Project ESMS and preparation of detailed CESMP. This should cover as a minimum:</p> <ul style="list-style-type: none"> Construction Risk Register; Air Quality Management Plan; Noise and Vibration Management Plan; Traffic Management Plan; Water, Wastewater and Drainage Management Plan; Biodiversity Management Plan, including Invasive Species Management Plan; Materials Use and Waste Management Plan; Soil Storage and Site Reinstatement Plan; Pollution Prevention Plan; Spill Prevention and Response Plan; Cultural Heritage Management Plan and Chance Finds Procedure; Labour Management Plan; Local Employment and Procurement Plan; Supply Chain Management Plan; Occupational Health and Safety (OHS) Plan; Community Health, Safety and Security Management Plan; Influx Management Plan; Workers' Camp Management Plan; Emergency Preparedness and Response Plan; Training Plan; Security Plan; and Community and Labour Grievance Mechanism. <p>The ESMP/each plan should cover:</p> <ul style="list-style-type: none"> Roles and responsibilities General measures to be employed Site specific measures to be employed Inspection and monitoring requirements, including tools Inspections, audits and reporting Non-conformance and Accident/Incident procedures 	ESIA, ESAP, ESMP	Labour Code	Construction Contractor	CESMP	<p>Adoption of Project ESMS and availability of Construction ESMP</p> <p>Signed Code of Conduct by all contractor staff and sub-contractor staff</p>	Inspection records
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	ESIA	Labour Code Applicable ILO standards	MoE/PIU	ESMS	<p>Availability of HR policy and Procedure</p> <p>Availability of Overarching Project Labour Management Plan</p>	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>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) • 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. 					Targets and KPIs set and agreed with Construction Contractor	

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<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 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>						
<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. 	ESIA	Labour Code Applicable ILO standards	MoE/PIU	ESMS	Availability of Project supply chain policy and Project Supply Chain Management Plan	Inspection records

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=a1aHR0cHM6Ly93d3cuZWJyZC5jb20vZG93bmxxYWRzL2Fib3V0L3N1c3RhaW5hYmIsaXR5L05vbKRpc2NyaW1pbmF0aW9uLnBkZg&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=a1aHR0cHM6Ly93d3cuZWJyZC5jb20vZG93bmxxYWRzL2Fib3V0L3N1c3RhaW5hYmIsaXR5L05vbKRpc2NyaW1pbmF0aW9uLnBkZg&ntb=1)

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

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<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; 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. 						
<p>Undertake a GBVH and gender risk assessment.</p> <p>Develop a stand-alone Gender Equality and GBVH Action Plan. 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</p>	ESIA, ESAP, ESMP	EBRD PR2	MoE/PIU	ESMS	<p>Availability of risk assessment</p> <p>Gender Equality and GBVH Action Plan</p> <p>Project KPIs set</p> <p>GBVH training provided</p>	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>project employees, suppliers and contractors on GBVH associated risks.</p> <p>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.</p> <p>Provide training to project employees, suppliers and Contractors on GBVH and SEAH associated risks.</p> <p>Promote open discussions about GBVH and SEAH concerns through disclosure of gender awareness materials.</p> <p>Provide training and implementation of effective Project and employee grievance mechanisms.</p> <p>Monitoring of implementation by PIU and Construction Contractor and their supply chain.</p> <p>Gender disaggregated data will be maintained on staff and contractors.</p>					Monitoring of grievance mechanism for GBVH related incidents	
<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>	ESIA, ESAP, ESMP	EBRD PR2	MoE/PIU	ESMS	Adoption of formal labour grievance mechanism for employees in PIU.	Grievance records
Permits						
<p>Overarching Legal and Permit register to be developed and provided to the Construction Contractor. Legal and Permit register to include as a minimum:</p> <ul style="list-style-type: none"> Water permit - well drilling permissions from the local soum authorities and water use permission from the basin administration. 	ESIA, ESAP		MoE/PIU	ESMS	Permit Register	Legal and Permit Register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> Access - access road permissions from relevant authority (aimag and soum governors). Waste - permission for waste disposal from relevant authority Waste - ensure that contractors transporting waste have relevant approvals by the authorities. 						
Permit register to be updated for implementation. All necessary permits to be in place prior to the start of permitted activities (e.g. construction camps).	ESIA, ESAP		Construction Contractor	ESMS	Permit obtained Evidence of compliance with permits (e.g. reports/audits)	Permit documentation with validity
Stakeholder engagement						
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 be made aware of the disclosure via local soum and bagh officials.	ESIA		EBRD and their consultants	ESIA Disclosure Package	Public Consultation Summary Report available	Inspection reports
Development of Project SEP to provide an overarching approach to stakeholder engagement, including during construction and operation. A Community Liaison Officer will be appointed.	SEP, ESAP		MoE/PIU	Project SEP	Availability of Project SEP, Grievance Mechanism and Grievance Register Appointment of Community liaison officer or equivalent	Project SEP Grievance mechanism
The PIU will set up and maintain a Project-specific Community Grievance Mechanism on the MoE website and that will be managed by the PIU.	ESIA, SEP, ESAP		MoE/PIU	Project SEP	Project-specific community grievance mechanism in place	Inspection records
Ensure early notice to local communities, businesses and herder households prior to major project activities that could affect them.	SEP, ESAP		MoE/PIU	Project SEP	Notices displayed	Engagement register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
						Minutes of meetings
<p>Prepare and implement a Construction Stakeholder Engagement Plan (CSEP) that aligns with the Project SEP, for approval by PIU. This will include a Stakeholder programme for engaging with the local community and herder households in camps within 1km of proposed works.</p> <p>A Community Liaison Officer will be appointed, who will consult regularly with local communities, in accordance with the plan, and raise awareness within the affected communities on any health, safety and security concerns. Advance warning of the works will be provided.</p> <p>As part of this Plan, a programme for engagement with infrastructure and utility owners will also be prepared and implemented.</p> <p>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>Report on CSEP activities to the MoE/PIU.</p>	SEP, ESAP		Construction Contractor	CSEP	<p>Appointment of Community liaison officer or equivalent</p> <p>Availability of Construction SEP, Community Grievance Mechanism and Grievance Register</p> <p>Monthly, quarterly and annual reports on stakeholder engagement and grievances.</p> <p>Updated CSEP, as relevant, following 6-monthly reviews</p>	<p>Engagement register</p> <p>Minutes of meetings</p>
<p>Undertake public education/awareness raising sessions prior to construction and once a year thereafter as a minimum or following an incident, at bagh level and herder households/herders grazing in the Project Area e.g. to encourage herders not to leave small livestock unattended during the construction period).</p>	SEP, ESAP		Construction Contractor	CSEP	<p>Meetings held and recorded</p> <p>Number of grievances recorded</p>	<p>Construction SEP</p> <p>Grievance mechanism</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Cultural heritage						
<p>Commission a specialist Mongolian organisation to undertake archaeological and paleontological surveys (and potentially also an ethnographical study, where they are considered 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 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.</p> <p>The specialised consultants should also prepare a Chance Finds Procedure.</p>	ESIA	<p>Law on Protection of Cultural Heritage, 2014, as amended</p> <p>Law on Land, 2002, as amended</p>	MoE/PIU	Cultural Heritage Management Plan and Chance Finds Procedure	<p>Availability of final design maps</p> <p>Cultural Heritage Management Plan and Chance Finds Procedure</p> <p>Mitigation measure incorporated into CESMP</p>	<p>Cultural Heritage Management and Chance Finds Procedure Plan</p> <p>Updated CESMP</p>
Biodiversity, flora and fauna						
<p>The OHTL deviates from the rail line for approximately 22km, taking the route through habitat of good condition and within 100m of the ephemeral pond discussed previously within this report. It is recommended these good condition habitats (which also form part of Uushiin Govi LPA) are avoided. This can be achieved through adjusting the OHTL to continue following the rail line and the severely degraded habitats associated with it, until a crossing of the rail line is required. The alternative route does not result in additional turning points. As well as avoiding good condition habitat and flora, this adjustment avoids the ephemeral pond which was also highlighted for its potential to support high numbers of birds (when wet) within the collision</p>	ESIA	<p>Law on Environmental Protection (1995, amended 2012)</p> <p>Law on Fauna (2000, amended 2012)</p> <p>Law on Natural Plants (1995, amended 2015)</p>	MoE/PIU/Construction Contractor	EIA/ESIA	Availability of final design maps	Updated project design

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
risk assessment. Therefore, collision risk associated with this feature will be avoided. See Appendix F.						
For any micro-siting, towers should be positioned where the lowest impact on habitats and Rare / Endangered Flora will occur within the limits of deviation available. The elm trees which support nesting Cinereous Vulture should be retained.	ESIA	Law on Environmental Protection (1995, amended 2012) Law on Fauna (2000, amended 2012) Law on Natural Plants (1995, amended 2015)	MoE/PIU/Construction Contractor	EIA/ESIA	Availability of final design maps	Updated project design
Water						
The towers will not be located near a nearby watercourse or have the ability to reroute flows to other areas.	ESIA	Law on Environmental Protection (1995, amended 2012)	MoE/PIU/Construction Contractor	ESIA	Availability of final design maps	Updated project design
Climate						
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 	ESIA		MoE/PIU/Construction Contractor	ESIA	Availability of final design maps and Bill of Quantities	Updated project design

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>fences to trap wind-blown sand 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. 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. 						
Permanent land acquisition						
Ensure all permanent land requirements are secured in accordance with national legislation and agreed with the relevant land owners/users. This includes with the herder households grazing in the area, mining licence holders, those owning or holding certificates for the lands allocated for development, soums, the land required within the Blast explosives storage site and agreements for use along any easements e.g., with national or private roads or railways.	LARF, ESAP	Law on Land, 2002, as amended	MoE/PIU	LARF	Agreement in place with land owners/users Possession Certificate in accordance with the Law on Land	Written / signed agreements Legal documentation
Ensure no construction of new camps within the RoW prior to construction, via liaison at the soum and bagh level and discussion with herder households and regular checks of the route.	LARF, ESAP	Law on Land, 2002, as amended	MoE/PIU	LARF	Register of meetings	Survey record
<p>Undertake a survey prior to works of the final confirmed route, including any micro-siting of towers. This will require input from the Construction Contractor, if no further detailed design is proposed.</p> <p>The final siting of towers should be selected based on minimal E&S impacts and avoiding, or if this is not possible, minimising,</p>	ESIA, LARF, ESAP	Law on Land, 2002, as amended	MoE/PIU/Construction Contractor	LARF ESMP	Updated ESMP Design documents	E&S screening and associated assessment reports Survey record

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>involuntary economic or physical displacement, in line with the requirements set out in the ESIA and the LARF.</p> <p>Where necessary, additional mitigation measures will be applied to reduce adverse E&S impacts.</p>						
<p>If required, following pre-construction surveys, RAP and/or LRP, in accordance with EBRD PR5. This will include measures such as:</p> <ul style="list-style-type: none"> Engagement with the local government and herders including confirmation of a cut off date Where necessary, access will be maintained to allow for the safe passage of livestock between grazing areas Compensate legal landowners and users (including any individuals with customary land rights) at full replacement cost for any loss of land and non-land assets Provide livelihood restoration measures and assistance for any loss of livelihood and compensate for loss of income associated with economic displacement Reach a 'negotiated settlement' with affected landowners and users on livelihood restoration and compensation measures Compensate and restore livelihood of informal businesses which have been affected directly and indirectly Provide transitional support to economically displaced persons Undertake monitoring of the land acquisition and livelihood restoration process to ensure the Project affected individuals' livelihoods are restored to a pre-Project levels 	LARF, ESAP	Law on Land, 2002, as amended	MoE/PIU	LARF	RAP/LRP, which covers LARF requirements	RAP/LRP / document evidence
Temporary land acquisition						
Construction Contractor to identify all temporary site requirements. Construction Contractor will be required to select temporary site requirements on the basis of minimal environmental and social impacts, and assess final sites chosen so that, where necessary, additional mitigation measures can be applied to reduce adverse impacts. E&S screening	ESIA	Law on Land, 2002, as amended	Construction Contractor	Site Construction Management Plan	E&S Screening reports for sites, assessment reports, submitted to EBRD and PIU for no objection approval.	E&S screening report Inspection reports

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>(Appendix B) should be completed. No temporary land take for construction camps, temporary laydown areas, etc is to be undertaken in within 1km of herder households (see Appendix A and following survey of proposed sites) or in the areas identified as having ecological value (see Appendix G). 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.</p> <p>Land entry and land exit procedures/protocols will be developed to facilitate land/site hand-over at the end of construction.</p>					<p>Maps with worker camp locations (include camp lay out, welfare facilities, and first aid kit locations), access roads, construction lay down areas including location of fuel storage areas.</p> <p>Land entry and land exit procedures/protocols to facilitate land/site hand-over at the end of construction.</p>	
The Construction Contractor should acquire temporary land in a manner that avoids any involuntary economic and physical displacement. Where involuntary displacement is not possible, a RAP and/or LRP must be prepared and implemented in accordance with the LARF.	LARF, ESAP	Law on Land, 2002, as amended	Construction Contractor	LARF	RAP/LRP, which covers LARF requirements	RAP/LRP / document evidence
Worker camps will be established in accordance with EBRD/IFC guidance: Workers' accommodation: processes and standards ³ . Plan to be prepared for approval by PIU a Workers' Accommodation Camp Management Plan prior to construction.	ESIA, ESAP		Construction Contractor	ESMP	<p>Availability of Workers' Accommodation Camp Management Plan that covers EBRD requirements, approved by PIU.</p> <p>Details of</p> <ul style="list-style-type: none"> a) sewage treatment system for camp sanitation, b) fire fighting equipment c) first aid equipment d) code of conduct for staff, 	Inspection reports

³ EBRD/IFC (August 2009), Workers' accommodation: processes and standards. A guidance note by IFC and EBRD. Available at: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_workersaccommodation



Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
					e) accommodation facilities - separate sleeping areas and toilets for male and female workers f) health facilities	

Table 7-2 Construction Phase Environmental and Social Mitigation and Control Measures

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
ESIA / ESMP						
A Soil Storage and Reinstatement Plan will be prepared which will cover the actions required for the post-construction phase, prior to site handover, for adequate and effective rehabilitation of construction compounds, workers' camp and all other land disturbed during construction.	ESIA, ESMP	Law on Environmental Protection 1995, amended 2012	Construction contractor	Soil Storage and Reinstatement Plan	Availability of Soil Storage and Reinstatement Plan	Pre- and post-construction inspection reports and photos
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, construction workers' accommodation camp(s), etc.).	ESIA, ESMP		Construction contractor	Legal and Permit Register	Permits and approvals in place and valid Monitoring reports	Permits and approvals Inspection
A pre-construction survey will be undertaken by the Construction Contractor to capture video/photo description of any sensitive receptors within a 1km distance from the proposed OHTL as well as any other working areas to be used by the Construction Contractor. The purpose of this baseline will be both to (i) verify any changes in the baseline in relation to the baseline set out in this ESIA and to confirm whether additional mitigation measures are required and (ii) to provide a baseline in relation to the construction works, to demonstrate that no additional damage was caused during the construction works so that sites can be "made good" following construction.	ESIA, ESMP		Construction Contractor	CESMP	Adoption of Project ESMS and availability of Construction ESMP.	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Air Quality						
<p>Comply with Mongolian dust emission standard (MNS 4585: 2007). Monitoring measures:</p> <ul style="list-style-type: none"> Undertake daily visual inspections where receptors (including roads) are nearby, to monitor dust, record inspection results Carry out regular site inspections to monitor compliance with the schedule of mitigation measures Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken Maintain a log of dust-based complaints Record any exceptional incidents that cause dust and/or air emissions, either on- or off-site, and the action taken to resolve the situation in the log book 	ESIA	<p>Law on Environmental Protection 1995, amended 2012</p> <p>Law on Air 1995, amended 2012</p> <p>National Air Quality Standards MNS 4585:2016 Air quality. General technical requirements</p> <p>National Air Quality Standards MNS 6063:2010 Acceptable concentration of pollutant elements for atmospheric air in public area.</p>	Construction contractor	Air Quality Management Plan	<p>Continuous control</p> <p>Daily visual inspection</p> <p>Availability of Construction SEP</p> <p>Number of grievances</p>	<p>Monitoring/inspection records</p> <p>Consultation records</p> <p>Grievance Register</p>
<p>Preparing and maintaining site measures:</p> <ul style="list-style-type: none"> Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible Erect solid screens or barriers around dusty activities or the site boundary so that are at least as high as any stockpiles on site if the construction activity is prolonged and there are receptors nearby Remove materials that have a potential to produce dust from site as soon as possible, unless being re- 	ESIA	As above	Construction contractor	Air Quality Management Plan	<p>Continuous control</p> <p>Visual inspections</p>	Monitoring/inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>used on site. If they are being re-used on-site, cover as described below</p> <ul style="list-style-type: none"> Cover, seed or fence stockpiles to prevent wind whipping Parked construction vehicles and equipment will not be located in proximity to sensitive receptors (e.g. near herder camps). PPE will be provided to workers exposed to dust. Soil stripping during windy periods will be prohibited where this does not constrain the construction programme; or water dousing will be employed. 						
<p>Operating vehicle/machinery and sustainable travel measures:</p> <ul style="list-style-type: none"> Enforce speed limits for all construction vehicles of no more than 20 km/h. Use construction plant and transport vehicles with higher efficiency ratings. Regular inspection and maintenance of machinery and equipment. Vehicles and machinery that meets the emission standard only shall be allowed to operate. Ensure all vehicles switch off engines when stationary - no idling vehicles. 	ESIA	As above	Construction contractor	Air Quality Management Plan	<p>Continuous control</p> <p>Visual inspections</p>	Monitoring/inspection records
<p>Operations measures:</p> <ul style="list-style-type: none"> Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate Use enclosed chutes and covered waste or materials containers Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling 	ESIA	As above	Construction contractor	Air Quality Management Plan	<p>Availability of environmental awareness and site procedures</p> <p>Continuous control</p> <p>Visual inspections</p>	Monitoring/inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>equipment and use fine water sprays on such equipment wherever appropriate</p> <ul style="list-style-type: none"> Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods. Rehabilitate disturbed areas as soon as practicable. 						
<p>Waste management measures:</p> <ul style="list-style-type: none"> Avoid bonfires and burning of waste materials. 	ESIA	As above	Construction contractor	Air Quality Management Plan	Continuous control Visual inspections	Monitoring/inspection records
<p>Construction measures:</p> <ul style="list-style-type: none"> Avoid scabbling (roughening of concrete surfaces) if possible Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place 		As above	Construction contractor	Air Quality Management Plan	Continuous control Visual inspections	Monitoring/inspection records
<p>Trackout measures:</p> <ul style="list-style-type: none"> Construction vehicles will strictly follow approved deviation routes to avoid creating multiple earth tracks. Erect visible signs informing site road traffic of permissible routes. Inspect access routes for integrity, instigate necessary repairs and record in site logbook. All project staff including drivers to be inducted for environmental awareness and site procedures, for example vehicle speed, use of designated roads. Avoid dry sweeping of large areas Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport 	ESIA	As above	Construction contractor	Air Quality Management Plan	Availability of environmental awareness and site procedures Training records Continuous control Visual inspections	Monitoring/inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> A separation distance of 1km is maintained between gers/camps and construction related vehicles and non-road mobile machinery (NRMM) 						
Noise and Vibration						
<p>Construction machinery and equipment specified, used and purchase should produce noise and vibration within the permissible levels of relevant standards; or be equipped with noise reduction devices where necessary to ensure noise emission levels of vehicles and machineries comply to national standards.</p> <p>Avoid unnecessary revving of engines and switch off equipment when not required.</p> <p>Start-up plant and vehicles sequentially rather than all together.</p>	ESIA	<p>Law on Environmental Protection 1995, amended 2012</p> <p>Law on Air 1995, amended 2012</p> <p>MNS 4585:2016: Air Quality. General Technical Requirements</p> <p>MNS 5003:2000. General Requirements for the Measurements of Noise</p> <p>MNS 5002:2000. Occupational Safety and Health. Noise. Requirements for General Safety.</p>	Construction contractor	Noise and Vibration Management Plan	<p>Review of the technical specifications of the machinery and equipment</p> <p>Continuous control</p> <p>Number of grievances</p>	<p>Construction works schedule</p> <p>Monitoring/inspection records</p> <p>Grievance register</p>
Regular inspection of vehicle noise emission and timely maintenance to prevent noise emissions from increasing due to poor maintenance. Ensure through preventive inspections and planned maintenance that construction plant are maintained in good condition with regards to minimising environmental noise and vibration as well as	ESIA	As above	Construction contractor	Noise and Vibration Management Plan	<p>Continuous control</p> <p>Number of grievances</p>	<p>Monitoring/inspection records</p> <p>Grievance register</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
workers exposure to harmful noise and vibration. Noise-generating devices should be maintained in good operating condition with regular maintenance.						
Conduct regular noise monitoring at active construction sites to consider the noise generation against the appropriate local standards.	ESIA	As above	Construction contractor	Noise and Vibration Management Plan	Monthly monitoring Number of grievances	Monitoring/inspection records Grievance register
Communication will be undertaken with the local herder households along the route to notify in advance of activities with the potential to generate higher levels of noise and/or vibration and the measures implemented to control noise and/or vibration. A dedicated grievance mechanism will be in place to allow local residents to contact the site easily relating to concerns.	ESIA	As above	Construction contractor	Noise and Vibration Management Plan	Review of the technical specifications of the machinery and equipment Monthly monitoring Number of grievances	Monitoring/inspection records Grievance register
Construction operational hours will be used as a primary methodology for the control of significant noise effects, limiting construction activities to daytime periods only defined as: Monday to Friday 07:00 – 19:00. Maximum speed limit for all construction vehicles is 20 km/h.	ESIA	As above	Construction contractor	Noise and Vibration Management Plan	Monthly monitoring Number of grievances	Monitoring/inspection records Grievance register
Ensure the workers' accommodation camps are located at least 1 km from Noise Sensitive Receptors, such as herder camps.	ESIA	As above	Construction contractor	Noise and Vibration Management Plan Construction Workers' Accommodation Camp Management Plan	Number of grievances	Monitoring/inspection records Grievance register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Biodiversity, Flora and Fauna						
Habitat & Flora Mitigation Measures: <ul style="list-style-type: none"> Use of low-impact construction methods and vehicles, for example, plant / machinery with spread load to preserve surrounding vegetation and prevent ground compaction. Sensitively locate site construction compounds / lay-down areas and access routes to avoid undisturbed habitat and flora wherever possible. This could include utilising existing tracks across the landscape. Implementation of a Soil Management Plan designed to reduce adverse impacts through erosion, deterioration, compaction and contamination. Soil reinstatement should be applied to any habitats degraded by construction works (working areas, compounds / lay-down area and temporary access routes). The existing habitats have a large percentage of bare ground (a typical feature of habitats in this area), therefore rather than re-seeding, it is anticipated that if the soil reinstatement is followed, the habitat will re-establish naturally (as shown along existing OHTLs). While working in the marshy area and dry riverbeds (where groundwater could be close to the surface), follow the mitigation measures outlined within the Water, Wastewater and Drainage Management Plan. This includes details of maintaining natural drainage patterns. Designated refuelling stations should be established with suitable ground protection and spill kits on site. Contamination mitigation measures are also presented in the Soil Management Plan. 	ESIA	Law on Environmental Protection (1995, amended 2012) Law on Fauna (2000, amended 2012) Law on Natural Plants (1995, amended 2015)	Construction Contractor	Construction Biodiversity Management Plan Soil Management Plan Water, Wastewater and Drainage Management Plan Air Quality Management Plan	Availability of the relevant plans.	Inspection records.

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> No-works buffer zones (of approximately 2m) around known plants – see Appendix G. Where impact to Rare and Endangered plants is unavoidable, translocation of plants should be completed by competent and experienced professionals. Ensure no herbicides are used. Fire prevention and management controls should be enforced, including segregated and monitored smoking and cooking zones with appropriate disposal facilities for cigarettes and lighting equipment, and maintenance of plant with increased security and surveillance. Appropriate disposal facilities should also be provided and include segregation, secure storage, and timely disposal of waste. This should be monitored and remedial litter picking conducted as required. 						
<p>Brief construction workers on likely presence and identification of Rare and Endangered flora to ensure any additional locations of these plants which haven't been found in this study, can be identified and protected.</p> <p>Brief construction workers on likely presence of fauna (particularly large mammals) and what procedures to take if they are found.</p> <p>Zero-tolerance policy for littering should be made clear and a waste management programme should be exercised.</p> <p>A strict ban on poaching should be enforced. This should be made clear during construction worker onboarding procedures. A site manager should be assigned the task of enforcing and monitoring this ban.</p>	ESIA	As above	Construction Contractor	Construction Biodiversity Management Plan	<p>Availability of the Construction Biodiversity Management Plan</p> <p>Toolbox talks</p>	Inspection records



Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Monitor unauthorized activities, such as gathering of plants, and enforce strict penalties for violations. Educate construction workers and ensure strict enforcement of policies against unauthorized gathering of rare plants.	ESIA	As above	Construction Contractor	Construction Biodiversity Management Plan	Availability of the Construction Biodiversity Management Plan Toolbox talks	Inspection records
Mammal Mitigation Measures <ul style="list-style-type: none"> Prior to any vegetation clearance or excavation, the area will be walked to flush mammals (and other fauna such as reptiles and invertebrates) out of the clearance area. The clearance will then be completed in a systematic way (i.e. working from one side to the other), to allow further movement of animals away from the area of works Excavations should avoid any animal burrows noted in the area. Low speed limits for vehicles should be enforced to reduce the probability of animal collisions. No nighttime working is proposed, and so artificial light to allow such works will not be required. If this changes, an appropriate method of works will need to be put in place to ensure light spill does not disturb surrounding mammals. This is likely to include directional lighting of low lux levels, as well as a strategy for nighttime driving. Mammals are likely to move away from a working area naturally, utilising other areas of the landscape as an alternative. However, to reduce noise and vibration impacts, the mitigation recommendations set out in the Noise and Vibration Management Plan should be followed. If on approaching an area of works at the start of the working day, large mammals are found to be using a water source to drink, the construction activities should be suspended until these animals naturally move off. Similarly, if large mammals start to approach working areas to access a nearby 	ESIA	As above	Construction Contractor	Construction Biodiversity Management Plan Noise and Vibration Management Plan	Availability of the Construction Biodiversity Management Plan Toolbox talks	ECOW reports

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
water source, construction activities should be suspended until these animals naturally disperse to at least 350m. This approach is especially important at Uushiin Govi and Ganzaga Uuliin Urgutgul LPA where the main distribution of Red Listed large mammals were found during survey work (Uushiin Govi LPA is also designated as it supports populations of these species).						
Bird Mitigation Measures <ul style="list-style-type: none"> The elm trees which support nesting Cinereous Vulture should be retained. Clearance of low vegetation should ideally avoid the bird breeding season (March to August inclusive). If this is not possible, the area of vegetation clearance should be walked prior to clearance to check for bird nests. If an active nest is found (being built / attended by adult / contains eggs or young), then a no-works buffer zone of at least 20m around the nest should be applied until all chicks have fledged the nest. This buffer should be clearly marked out. Vegetation removal outside a 20m buffer of an active nest can continue, however the vegetation and nest can only be removed once the bird has finished the nesting cycle. Construction activities with high levels of noise (excavation and erection of towers) should ideally be avoided within a 500m buffer of any raptor nest (particularly species of conservation concern, of which Cinereous Vulture was recorded nesting) while the nest is active. A nest site of this species is located outside this 500m buffer, however any new nests or additional High value raptor species noted should have the 500m buffer applied. Appropriate demarcation and signage should be applied around this buffer. Once nesting is complete, works can continue within the buffer area. If it is essential to carry out work within this 500m buffer during construction works, then a suitably qualified and experienced ecologist should be 	ESIA	As above	Construction Contractor	Construction Biodiversity Management Plan Noise and Vibration Management Plan	Availability of the Construction Biodiversity Management Plan Toolbox talks	ECOW reports

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>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.</p> <ul style="list-style-type: none"> The mitigation recommendations set out in the Noise and Vibration Management Plan should be followed to further reduce noise and vibration impacts to nesting birds. 						
Cultural Heritage						
<p>Organise training among construction workers and supervisors to raise awareness on cultural heritage and implementation of the Chance Finds Procedure.</p> <p>Establish Code of Conduct prohibiting worker interaction with cultural heritage.</p>	ESIA	Law on Protection of Cultural Heritage, 2014 as amended	PIU/Construction Contractor/Specialised contractor who completes the surveys for MoE	<p>Training Plan</p> <p>Cultural Heritage Management Plan</p> <p>Code of Conduct</p>	<p>Availability of cultural heritage awareness training program, and training records</p> <p>Check that Cultural Heritage Chance Finds Procedure is in place</p> <p>Records of any Chance Finds, and steps taken following the find.</p>	<p>Cultural heritage awareness training records</p> <p>Inspection report</p> <p>Grievance register</p>
<p>Good construction practices should be put in place to ensure that the compounds and other works are sited away from identified cultural heritage features, including any features identified during the MoE commissioned surveys. List of current features is provided in Appendix H.</p>	ESIA	As above	Construction Contractor	Cultural Heritage Management Plan	<p>Availability of E&S screening report</p> <p>Availability and content of Cultural Heritage Management Plan, and maps of the construction sites</p> <p>Availability of the Workers' Accommodation Camp Management Plan</p>	<p>Inspection report</p> <p>Grievance register</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>A chance finds procedure should be in place during construction and during any intrusive works.</p> <p>Any chance finds discovered will be managed in accordance with the Chance Finds Procedure.</p> <p>If chance finds occur construction works shall be stopped immediately, and the project administration shall notify the soum, district Governor, the police and the relevant authorities; and hire professionals to identify the finding.</p> <p>The Construction Contractor will inform local communities of any chance finds via local bagh meetings between the contractor and bagh leaders. Additional mitigation measures may be required to be implemented if the chance finds are associated with a local community member, in liaison with the affected party.</p>	ESIA	As above	Construction Contractor	Chance finds register	Availability of Cultural Heritage Chance Finds Procedure, and chance finds register/reports (if applicable)	Chance finds register
Landscape and Visual						
The most intense parts of the construction activity that occurs near to areas of identified cultural and social value (i.e. Khiimoriin ovoo and the adjacent part of the Ulaan Tolgoi valley that is used for horseraces and parts of the annual naadam sports festival) should avoid the times of year that they are most visited/considered important.	ESIA	Law on Special Protected Areas, 1994, as amended	Construction Contractor	CESMP	Construction programme	Construction programme Grievance register
For any re-routing of elements, particularly visually incongruous elements of the construction should be considerably placed so that they cover the minimum area required and are located away from the areas used by sensitive receptors (i.e. Khiimoriin ovoo and	ESIA	Law on Special Protected Areas, 1994, as amended	Construction Contractor	CESMP	E&S screening	Inspection report Grievance register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
residential areas in Sainshand). aligning with other linear infrastructure were possible.						
Use of lighting should be limited to the minimum quantity and illumination necessary to ensure safety to minimise light spillage, sky glow and to minimise glare to surrounding sensitive receptors	ESIA		Construction Contractor	CESMP	CESMP	Inspection report Grievance register
Where appropriate disturbed land should be re-contoured to original formations	ESIA		Construction Contractor	CESMP Post-construction Restoration Report	Inspection of the construction site pre- and post-construction	Inspection report
Soils						
Planning measures: <ul style="list-style-type: none"> Preparation of a Soil Storage and Site Reinstatement Plan before the construction work commencement Training to Site Manager or delegated agent from Soil Scientist 	ESIA, ESMP	Law of Soil Protection and Prevention from Desertification Law on land Environmental Protection Law	Construction Contractor	Soil Management Plan	Availability of Soil Storage and Site Reinstatement Plan Training held Weekly inspection	Inspection report Training records
Soil compaction prevention measures: <ul style="list-style-type: none"> Prevent construction vehicles driving on unauthorised/ unplanned areas. Erect signs on deviation and access roads to ensure that heavy duty trucks strictly follow approved deviation tracks to avoid creating multiple earth trucks. 	ESIA, ESMP	As above	Construction Contractor	Soil Management Plan	Availability of Soil Storage and Site Reinstatement Plan Weekly inspection	Inspection report
Site preparation measures: <ul style="list-style-type: none"> Construction sites should be properly organised. This will reduce the area of soil potentially degraded. Vegetation clearance from topsoil 	ESIA, ESMP	As above	Construction Contractor	Soil Management Plan	Availability of Soil Storage and Site Reinstatement Plan Inspection of the construction site before the start of	Inspection report

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> layout of access routes, compounds and stockpile areas 					construction works, and regularly thereafter	
Soil stripping measures: <ul style="list-style-type: none"> Soils to be stripped according to the thickness of soil horizons and soil types as per the ESIA and with minimum mixing of horizons No soil stripping during rain or wet ground conditions Minimisation of dust and silt-laden runoff generation 	ESIA, ESMP	As above	Construction Contractor	Soil Management Plan	Availability of Soil Storage and Site Reinstatement Plan Weekly inspection	Inspection report
Soil stockpiling measures: <ul style="list-style-type: none"> Stockpiles to be located in appropriate locations to avoid increased flood risk, watercourses and topographic depressions Soils to be stockpiled in designated stockpile area according to temporary work design Topsoil and subsoil materials to be stockpiled separately and clearly labelled as per the ESIA 	ESIA, ESMP	As above	Construction Contractor	Soil Management Plan	Availability of Soil Storage and Site Reinstatement Plan Weekly inspection	Inspection report
Soil stockpile maintenance measures: <ul style="list-style-type: none"> The time for which soils are stockpiled should be minimised Where practicable, stockpiles are to be seeded with low maintenance grass mix to minimise risk of soil erosion and dust spread over adjacent grazing grass 	ESIA, ESMP	As above	Construction Contractor	Soil Management Plan	Availability of Soil Storage and Site Reinstatement Plan Weekly inspection	Inspection report
Soil reconditioning measures: <ul style="list-style-type: none"> Where required, soils should be reconditioned before reinstatement and reuse so they are in a suitable condition for the intended re-use 	ESIA, ESMP	As above	Construction Contractor	Soil Management Plan	Availability of Soil Storage and Site Reinstatement Plan Weekly inspection	Inspection report
Soil contamination measures:	ESIA, ESMP	Petroleum product supply technology and operating	Construction Contractor	Soil Management Plan	Availability of Soil Storage and Site Reinstatement Plan	Inspection report



Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> Develop and implement detailed Spill Prevention and Response Plan for the management of all chemicals, fuels and oils used during the Project. Erect signs on access roads to ensure that heavy vehicles strictly follow approved deviation tracks to avoid creating multiple tracks Create designated collection points for domestic and hazardous waste. Construction materials and domestic wastes should be disposed of at approved places Maintenance of machinery and equipment used in tower construction shall be conducted in a designated area where the work does not adversely impact the soil and the environment Oil storage and distribution activities shall adhere to the relevant domestic standards such as "Petroleum product supply technology and operating procedures MNS 4633: 2006" and "General technical requirements for Petrol Station and equipment MNS 4633: 2006". Spill kits shall be kept in accessible locations at all times during construction, and on-site environmental and safety staff shall be trained with oil spill neutralization skills and their use and disposal. Use of sawdust, sand, cloth or special synthetic absorbent material (TSSW50W) to avoid spreading of soil contamination in the event of an oil spill event. Maintenance of machinery and equipment used in road construction shall be conducted in a designated area where the conditions are not adverse to the soil and the environment. Strict procedures will be followed when refuelling to minimise the risk of spills to the environment. 		<p>procedures MNS 4633: 2006</p> <p>General technical requirements for Petrol Station and equipment MNS 4633: 2006</p>		Spill Prevention and Response Plan	<p>and Spill Prevention and Response Plan</p> <p>Availability of safe working procedure for refuelling activities</p> <p>Continuous control</p> <p>Weekly inspection</p>	

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Soil reinstatement measures: <ul style="list-style-type: none"> Soils from temporary land take should be reinstated to previous conditions after the completion of construction. 	ESIA, ESMP	As above	Construction Contractor	Soil Management Plan	Availability of Soil Storage and Site Reinstatement Plan Inspection of the construction site pre- and post-construction	Inspection report
Soil reuse <ul style="list-style-type: none"> Surplus topsoil should be reused to maximise its value and potential such as landscaping. 	ESIA, ESMP	As above	Construction Contractor	Soil Management Plan Post-construction Restoration Report	Availability of Soil Storage and Site Reinstatement Plan Inspection of the construction site pre- and post-construction	Inspection report
Waste						
Prepare and implement a detailed Materials Use and Waste Management Plan. The waste hierarchy shall be applied in project planning to ensure efficient use and management of resources so that priority is to prevent generation of waste at source (i.e.: smart purchase approach by estimating the amount correctly and efficient use of materials so that no surplus material that might end up as a waste) and facilitate waste recovery wherever possible. Disposal of domestic and construction waste without a permit shall be prohibited.	ESMP	Law on Waste	Construction Contractor	Materials and Waste Management Plan	Availability of Materials Use and Waste Management Plan Waste hierarchy included in the Plan Valid permits in place	Inspection records Evidence/records
Procedures for handling, storage, transportation and transfer of waste will be implemented. Designated collection points will be created for, including temporary sites for collection and storage of, domestic and hazardous waste. Construction materials and domestic wastes should be disposed to at approved places.	ESMP	Law on Soil Protection and Prevention from Desertification Law on Waste	Construction contractor	Materials and Waste Management Plan	Availability of Materials and Waste Management Plan and procedures for handling, storage, transportation and transfer of waste Weekly inspections of bulk materials and waste points	Inspection records Waste transfer notes



Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
All bulk materials used and wastes generated during the construction activities that have the potential to pollute will be stored within appropriate storage facilities, that are banded and provided with secondary containment).						
Food waste shall be disposed to designated collection points, with enclosed containers and protected with fencing in order to prevent animal poisoning.	ESMP	Law on Waste	Construction Contractor	Materials and Waste Management Plan	Weekly visual inspections of the waste collection and storage areas, including food waste collection points	Inspection results
Burning of waste shall be prohibited.	ESMP		Construction Contractor	Materials and Waste Management Plan Training Plan	Continuous control Weekly inspections of waste collection points - evidence of waste burning (if it took place) Waste training program/ environmental awareness program in place	Inspection records Waste management/ environmental awareness training records
Pre-determine types and amount of hazardous, non-hazardous and inert waste to be generated as much as possible to enable the effective planning of management actions prior to construction (i.e.: define location and volume of waste disposal sites, storage, transportation and disposal of hazardous waste, and waste disposal methods etc)	ESMP	Law on Waste	Construction Contractor	Materials and Waste Management Plan	Check the availability and the content of the Materials Use and Waste Management Plan	Inspection records
Provide project employees with training on waste management to improve knowledge and awareness on reducing waste generation, waste types and their classification, and project waste management rules.	ESMP	Law on Waste	Construction Contractor	Materials and Waste Management Plan Training Plan	Check that waste training program/environmental awareness program is in place and training records	Waste management/ environmental awareness training records
Provide all vehicles/drivers with waste collection bags to prevent any unauthorized waste disposal.	ESMP	Law on Waste	Construction Contractor	Materials and Waste Management Plan	Weekly visual inspections of vehicles	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Equip construction areas with containers for the collection of domestic and construction waste and spent fuel and lubricants. Each designated waste storage area will be equipped with waste skips, containers or bins for temporary storage before recycling, treatment or disposal off-site.	ESMP	Law on Waste	Construction Contractor	Materials and Waste Management Plan	Weekly visual inspections of storage areas of domestic and construction waste and spent fuel and lubricants.	Inspection records
Waste storage containers will be: <ul style="list-style-type: none"> a. clearly labelled – to describe the contents using the appropriate waste labels which shall be completed b. old labels shall be removed to avoid confusion c. appropriate to the waste they contain d. appropriately sealed (e.g. with a lid or cover) e. not emitting any harmful gases or generating heat 	ESMP	Law on Waste	Construction Contractor	Materials and Waste Management Plan	Availability of Materials Use and Waste Management Plan Weekly inspections of waste storage containers	Inspection records
For spills, once the sand absorbs oil, it shall be disposed at designated waste disposal area. Before removing contaminated soils, take special containers or plastic bags to avoid pollution.	ESMP	Law on Waste	Construction Contractor	Spill Prevention and Response Plan	Availability of the Spill Prevention and Response Plan, waste permitting documentation in relation to disposal of sand contaminated by oil Waste permitting documentation/ licenses	Inspection records
Hazardous waste transportation will comply with the relevant legislation.	ESMP	Regulation on Classification, Collection, Packing, Temporary Placement, Transport, Safety, and Completion of	Construction Contractor	Materials Use and Waste Management Plan	Availability of Materials Use and Waste Management Plan Check that the companies responsible for hazardous waste transportation have required licenses	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
		Hazardous Wastes (2012) Law on Waste				
Waste will be stored in a manner that: prevents a contact between incompatible wastes, and allows for inspection between containers to monitor leaks or spills.	ESMP	Law on Waste	Construction Contractor	Materials Use and Waste Management Plan	Availability of Materials and Waste Management Plan Weekly inspections of hazardous waste storage areas	Inspection records
Hazardous waste will be stored in closed containers away from direct sunlight, wind and rain.	ESMP	Law on Waste	Construction Contractor	Materials and Waste Management Plan	Availability of Materials and Waste Management Plan Weekly inspections of hazardous waste storage areas	Inspection records
Secondary containment systems will be constructed with materials appropriate for the wastes being contained and adequate to prevent loss to the environment. Secondary containment is included wherever liquid wastes are stored in volumes greater than 220 litres. The available volume of secondary containment will be at least 110% of the total storage capacity, or 25% of the total storage capacity.	ESMP	Law on Waste	Construction Contractor	Materials and Waste Management Plan	Availability of Materials and Waste Management Plan Visual inspection of the secondary containment systems	Inspection records
Readily available information on chemical hazards to employees will be provided, including labelling each container to identify its contents.	ESMP	Law on Waste	Construction Contractor	Materials and Waste Management Plan	Weekly inspections of the chemicals and hazardous waste storage areas to check the availability of the information on chemical hazards and labelling	Inspection records



Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
The hazardous waste storage area will be clearly identified and demarcated, including on a facility map or site plan. Access to hazardous waste storage areas will be limited to employees who have received proper training.	ESMP	Law on Waste	Construction Contractor	Materials and Waste Management Plan Training Plan	Availability of Materials Use and Waste Management Plan and site map Weekly inspections of the hazardous waste storage areas Review of the hazardous waste handling training records	Hazardous waste handling training records Inspection records
Periodic inspections of hazardous waste storage areas will be conducted; inspection findings will be documented.	ESMP	Law on Waste	Construction Contractor		Weekly inspections of the hazardous waste storage areas	Inspection schedule and records
Spill response and emergency plans will be prepared to address accidental releases. Storage areas will be provided with fire extinguishers, spill kits according to the type and quantity of stored hazardous waste.	ESMP	Law on Waste	Construction Contractor	Spill Prevention and Response Plan Emergency Preparedness and Response Plan	Availability of the spill response and emergency plans	Accident and emergency records
Hazardous waste will be transported from the construction site to appropriately licenced/permited facilities for treatment, recycling, re-use or disposal. Waste containers will be secured and labelled with the contents and associated hazards, be properly loaded on the transport vehicles and be accompanied by a shipping paper with the description of the load and its associated hazards.	ESMP	Law on Waste	Construction Contractor	Materials and Waste Management Plan	Availability of waste licenses/permitting documentation Review of hazardous waste loading process as necessary	Inspection records Shipping paper

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Natural Hazards						
The risk assessment undertaken by the Construction Contractor will include consideration of natural hazards.	ESIA, ESMP		Construction Contractor	Risk register	Availability of risk assessment and Risk register	Inspection records Accident and emergency records
The Construction Contractor shall develop, implement and maintain an Emergency Preparedness and Response Plan.	ESIA, ESMP	<p>MNS 6522:2015. Overhead transmission lines for 35-750kV. General requirements for construction.</p> <p>Technological Work Card for Measuring Grounding Resistance of Overhead Transmission Lines and Substations under Annex 3 to Ministerial Order No. A/194 of 2022 issued by the Minister of Energy.</p> <p>Regulations on the Installation of Electrical Engineering Facilities under Annex 2 to Ministerial Order No. 5 of 2014 issued by</p>	Construction Contractor	Emergency Preparedness and Response Plan	Availability of Emergency Preparedness and Response Plan	Inspection records Accident and emergency records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
		the Minister of Energy.				
The Construction Contractor shall monitor weather forecasts prior to undertaking work and reschedule works where possible.	ESIA, ESMP	As above	Construction Contractor	CESMP Emergency Preparedness and Response Plan	Availability of CESMP and Emergency Preparedness and Response Plan Construction programme	Inspection records Accident and emergency records
Construction staff will be provisioned with appropriate PPE to mitigate risks of overheating, including lightweight, breathable, and moisture-wicking fabrics. UV exposure should be limited through UV-protected clothing, shading, and sun screen, and sufficient potable water should be provided to prevent risks associated with dehydration.	ESIA, ESMP	As above	Construction Contractor	CESMP Emergency Preparedness and Response Plan	Availability of CESMP and Emergency Preparedness and Response Plan	Inspection records
Health and safety training will be delivered to all construction staff prior to beginning work, and should include information on the signs of heat exhaustion and related health impacts; natural hazards; and fire prevention and suppression, including information on how to avoid health and safety impacts should a wildfire occur.	ESIA, ESMP	As above	Construction Contractor	CESMP Emergency Preparedness and Response Plan	Availability of CESMP and Emergency Preparedness and Response Plan	Accident and emergency records
Flammable materials should be stored away from areas frequently used by workers to reduce risk of fire spread. Any flammable vegetation or materials should be removed from these areas and provide fire suppression equipment to staff.	ESIA, ESMP	As above	Construction Contractor	CESMP Emergency Preparedness and Response Plan	Availability of CESMP and Emergency Preparedness and Response Plan	Inspection records Accident and emergency records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Water Environment						
<p>Flood risk measures:</p> <ul style="list-style-type: none"> A detailed Water, Wastewater and Drainage Management Plan will be prepared and implemented to manage wastewater and surface water runoff sources and pathways The construction manager will regularly monitor weather forecasts in order to ensure there is enough time to evacuate if a flash flood is expected to occur Temporary drainage systems would be implemented to alleviate localised surface water flood risk and prevent obstruction of existing surface runoff pathways Flood protection trenches (construction drainage) will be installed around all sites liable to be subject to surface water and/or flooding Natural drainage patterns should be maintained and not obstructed where practicable. This includes in the siting of any construction workers' accommodation camp(s) or laydown areas which should provide enough time to evacuate following a warning of a potential flash flood Any temporary crossings will be constructed such that following a flood warning they can be demountable or if swept away not cause a risk to downstream 	ESIA	Law on Water	Construction Contractor	Water, Wastewater and Drainage Management Plan Emergency Preparedness and Response Plan	Construction programme Availability of Water, Wastewater and Drainage Management Plan Availability of Emergency Preparedness and Response Plan	Inspection records Accident and emergency records
<p>Drinking water wells measures:</p> <ul style="list-style-type: none"> A detailed Water, Wastewater and Drainage Management Plan should be prepared for the works, identifying existing water sources, providing calculations for Project water demand and promoting water use efficiency onsite Promote water efficiency through training. 	ESIA	Law on Water MNS 17.1.1.10:1979. Water. Water use and protection.	Construction Contractor	Water, Wastewater and Drainage Management Plan	Availability of Water, Wastewater and Drainage Management Plan Availability of water supply licence/ permit	Inspection records Permits Grievance register Water efficiency training records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> No surface or groundwater will be used without prior permissions in place. Construction workers will be provided with potable water from approved sources The plan should include measures to minimise water usage and explore opportunities for water reuse where possible, with the promotion of water efficiency through training Local herder wells within the final construction footprint and/or adjacent to Project works will be mapped. Any local herders' wells adjacent to construction works will be demarcated and protected from damage Any loss of wells used by local herders will be replaced 		<p>MNS 17.1.1.14:1980. Hydrosphere. Classification of water use.</p> <p>MNS 4047:1988. Hydrosphere. Procedure for monitoring surface water quality</p> <p>MNS 4586:1998. Water quality</p>			Check whether the workers have received water efficiency training	
<p>Water quality measures:</p> <ul style="list-style-type: none"> Appropriate water quality monitoring when working near the wetland/existing water supply wells. No direct or indirect discharge from the site to ground or surface water features would be permitted, with wastewater to be tankered off site Securing relevant environmental permits and consents for all qualifying works Spill kits made readily available to allow for the rapid clean up of any accidental spills Fuels, oils, flammable liquids and chemicals stored responsibly, away from sensitive water receptors. All refuelling, oiling and use of chemicals would use suitable drip trays and in the event of a spill be cleaned up immediately Wash down of vehicles and wheels will be in designated areas, such that wash water would be prevented from passing untreated into dry riverbeds or infiltrate into the ground An Emergency Preparedness and Response Plan will be developed for the construction phase which will outline procedures to be implemented in case of 	ESIA	<p>Law on Water</p> <p>MNS 17.1.1.10:1979. Water. Water use and protection. Terms and definitions.</p> <p>MNS 17.1.1.14:1980. Hydrosphere. Classification of water use. General requirement</p> <p>MNS 4047:1988. Hydrosphere. Procedure for monitoring surface water quality</p>	Construction Contractor	<p>Water, Wastewater and Drainage Management Plan</p> <p>Emergency Preparedness and Response Plan</p>	<p>Availability of Water, Wastewater and Drainage Management Plan</p> <p>Availability of Emergency Preparedness and Response Plan</p> <p>Availability of procedures for safe handling of fuels and lubricants</p> <p>Weekly inspections of machinery/equipment maintenance and repair areas/ spill kit availability</p> <p>Permits</p>	<p>Inspection records</p> <p>Permits</p> <p>Grievance register</p> <p>Accident and emergency records</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> unplanned events, including but not limited to extreme weather events and pollution incidents Ensure any on site toilets are lined with water-absorbing material and are located outside of areas that could spill into the wetland, infiltrate into the ground near the wells or the dry riverbeds Removal of any construction debris from dry riverbeds. 		MNS 4586:1998. Water quality MNS 0900:2018. Drinking Water – Hygiene MNS 0900:2005. Drinking Water				
Water quality measures: <ul style="list-style-type: none"> Post-construction monitoring of water quality at public water supply wells for an agreed period to compare against pre-Project baseline conditions 	ESIA	Law on Water	Construction Contractor	Water, Wastewater and Drainage Management Plan	Site inspection Post-construction report	Inspection records
Hydromorphology measures: <ul style="list-style-type: none"> Heavy machinery will not cross smaller riverbeds except at formal temporary crossing locations Channels shall be restored if altered by temporary construction activities 	ESIA	Law on Water	Construction Contractor	Water, Wastewater and Drainage Management Plan	Availability of Water, Wastewater and Drainage Management Plan	Inspection records
Social and Community						
The Construction Contractor will prepare and implement a Community Health, Safety and Security Management Plan, to address health and safety measures specifically relevant to community members. This will include reference to: <ul style="list-style-type: none"> Access limitations to restricted working areas including Excavations, stockpiles and construction equipment; including barricades with appropriate warning signs to protect workers and the public. Construction schedules highlighting noisy or dusty open works. 	ESIA	Civil Code, 2002 Law on combating domestic violence, 2016 Law on human rights of persons with disabilities, 2016 Parliament Resolution No. 231 - Action Plan for the Protection of Human	Construction Contractor	Community Health, Safety and Security Management Plan Community Grievance mechanism	Availability of Community Health, Safety and Security Management Plan Availability of Community Grievance Forms and Registers Number of local community meetings attended Trespassing incidents and action measures taken	Inspection records Stakeholder register Community Grievance Form and Register Trespassing incidents

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> Warning signs will be erected at appropriate sites near local access roads. Measures to address the treatment of the public in the event of construction related accidents. <p>The Construction Contractor will also be required to report any trespassing incidents and the measures undertaken in such cases to control the situation and prevent it from occurring again.</p>		Rights in Business Activities				
<p>The Construction Contractor will prepare and implement an Influx management plan to addresses 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.</p>	ESIA, ESAP		Construction Contractor	<p>Community Health, Safety and Security Management Plan</p> <p>Community Grievance mechanism</p>	<p>Availability of Influx management plan</p> <p>Availability of Community Grievance Forms and Registers</p> <p>Number of staff registered from outside the Project Area</p>	<p>Inspection records</p> <p>Community Grievance Form and Register</p>
<p>The Construction Contractor will prepare and implement a Security Management Plan. The Construction Contractor will carry out appropriate checks to ensure that security companies (if any such companies are engaged) and personnel (where reasonably possible) do not have a history of past abuse. 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. Security guards will be directly employed by the Construction Contractor in accordance with their policies and will not be armed.</p>	ESIA, ESAP		Construction Contractor		<p>Availability of Security Management Plan</p> <p>Number of security personnel</p> <p>Training records</p>	<p>Inspection records</p> <p>Community Grievance Form and Register</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
The Construction Contractor CLO will consult regularly with local communities and raises awareness in local schools within the affected communities on any health, safety and security concerns (for example, not entering construction sites, construction traffic, etc). Community liaison will be undertaken in advance of works to ensure that the local community and existing dirt track users are aware of the construction works and associated risks. Warning signs will be erected at appropriate sites along access roads.		As above	Construction Contractor	CSEP	Availability of CSEP Number of meetings held with the local community and soum/bagh leaders	Stakeholder engagement register
The Construction Contractor will promote local workforce recruitment, to be set out in a Local Employment and Procurement Plan. Hiring positions should be disclosed to Project residents and open to all local people of working age and ability, and its recruitment policy should affirm local employment prioritisation, including any reasonable training provision required to enable this.	ESIA	As above	Construction Contractor	Labour Management Plan Community Grievance mechanism	Availability and disclosure of Labour Management Plan and Local Employment and Procurement Plan Review the job advertising and recruitment process Number of job adverts posted and mechanism used to disclose Review the Community Grievance Forms and Registers Copies of issued reference / confirmation of employment letter	Labour / recruitment reports Community Grievance Register Inspection Report
A Community Grievance Mechanism will be established prior to construction to ensure that Project communities have an adequate channel to voice construction health and wellbeing concerns through a simple complaints, resolution and reporting procedure. This shall be widely	ESIA	As above	Construction Contractor	Community Grievance mechanism	Check whether stakeholder grievance mechanism has been disclosed and implemented	Community Grievance Register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
disclosed, publicised, and accessible to all community members, and support the registration, investigation, and redress, of any transgressions, health related or otherwise.					Number and type of grievances Check that the grievances and resolutions are reported to PIU on monthly basis	
All workers will be issued a Code of Conduct and inducted for cultural sensitisation and site safety procedures. Community awareness and responsibility training (that includes instruction on sexual harassment, conduct, and health, gender and local culture and traditions) will be included as part of the induction programme for all Project contractors and their workforce. All contractors/workforce employees and subcontractors will be issued with a Code of Conduct addressing expectations and punitive measures concerning their discipline and behaviour (including for inappropriate sexual fraternisation) in project-affected communities.	ESIA	Labour Code	Construction Contractor	Community Health and Safety Management Plan Training Plan Code of Conduct Project/ Construction SEP Community Grievance mechanism	Availability and content of community awareness and responsibility training, and training records/register Availability of Code of Conduct Check whether training has been included in induction training Number of community grievances	Training records/register Grievance form and register
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' ⁴ . The Construction Contractor will: <ul style="list-style-type: none"> Comply with the Project Discrimination and Harassment Policy and Project Gender Equality and GBVH Action Plan. Raise awareness about gender and GBVH risks, and necessary actions for workforce security. 	ESIA		Construction Contractor	Discrimination and Harassment Policy Community Grievance Mechanism	Availability of Discrimination and Harassment Policy Availability of Gender Equality and GBVH Action Plan Availability of Code of Conduct Gender disaggregated workforce data	Inspection records Grievance register

⁴ Available at: <https://assets.cdcgroup.com/wp-content/uploads/2020/07/14193353/Addressing-GBVH-in-the-construction-sector.pdf>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> Promote open discussions about GBVH and SEAH concerns through disclosure of gender awareness materials/training and implementation of effective Project and employee grievance mechanisms. Attend / support training on the Code of Conduct and GBVH. <p>Maintain gender disaggregated workforce data and provide such data as part of monthly reporting to the MoE/PIU.</p>					Community Grievance Mechanism	
With respect to vulnerable people, additional measures will be put in place by the Construction Contractor where they may be affected by the construction phase. This will include, for example, targeted stakeholder engagement (at a location suitable for the stakeholder), support with applications for employment, accessible grievance channels and support in transport to engagement events.	Construction Contractor		Construction Contractor		Review of measures put in place Community Grievance Mechanism	Inspection records Grievance register
<p>A Traffic Management Plan will be developed and implemented. It will include the identification and designation of construction traffic routes to site, that avoid herder households or any well-used routes that could interfere with local access. It is recommended that a distance of 100m is maintained between identified gers and construction related vehicles. Where this is not possible, all project employees and transport providers should be strictly required to limit their speed when passing near project settlements as part of their contractual obligations, with contract suspension or cancellation if not adhered to. Project local authorities must be made aware of this obligation so they can help hold contractors and employees to account.</p> <p>Speed limits shall be imposed on construction traffic to minimise risk of accidents, especially where construction</p>	Construction Contractor		Construction Contractor	Traffic Management Plan Community Grievance Mechanism	<p>Availability and the content Traffic Management Plan</p> <p>Weekly inspections of the construction site access roads used</p> <p>Community Grievance Mechanism</p>	<p>Inspection records</p> <p>Incidents and Accidents Form and Register</p> <p>Grievance register</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>traffic is using the public road and at entrance/egress points onto the public road.</p> <p>Wherever possible, the existing dirt road should be used as the access road, with no new haul roads installed.</p> <p>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.</p> <p>Appropriate ingress/egress required where construction traffic requires to move to/from the access road to a public road.</p> <p>Place warning signs at each intersection/ exit/ entrance junctions.</p> <p>Provide temporary signs along any access roads.</p>						
<p>Manage demand on infrastructure, through the following:</p> <ul style="list-style-type: none"> Prioritise local recruitment to reduce accommodation, catering and utility demands where these are limited Prepare details on water and power requirements in liaison with suppliers and regulators, to avoid exceeding local capacity; coordinate with the relevant water utility company(ies) for securing additional water requirements of the Project Coordinate with the relevant water utility company for disposal of wastewater at the nearest waste water treatment plant or other arrangements as appropriate Coordinate with the relevant aimag or hire a qualified private contractor to collect solid waste from the site and transport it to the nearest authorised landfill 	ESIA		Construction Contractor	<p>ESMS</p> <p>CESMP</p> <p>Water management plan</p> <p>Waste management plan</p>	Availability of relevant permits and agreements	<p>Legal agreements / contracts</p> <p>Inspection reports</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> Coordinate with a private contractor for the collection of hazardous waste from the site to dispose of at a Hazardous Waste Treatment Facility 						
Avoid damage to existing infrastructure and utilities during the construction of the substation and the OHTL from inappropriate construction activities. Should any damage occur, restoration and/or compensation activities will be undertaken by the Construction Contractor. As part of induction training, it must be emphasised to all workers the presence of such infrastructure elements within the Project site. It must also be emphasised that all activities should be restricted to designated areas and that it is strictly prohibited to approach such elements or its buffer area.	ESIA		Construction Contractor	CESMP Site Restoration Plan	Availability of CESMP	Inspection reports
The Construction Contractor to develop an Emergency Preparedness Plan to internationally recognised best practice standards to reduce safety risks during the construction period. Periodic emergency drills will be held with the local community and soum/bagh governments, to test the functionality of evacuation procedures, communication flows, first-response capacity, and stakeholder coordination mechanisms. Findings from the emergency response drills will be documented and communicated in lessons learned bulletins or shared with the relevant parties such as the regulators.	ESIA		Construction Contractor	Emergency Preparedness Plan	Availability of Emergency Preparedness Plan Number of incidents and accidents Number of emergency drills undertaken with the local community	Inspection reports
Economy, Employment and Livelihoods						
The Construction Contractor will be required to develop and implement a Construction Labour Management Plan that aligns with the Project Labour Management Plan and complies with applicable national labour laws and	ESIA	Civil Code, 2002 Law on Land, 2002 Law on Allocation of Land to Mongolian	Construction Contractor	Labour Management Plan	Availability of Labour Management Plan Number of locals employed on the project	Contracts Inspection records Grievance register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>EBRD Performance Requirement 2, to manage labour processes, which will include:</p> <ul style="list-style-type: none"> Details of a recruitment process which is transparent and fair. Details of 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). Details of specific measures to promote employment on the basis of non- discrimination, ensuring that applications are received from under-represented groups such as women. Details of the training opportunities which will be provided on technical, health and safety and manual work, where suitable. 		<p>Citizens for Ownership, 2002</p> <p>Law on Protection of Cultural Heritage 2016, as amended</p> <p>Labour Code, 2021</p> <p>Law on Minimum Wage, 2010</p>		<p>Local Employment and Recruitment Policy</p> <p>Community grievance mechanism</p>	<p>Review the Community Grievance Forms and Registers</p> <p>Report on numbers of local workers and provide gender-disaggregated workforce numbers in construction monitoring reports</p>	<p>Meeting notes and records</p>
<p>Develop and implement a Local Employment and Procurement Policy and Plan to ensure priority is given to employing the local workforce where the skills are appropriate.</p> <p>The Local Employment and Recruitment Plan should be strongly affirmative in promoting local employment, especially among marginalised and vulnerable persons, including the provision of any reasonable training needs to facilitate the employment and upskilling of applicants from the project affected area. To promote local businesses, the Plan will include a mapping exercise of local, regional and national small and medium enterprises, including the local herder supply chain.</p> <p>The Plan will cover all aspects, from the analysis of the existing skills available at a local, regional and national level, to the processes of employment and use of women, as well as promoting the use of local goods and</p>	ESIA	<p>Civil Code, 2002</p> <p>Law on Land, 2002</p> <p>Law on Allocation of Land to Mongolian Citizens for Ownership, 2002</p> <p>Law on Protection of Cultural Heritage 2016, as amended</p> <p>Labour Code, 2021</p> <p>Law on Minimum Wage, 2010</p>	Construction Contractor	<p>Labour Management Plan</p> <p>Local Employment and Recruitment Policy</p> <p>Community grievance mechanism</p>	<p>Availability of Labour Management Plan</p> <p>Number of locals employed on the project</p> <p>Records regarding job advertising and recruitment process</p> <p>Check that the collaboration with local authorities took place</p> <p>Evidence of collaboration/ meetings with local authorities, meeting notes etc.</p>	<p>Contracts</p> <p>Inspection records</p> <p>Grievance register</p> <p>Meeting notes and records</p>



Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>services. It will also consider opportunities for collaborating with local senior schools to develop apprenticeship and graduate programmes. Measures will be put in place within the Plan to ensure that the procurement process avoids exploitative practices and child labour. This may include, for example, the requirement for training of those responsible for the recruitment process, the provision of contractual clauses for workers and sub-contractors and the requirement for labour audits</p> <p>The Plan will include recruitment targets and KPIs, in line with targets set out in the Project Labour Management Plan. Reporting on the KPIs, including gender disaggregated workforce data, will be provided as part of monthly reporting to the MoE/PIU on key topics such as local employment and number of women employed,</p> <p>To support local employment and development, the Policy, recruitment process and employment positions will be fully disclosed to the public and residents within the Project affected baghs and soums; and be open to all people locally of working age and ability, including women.</p> <p>To assist with preferential employment opportunities to local communities, individuals planning to reside temporarily in a location should register with local authorities. As there is a history of outside workers moving to the Project Area for work prior to the start of a project, the Construction Contractor should ensure that they work with the local authorities to favour local community members that have been residing in the Project Area long-term.</p>					<p>Reports on KPIs</p> <p>Review the Community Grievance Forms and Registers</p> <p>Report on numbers of local workers and provide gender-disaggregated workforce numbers in construction monitoring reports</p>	

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>The Construction Contractor shall procure goods locally wherever possible including perishable goods provided by herder households who could adversely affected by the Project. The exception to this is illegally obtained goods, such as meat from poaching.</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>						
Contractors shall ensure their recruitment process is fully disclosed to the public and open to all people locally of working age and ability, including women. The process should be based on appointment by merit rather than by any political, clan, or class affiliation but should be affirmative with regard to promoting opportunities to less advantaged and more vulnerable people locally.	ESIA	As above	Construction Contractor	Labour Management Plan Grievance mechanism	Records regarding job advertising and recruitment process Review the Community Grievance Forms and Registers	Inspection records Community Grievance Form and Register
<p>A CLO will be appointed by the Construction Contractor to facilitate engagement with the local communities in relation to labour opportunities. The following measures should be used for outreach to the local community:</p> <ul style="list-style-type: none"> Facebook and television for public outreach Subdistrict groups online Telegram and Viber within institutions Sharing information at bagh and soum citizens meetings Utilising existing outreach from soum representatives with local herders 	ESIA	As above	Construction Contractor	Labour Management Plan Local Employment and Procurement Policy and Plan CSEP Community grievance mechanism	Availability of Labour Management Plan Number of locals employed on the project	Contracts Inspection records Grievance register
Develop and implement a Training Plan to promote upskilling and ensure workers are appropriately trained.	ESIA	As above	Construction Contractor	Labour Management Plan	Training plan / programme	Training records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
On completion of their employment the construction workforce will be provided with a reference / confirmation of employment letter, that includes the training / skills log, to support their future employment applications.	ESIA	As above	Construction Contractor	Labour Management Plan Grievance mechanism	Availability and disclosure of Labour Management Plan Copies of issued reference / confirmation of employment letter	Community Grievance Form and Register Inspection Report
Land Use, Tenure and Displacement						
The Construction Contractor will implement a CESMP to limit adverse effects occurring beyond working areas and a Traffic Management Plan to manage construction and local traffic within agreed routes.	ESIA	The Constitution of Mongolia, 1992 Civil Code, 2002 Law on Land, 2002 Law on Allocation of Land to Mongolian Citizens for Ownership, 2002 Law on Protection of Cultural Heritage 2016, as amended Labour Code, 2021 Law on Minimum Wage, 2010 Law on Occupational Health and Safety, 2008	Construction Contractor	CESMP Construction Traffic Management Plan Grievance mechanism	Availability of CESMP Availability of Traffic Management Plan Grievance mechanism	Community Grievance Form and Register Inspection Report
Timing of construction works will be such to minimise impact on herders, where possible e.g. during summer months. To ensure there are no additional impacts that could affect use of grazing lands, the Construction Contractor will:	ESIA	As above	Construction Contractor	CESMP Grievance mechanism	Availability of various plans	Inspection reports

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> Advise local communities and herders in advance of works Restrict clearance and construction works to within designated working areas Non-potable water sources will be determined to minimise local impacts on water supply and drinking water for construction workers will be sourced from bottled containers which will be delivered to the construction compounds Implement the Code of Conduct Produce and implement a Pollution Prevention Plan Produce and implement a Waste Management Plan Produce and implement a Grievance Mechanism 						
<p>The Construction Contractor will be required to 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"> Coordinate with the relevant authorities and asset owners to identify 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 Avoid 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. <p>All consultations will include formal communications.</p>	ESIA		Construction Contractor/MoE/PIU/NPTG	ESMS	<p>Availability of Infrastructure Strategy</p> <p>Records of engagement and land use agreements with infrastructure owners</p>	Legal documents
Access will be maintained to all herder households during construction.	ESIA		Construction Contractor	LARF	Records of mitigation measures / compensation provided	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
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.				Community grievance mechanism	Records of grievance related to land use and access	Grievance register
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.	ESIA		Construction Contractor	Local Employment and Procurement Policy and Plan Community grievance mechanism	Monitoring reports as part of monthly reporting to the PIU Where required, record of implemented mitigation measures	Inspection records Grievance register
Labour and Working Conditions						
Construction Contractor to have all necessary permits in place. Maintain Project permit register up-to-date.	ESIA		Construction Contractor	ESMS	Availability of permit documents / approvals	Inspection records Legal documents
PIU to monitor Construction Contractor to ensure permits are in place and their compliance with permit requirements.	ESIA, ESAP		PIU	ESMS	Availability of permit documents / approvals	Inspection records
The Construction Contractor will: <ul style="list-style-type: none"> Comply with all Project policies and plans. Comply with the Project Discrimination and Harassment Policy, to promote equal opportunities. Comply with the Project Code of Conduct. The Construction Contractor will ensure that all staff have signed the Code of Conduct and will provide induction programme for construction staff, including sub-contractors and their workers on the Code. 	ESIA	Labour Code	Construction Contractor	ESMS	Number of grievances Signed Code of Conducts for all workers	Inspection records Labour Grievance Forms and Register Community Grievance Forms and Register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<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. • 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. 	ESIA	Labour Code	Construction Contractor	Labour Management Plan	<p>Availability of Labour Management Plan</p> <p>Availability of Labour Grievance Mechanism</p> <p>Spot check of staff understanding of the Labour Management Plan and related policies</p> <p>Availability of worker contracts</p> <p>Number of grievances</p> <p>Check that the grievances and resolutions are reported to PIU on monthly basis</p>	<p>Inspection records</p> <p>Labour Grievance Forms and Register</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> 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. 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>A zero-tolerance process will be in place for discrimination against workers.</p> <p>All workers will have employment contracts</p> <p>See Appendix E for an outline Labour Management Plan.</p> <p>The HR policy and Labour Management Plan will be readily available and understandable to all employees.</p>						
The Construction Contractor will be required to perform monthly labour auditing during construction (monthly and annually) to identify any gaps in payment, provision of personal protective equipment and/or any other concerns regarding human resources. Include a focus on vulnerable employees.	ESIA	Labour Code	Construction Contractor	Labour Management Plan	<p>Availability of monthly labour audits</p> <p>Number of non-compliances identified and closed out</p>	Inspection records
Periodic inspections will be undertaken by the PIU (or their representatives) at least every 6 months during construction to monitor the Construction Contractor's	ESIA	Labour Code	PIU	Project ESMS	Availability of ESMS and inspection programme	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
performance against Project requirements, national legislation and applicable ILO standards. Actions will be tracked and a feedback loop provided to the Construction Contractor. This will include site visits, covering the site and workers' camps.				Labour Management Plan		
Before work begins, the Construction Contractor will conduct a thorough risk assessment. This will include consideration of any works close to other structures, including the existing OHTLs. The Construction Contractor will be compliant with relevant measures as set out in EBRD's Briefing Note 01: Underground and overhead services ⁵ , Electric power and distribution health and safety toolkit ⁶ and Working near Overhead Cables ⁷ . It will also take into consideration remote working and natural hazards; and, as discussed below under OHS, will include a review of medical facilities in the Project Area and emergency protocols (see OHS below for further details). A Construction Risk Register for the Project will be developed and maintained by the Construction Contractor.	ESIA	Labour Code	Construction Contractor	OHS Management Plan	Availability of risk assessment and risk register Number of incidents and accidents reported	Inspection records Risk assessment forms
Prepare and implement a Workers' Camp Management Plan . Worker camps will be established in accordance with EBRD/IFC guidance: Workers' accommodation: processes and standards ⁸ . Prepare for approval by PIU a Camp Management Plan prior to construction. Code of Conduct to include measures for construction camp living. Accommodation	ESIA	Labour Code	Construction Contractor	Workers' Camp Management Plan Code of Conduct Labour Management Plan	Availability of Workers' Camp Management Plan Code of Conduct in place and evidence of training of personnel in the Code Necessary permits in place	Inspection record Labour Grievance Form and Register Permits

⁵ Available at: [How to implement our performance requirements](#)

⁶ Available at: [How to implement our performance requirements](#)

⁷ Available at: [Working near overhead cables_En.pdf](#)

⁸ EBRD/IFC (August 2009), Workers' accommodation: processes and standards. A guidance note by IFC and EBRD. Available at: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_workersaccommodation

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>and amenity provision of migrant employees in camps located outside, and delineated from, existing Project settlements</p> <p>Any workers' camp must be over 1 km from any residential settlements.</p> <p>The construction workers' accommodation will be staffed and equipped with healthcare facilities for all workers, to avoid straining the available healthcare facilities that are serve the local communities.</p> <p>Preference for migrant workers to be accommodated in a workers' accommodation camp.</p> <p>Monitoring of camp conditions against the requirements of the Guidance Note on a monthly basis as a minimum.</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>Monthly inspection of the camp and inspection reports prepared for issue to PIU</p> <p>Availability of Labour Grievance Mechanism</p> <p>Number of grievances</p>	
The construction workers' accommodation camp will be staffed and equipped with healthcare facilities for all workers, to avoid straining the available healthcare facilities that are serve the local communities. Undertake staff health checks – periodic physical checks for all construction staff.	ESIA		Construction Contractor	OHS Plan	<p>Facilities included in Workers' Accommodation Camp Management Plan</p> <p>Check the schedule of medical records</p>	<p>Inspection Records</p> <p>Schedule of medical records</p>
<p>Review constructors' labour accommodation strategy and principles.</p> <p>Review of Contractor's monthly camp inspection reports.</p> <p>Undertake 6-monthly camp inspections or if issues are identified through review of the Contractor's inspection reports.</p>	ESMP		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.	Inspection Records
<p>For gender measures the MoE/PIU will:</p> <ul style="list-style-type: none"> Implement a zero-tolerance process for discrimination against women 	ESIA	Law on Ensuring Gender Equality	PIU	<p>Project ESMS</p> <p>Project supply chain policy and procedure</p>	Availability of Gender Equality and GBVH Action Plan	<p>Inspection record</p> <p>Grievance register</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> Develop a stand-alone Gender Equality and GBVH Action Plan Promote open discussions about GBVH concerns Set KPIs, for example, in relation to increasing the number of women working in the construction sector and the number of GBVH cases Support the Construction Contractor on training in GBVH Work with the Construction Contractor to undertake community awareness sessions in relation to GBVH and the mechanisms available for reporting any incidents (in advance of the construction activities, including mechanisms that exist via local health organisations and the police) 				Labour and Community Grievance Mechanisms	Umbrella of Labour and Community Grievances related to gender and GBVH	
<p>For gender measures the Construction Contractor will:</p> <ul style="list-style-type: none"> Implement a zero-tolerance process for discrimination against women Comply with the Project Discrimination and Harassment Policy Comply with the Project Code of Conduct Raise awareness about gender and GBVH risks, and necessary actions for workforce security Promote and develop a mentoring programme for women in the construction workforce Report on gender-disaggregated workforce numbers in construction monitoring reports 	ESIA	Law on Ensuring Gender Equality	Construction Contractor	Discrimination and Harassment Policy Code of Conduct Labour and Community Grievance Mechanisms	Availability of mentoring programme for women in the construction workforce Reports on gender-disaggregated workforce numbers and gender-based KPIs Training programme Labour and Community Grievances	Inspection record Monitoring report Training records Grievance register
<p>For supply chain measures the MoE/PIU will:</p> <p>Develop a Project supply chain policy and procedure that covers:</p> <ul style="list-style-type: none"> Inclusion of relevant ESAP requirements in contracts/subcontracts. 	ESIA	Labour Code	PIU	Project ESMS Project supply chain policy and procedure Labour and Community	Availability of Project supply chain policy and procedure Labour and Community Grievance Mechanisms	Grievance register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> 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. Inspection and auditing requirements and frequency. <p>Key performance indicators (KPIs) for the supply chain.</p>				Grievance Mechanisms		
<p>For supply chain measures the Construction Contractor will:</p> <ul style="list-style-type: none"> Comply with the Project Supply Chain Policy and 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 Prior to engaging suppliers, perform supply chain due diligence/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 to the PIU or their nominated organisation e.g. the Construction Supervision Engineer 	ESIA	Labour Code	Construction Contractor	<p>Project ESMS</p> <p>Project supply chain policy and procedure</p> <p>Labour and Community Grievance Mechanisms</p>	<p>Availability of Supply Chain Management Plan</p> <p>Verification of supply chain audits</p> <p>Labour and Community Grievance Mechanisms</p>	<p>Supply chain audits</p> <p>Inspection reports</p> <p>Grievance register</p>
Construction workers will be provided with a safe and healthy work environment, taking account of inherent	ESIA	Labour Code	Construction Contractor	Labour Management Plan	Availability of Labour Management Plan	Construction Risk Register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>risks and specific classes of hazards associated with the Project.</p> <p>The Construction Contractor and sub-contractors will develop procedures to avoid hazards and, where this is not possible, mitigate the risks to the workforce in accordance with the hierarchy of risk management prior to works, including risk assessments prior to works in line with Briefing Note 01: Underground and overhead services⁹, Electric power and distribution health and safety toolkit¹⁰ and Working near Overhead Cables¹¹.</p>				Construction Risk Register	<p>Availability of risk assessments</p> <p>Training programme</p>	Training records
<p>The Construction Contractor will implement and maintain an OHS Plan. This will consider the specific risks associated with the Project, including legislative compliance and duty of care requirements. All workers will be equipped with proper PPE (e.g., masks, eye goggles, breathing equipment, gloves, EMF shielding clothing, etc.). Workers engaged in tasks at elevated heights must wear full-body harnesses and be equipped with lanyards or lifelines. Employees will not be allowed to work in extreme weather conditions. Proper rest and breaks will be provided.</p> <p>OHS Plan requirements to include (but not to be limited to):</p> <ul style="list-style-type: none"> • Site Rules • Job and task specific hazard analysis and controls for all activities. • Requirements for and enforcement of PPE use. • Safety training for personnel. 	ESIA	<p>Law on Occupational Health and Safety, 2008</p> <p>Law on Health, 2011</p> <p>Law on Labour Safety and Hygiene, 2008</p> <p>Law on Hygiene, 2016</p>	Construction Contractor	<p>OHS Plan</p> <p>Labour and Grievance Mechanism</p>	<p>Availability of OHS Plan</p> <p>Daily check of weather conditions and work schedule</p> <p>Labour and Grievance Mechanism</p>	<p>Inspection records</p> <p>Incidents and accidents register</p> <p>Grievance register</p>

⁹ Available at: [How to implement our performance requirements](#)

¹⁰ Available at: [How to implement our performance requirements](#)

¹¹ Available at: [Working_near_overhead_cables_En.pdf](#)

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> Develop and implement an emergency response procedure. Oversight of contractor OHS development / implementation, including mandatory reporting to PIU. Maintain statistics of total work hours, lost time, incidents, injuries, near misses etc. Toolbox talks to share information on risks, accident prevention, etc. 						
<p>Prior to any construction, the Construction Contractor will implement and disseminate an Emergency Preparedness and Response Plan developed in liaison with local community members, authorities, police and emergency services.</p> <p>This will cover the requirements of national law and EBRD PR4 and detail preventative measures for all incidents, including identification of potential risks and emergencies e.g. spills, fires, collisions, worker injury; roles and responsibilities and procedures for responding to identified risks and emergencies; emergency response equipment requirements; and the location of the nearest medical treatment facilities.</p> <p>It should include as a minimum:</p> <ul style="list-style-type: none"> Identification of potential emergencies and risk assessments e.g. spills, fires, collisions, worker injury 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 	ESIA	<p>Law on Labour Safety and Hygiene, 2008</p> <p>Law on Disaster Protection 2017</p>	Construction Contractor	Emergency Preparedness and Response Plan	<p>Availability of Emergency Preparedness and Response Plan</p> <p>Check that local health facilities have been identified, and capacity of health facilities has been estimated</p> <p>Reports to organisations on disasters</p>	<p>Inspection records</p> <p>Incidents and Accidents Register</p>



Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> • Muster points, evacuation routes • Training requirements • Communication protocols to workers, public and other affected parties • Location of nearest medical facilities • Update and review cycle <p>The Construction Contractor will identify the relevant first aid, clinical and hospital treatment points, in liaison with these providers and provide an on-site physician.</p> <p>As part of the Emergency Preparedness and Response Plan, the Construction Contractor will identify suitable health facilities for workers in liaison with local health facilities to ensure demand is not to detriment of local users. Requirements for local health facilities will be carefully coordinated.</p> <p>The Construction Contractor will provide timely information on disaster protection activities, disasters and dangerous situations to higher level organizations and emergency organisations as necessary under Mongolian law.</p> <p>Project specific emergency response drills shall be carried out 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</p>						

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>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 • Emergency Response Team organisation 						
<p>The Construction Contractor must conduct an initial safety induction course for construction workers regarding: health and safety measures; and emergency response in case of accidents, fire, earthquakes, landslides, flash flooding, environmental and community interactions, etc. The Construction must also develop and implement a safety and security training programme and conduct safety meetings on a monthly basis.</p> <p>Conduct regular safety training for operators.</p>	ESMP	Labour Code Law on Labour Safety and Hygiene, 2008	Construction Contractor	OHS Plan Labour Management Plan Training Plan	Availability of OHS Plan Availability of Labour Management Plan Training programme	Training records
<p>The Construction Contractor will maintain records on incidents and accidents and demonstrate continuous improvement.</p> <p>Regular reporting on the health and safety performance onsite will be required, in addition to reporting of any accidents, incidents and/or emergencies and the measures undertaken.</p>	ESMP	Labour Code Law on Labour Safety and Hygiene, 2008	Construction Contractor	OHS Plan Labour Management Plan Training Plan	Number of incidents and accidents	Inspection record

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Incoming workers should be enrolled in health insurance and participate in at least basic preventive health screenings.	ESIA	Labour Code	Construction Contractor	Labour Management Plan	Availability of Labour Management Plan	Health records
<p>The Construction Contractor will conduct due diligence investigation for all security 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>	ESIA		Construction Contractor	Labour Management Plan Supply Chain Management Plan Security Plan	Availability of Labour Management Plan Availability of Supply Chain Management Plan Check that security staff are hired and available Check suitability of security staff Number of grievances reported in relation to security personnel Due diligence carried out and documented/reported to PIU. Training evidence/records. Report to EBRD any incidents involving security guards.	Inspection record
<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. This will be accessible to staff and sub-contractors.</p> <p>Reporting of grievances and resolutions proposed to be reported to PIU as a minimum in monthly reports.</p>	ESIA	Labour Code	Construction Contractor	Labour Grievance Mechanism Code of Conduct	Availability of Labour Grievance Mechanism Adoption of formal labour grievance mechanism for contractor employees in line with Project ESMS. Number of grievances	Labour Grievance Forms and Register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
					Check that the grievances and resolutions are reported to PIU on monthly basis	
<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>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.</p>	ESMP		PIU	Project ESMS	<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>	Inspection record
Climate Resilience						
Inspect equipment regularly to ensure that systems have not been damaged by climate events, including extreme heat, extreme cold, sand deposition and windblown debris.	ESIA	Law on Disaster Protection 2017	Construction Contractor	Emergency Preparedness and Response Plan	Availability of Emergency Preparedness and Response Plan	<p>Inspection records</p> <p>Incidents and Accidents Register</p>
Provide sufficient PPE for staff to avoid impacts associated with overheating, hypothermia, storm events, flooding, and other extreme climate events.	ESIA	Law on Disaster Protection 2017	Construction Contractor	OHS Plan	Availability of OHS Plan	Inspection records
Ensure that any HVAC (heating, ventilation, and air conditioning) systems present on site are inspected regularly to ensure they are clear of any dust or debris that may have accumulated.	ESIA	Law on Disaster Protection 2017	Construction Contractor	Site Construction Management Plan	Availability of Site Construction Management Plan	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Equipment should be stored away from trees or structures when not in use to avoid damages that may occur as a result of high winds and/or storm events.	ESIA	Law on Disaster Protection 2017	Construction Contractor	Site Construction Management Plan	Availability of Site Construction Management Plan	Inspection records
Equipment should be stored away from any nearby water bodies when not in use to avoid damages that may occur as a result of flooding.	ESIA	Law on Disaster Protection	Construction Contractor	Emergency Preparedness and Response Plan	Availability of Emergency Preparedness and Response Plan	Inspection records Incidents and Accidents Register
Monitor weather forecasts on a weekly basis and plan activities accordingly, and avoid working at height during high wind speeds.	ESIA	Law on Disaster Protection	Construction Contractor	Site Construction Management Plan	Availability of Site Construction Management Plan	Incidents and Accidents Register
Ensure electrical equipment is powered down during storm events to mitigate potential impacts arising from power surges.	ESIA	Law on Disaster Protection 2017	Construction Contractor	OHS Plan	Availability of OHS Plan	Inspection records
Keep temporary flood barriers and pumps on site for use during high rainfall events to mitigate the risk of flooding.	ESIA	Law on Disaster Protection 2017	Construction Contractor	Emergency Preparedness and Response Plan	Availability of Emergency Preparedness and Response Plan	Inspection records Incidents and Accidents Register
Dust suppression techniques should be utilised on site to mitigate the impacts associated with sand accumulation.	ESIA	Law on Disaster Protection 2017	Construction Contractor	Air Quality Management Plan	Availability of Air Quality Management Plan	Inspection records
Flammable materials should be stored away from structures and equipment to reduce the risk of wildfire spread.	ESIA	Law on Disaster Protection 2017	Construction Contractor	Emergency Preparedness and Response Plan	Availability of Emergency Preparedness and Response Plan	Inspection records Incidents and Accidents Register

Table 7-3 Operation and Maintenance Environmental and Social Mitigation and Control Measures

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Noise and Vibration						
The substations will be designed to the relevant standards.	ESIA	Law on Environmental Protection 1995, as amended Law on Environmental Impact Assessment 1998, as amended MNS 5003:2000. General Requirements for the Measurements of Noise MNS 5002:2000. Occupational Safety and Health. Noise. Requirements for General Safety.	NPTG	Design Document Grievance mechanism	Verification of standards met in final design Number of grievances	Final design drawings / report Grievance Register
It is recommended any future accommodation in the general area of the Tsagaan Suvarga substation that may be introduced should be located at least 100m from the Tsagaan Suvarga substation.	ESIA	-	NPTG / Tsagaan Suvarga mine (MAK)	Grievance mechanism	Observation Number of grievances	Inspection Grievance Register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Biodiversity, Flora and Fauna						
<p>Brief O&M workers on likely presence and identification of Rare and Endangered flora to ensure any additional locations of these plants which haven't been found in this study, can be identified and protected.</p> <p>O&M workforce should be briefed on the risks of wildfires and enforcement measures should be put in place for those not following the safe working protocol.</p> <p>Brief O&M workers on likely presence of fauna (particularly large mammals) and what procedures to take if they are found.</p> <p>Educate O&M workers and ensure strict enforcement of policies against unauthorized gathering of rare plants.</p> <p>Monitor unauthorised activities, such as gathering of plants, and enforce strict penalties for violations.</p> <p>O&M workers should be briefed and educated on the importance of not removing or disturbing active nests on towers, as well as the appropriate steps to take if they are found. Ideally any O&M 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 O&M 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.</p>	ESIA	<p>Law on Environmental Protection 1995, as amended</p> <p>Law on Environmental Impact Assessment 1998, as amended</p> <p>Law on Special Protected Areas 1994, as amended</p> <p>Law on Fauna 2000, as amended</p> <p>Law on Natural Plants, 1995, as amended</p> <p>Law on Soil Protection and Prevention from Desertification, 2012</p> <p>Law on Water (various amendments)</p> <p>MNS standards on soil, water, and air quality.</p>	NPTG	Biodiversity Management Plan	<p>Availability of Biodiversity Management Plan</p> <p>Training plan</p> <p>Site inspections</p>	<p>Inspection records</p> <p>Training records</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>For any O&M activities for habitats:</p> <ul style="list-style-type: none"> Use of low-impact construction methods and vehicles, for example, plant/machinery with spread load to preserve surrounding vegetation and prevent ground compaction. Sensitively locate any compounds/lay-down areas and access routes to avoid undisturbed habitat and flora wherever possible. This could include utilising existing tracks across the landscape. Soil reinstatement for any habitats degraded by O&M works. While working in the marshy area and dry riverbeds (where groundwater could be close to the surface), heavy machinery will not cross smaller riverbeds except at formal temporary crossing locations; and channels shall be restored if altered by temporary construction activities. Designated refuelling stations should be established with suitable ground protection and spill kits on site. Reduce impacts from dust (includes dust suppression techniques) and vehicle emissions. Where impact to Rare and Endangered plants is unavoidable, translocation of plants should be completed by competent and experienced professionals. Ensure no herbicides are used. Inspect and clean construction equipment and clothing to prevent the introduction of invasive plant species. Monitor for invasive species and implement immediate removal strategies if detected. Fire prevention and management controls should be enforced, including segregated and monitored smoking and cooking zones with appropriate disposal facilities for 	ESIA	As above	NPTG	Biodiversity Management Plan	<p>Availability of Biodiversity Management Plan</p> <p>Site inspections</p>	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>cigarettes and lighting equipment, and maintenance of plant with increased security and surveillance.</p> <ul style="list-style-type: none"> A zero-tolerance policy for littering should be made clear and a waste management programme should be exercised. Appropriate disposal facilities should also be provided and include segregation, secure storage, and timely disposal of waste. This should be monitored and remedial litter picking conducted as required. 						
<p>For any O&M activities for fauna:</p> <ul style="list-style-type: none"> Prior to any vegetation clearance, the area will be walked to flush mammals (and other fauna such as reptiles and invertebrates) out of the clearance area. The clearance will then be completed in a systematic way (i.e. working from one side to the other), to allow further movement of animals away from the area of works. Excavations should avoid any animal burrows noted in the area. Low speed limits for vehicles should be enforced to reduce the probability of animal collisions. No nighttime working is proposed, and so artificial light to allow such works will not be required. If this changes, an appropriate method of works will need to be put in place to ensure light spill does not disturb surrounding mammals. This is likely to include directional lighting of low lux levels, as well as a strategy for nighttime driving. Mammals are likely to move away from a working area naturally, utilising other areas of the landscape as an alternative. If on approaching an area of works at the start of the working day, large mammals are found to be using a water source to drink, the O&M activities should be suspended until these animals naturally move off. Similarly, if large mammals start to approach working areas to access a nearby water source, O&M activities should be suspended until these animals naturally disperse to at least 50m. This approach is especially important at Uushiin Govi and Ganzaga Uuliin Urgutgul LPA where the main distribution of Red Listed large mammals were found during survey work (Uushiin Govi 	ESIA	As above	NPTG	Biodiversity Management Plan	<p>Availability of Biodiversity Management Plan</p> <p>Site inspections</p>	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>LPA is also designated as it supports populations of these species).</p> <ul style="list-style-type: none"> A strict ban on poaching should be enforced. 						
<p>For any O&M activities for birds:</p> <ul style="list-style-type: none"> Clearance of low vegetation should ideally avoid the bird breeding season (March to August inclusive). If this is not possible, the area of vegetation clearance should be walked prior to clearance to check for bird nests. If an active nest is found (being built / attended by adult / contains eggs or young), then a no-works buffer zone of at least 20m around the nest should be applied until all chicks have fledged the nest. This buffer should be clearly marked out. Vegetation removal outside a 20m buffer of an active nest can continue, however the vegetation and nest can only be removed once the bird has finished the nesting cycle. O&M activities with high levels of noise should ideally be avoided within a 500m buffer of any raptor nest (particularly species of conservation concern, of which Cinereous Vulture was recorded nesting) while the nest is active. A nest site of this species is located outside this 500m buffer, however any new nests or additional High value raptor species noted should have the 500m buffer applied. Appropriate demarcation and signage should be applied around this buffer. Once nesting is complete, works can continue within the buffer area. If it is essential to carry out work within this 500m buffer during O&M 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. 	ESIA	As above	NPTG	Biodiversity Management Plan	<p>Availability of Biodiversity Management Plan</p> <p>Site inspections</p>	Inspection records
<p>There are no feasible options for repositioning of the OHTL to avoid the habitats at Areas 1, 3, 4 and 5, therefore bird diverters are proposed to reduce the collision risk.</p> <ul style="list-style-type: none"> Area 1 – Pylon No. 18 to 32 	ESIA	As above	NPTG	n/a	Bird divertors installed	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> Area 3 – Pylon No. 462 to 472 Area 4 – Pylon No. 513 to 526 Area 5 – Pylon No. 643 to 667 <p>The easiest bird diverters to install which also require very little/no maintenance, are coloured line spacers. If line spaces are included in the specification of the OHTL, then this would be the recommended option for bird diverters. Alternative bird diverters include coils, hanging 'flags' and globes, often attached the earth wire of the OHTL. Coil diverters are perhaps most appropriate for Gobi conditions due to their durability, while globes can be seen on existing OHTLs in Mongolia where they pass over roads</p>						
<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 and autumn 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>	<p>ESIA</p> <p>Biodiversity Management Plan</p>		NPTG	Biodiversity Management Plan	<p>Reports, post- construction for the first 2 years</p> <p>Reduction in bird electrocution</p> <p>Updated Biodiversity Management Plan, as applicable to the need for adaptations based on monitoring results</p>	<p>Inspection Record</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<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. 						
Cultural Heritage						
Any protection measures detailed in the Cultural Heritage Management Plan will still be in place.	ESIA	Law on Protection of Cultural Heritage, 2014 as amended	NPTG	Cultural Heritage Management Plan and Chance Finds Procedure	Cultural Heritage Management Plan and Chance Finds Procedure	Chance finds register
Soils						
Good practice with respect to storage and handling of soils, hydrocarbons and oils during maintenance work.	ESIA	Law of Soil Protection and Prevention from desertification Law on Land MNS 3236:1989. Technical Requirements for Reinforced Concrete Structures of Outdoor Distribution Facilities with a Capacity of 35-500 kW.	NPTG	O&M Plan Grievance Mechanism	Site inspections Number of grievances	Inspection records Grievance Register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Natural Hazards						
<p>A proactive maintenance regime should be adopted to ensure that potential faults are identified and repaired early.</p> <p>Vegetation e.g. around substations should be heat and fire resistant and regularly maintained to reduce the volume of flammable material near assets.</p>	ESIA	<p>MNS IEC TS 61463:2022. Bushings-Seismic qualification.</p> <p>MNS IEC 62305-4:2022. Protection against lightning. Part 4: Electrical and electronic systems within structures (IDT).</p> <p>MNS IEC 62305-2:2023. Protection against lightning – Part 2: Risk management.</p> <p>Safety Regulations for the Installation of Electrical Engineering Facilities under Annex to Ministerial Order No. A/124 dated June 2, 2025, issued by the Minister of Energy.</p> <p>Technological Work Card for Measuring Grounding Resistance of Overhead</p>	NPTG	<p>O&M Plan</p> <p>Grievance Mechanism</p>	<p>Site inspections</p> <p>Number of grievances</p>	<p>Inspection records</p> <p>Grievance Register</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
		Transmission Lines and Substations under Annex 3 to Ministerial Order No. A/194 of 2022 issued by the Minister of Energy.				
Maintenance works should be avoided during periods of high wind speed or other high risk weather events, particularly tasks that require staff to work at height.	ESIA	As above	NPTG	O&M Plan Grievance Mechanism	Site inspections Number of grievances	Inspection records Grievance Register
O&M staff should be provisioned with appropriate PPE to mitigate risks of overheating, including lightweight, breathable, and moisture-wicking fabrics. UV exposure should be limited through UV-protected clothing, shading, and sun screen, and sufficient potable water should be provided to prevent risks associated with dehydration.	ESIA	As above	NPTG	O&M Plan Grievance Mechanism	Site inspections Number of grievances	Inspection records Grievance Register
Health and safety training should be delivered to all staff prior to beginning work, and should include information on the signs of heat exhaustion and related health impacts.	ESIA	As above	NPTG	O&M Plan Training plan Grievance Mechanism	Site inspections Training plan Number of grievances	Inspection records Training records Grievance Register
A Project-specific O&M Emergency Preparedness and Response Plan should be developed and implemented by NPTG and include monitoring of weather forecast prior to works and rescheduling when necessary.	ESIA	As above	NPTG	Emergency Preparedness and Response Plan	Availability of Emergency Preparedness and Response Plan	Accidents and incidents register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Operation and Maintenance Wastes						
<p>Development and implementation of an O&M Plan that addresses waste management from maintenance activities. Waste management procedures for operation and maintenance should include:</p> <ul style="list-style-type: none"> Provision of regular training for staff on recycling and waste reduction and the practices necessary to minimise waste and facilitate good practice waste management. Provision of dedicated areas for the storage of hazardous waste arisings (including clinical waste, batteries and WEEE). Recycling of vehicle and plant maintenance waste i.e. oil or grease contaminated filters and recycling or re-use of empty chemical containers or bags. Removal of remaining hazardous waste by a specialist licensed company. MSW waste should be gathered on a regular basis and stored in closed containers until recycled or disposed of as per the local legal requirements 	ESMP	Law on waste	NPTG	Waste Management in O&M Plan	<p>Availability of O&M Plan</p> <p>Inspection of waste management at O&M sites</p>	<p>Inspection records</p> <p>Waste records</p>
Water Environment						
Suitable measures will be in place to reduce the risk of spills from maintenance vehicles, with appropriate spill kits and any refuelling if required away from the dry watercourses, wells or wetland.	ESIA	Law on Water	NPTG	O&M Plan Grievance Mechanism	<p>Site inspections</p> <p>Number of grievances</p>	<p>Inspection records</p> <p>Grievance Register</p>
Social and Community						
Project infrastructure should be adequately earthed. Signs, fencing and other barriers such as barbed wire will be employed. Measures will be taken to ensure that the general public cannot climb the towers using such barriers as anti-climb barriers or barbed wire. Appropriate warning signs as	ESIA	MNS IEC TS 61463:2022. Bushings-Seismic qualification.	NPTG	O&M Plan Grievance Mechanism	<p>Site inspections</p> <p>Number of accidents and incidents</p>	<p>Inspection records</p> <p>Appropriate signage</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
required under national legislation and international best practice will be used on the towers to warn of the risk to life.		MNS IEC 62305-4:2022. Protection against lightning. Part 4: Electrical and electronic systems within structures (IDT). MNS IEC 62305-2:2023. Protection against lightning – Part 2: Risk management.			Number of grievances	Grievance Register Accidents and incidents register
The substations will be made secure at all times and unauthorised persons will be kept away from the premises.	ESIA		NPTG	O&M Plan / Security Plan Grievance Mechanism	Availability of O&M Plan / Security Plan Site inspections Number of grievances	Inspection records Grievance Register Accidents and incidents register
Appropriate firefighting facilities will be available at the substations. Note that the use of fire within the RoW will not be permitted.	ESIA		NPTG	O&M Plan Emergency Preparedness and Response Plan	Availability of O&M Plan / Emergency Preparedness and Response Plan Site inspections	Inspection records
The NPTG should undertake a series of educational meetings with local communities and herder households in the aimag in relation to safety and the risks associated with higher voltage lines. This should include education/public outreach to inform and refresh local people's knowledge regarding restriction zone requirements.	ESIA		NPTG	Operational SEP	Availability of Operational SEP Meeting notes Evidence of communication/ exchange of information	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
The NPTG will ensure that either an operational ESMP is prepared or that the measures set out in this ESIA disclosure documents are incorporated into an existing O&M manual to reduce noise, dust and vibration locally.	ESIA		NPTG	OESMP	Availability of the OESMP.	Inspection records
The design of the Project should be such to ensure that EMF levels are within accepted guidelines for occupational and human health exposure, in accordance with national legislation and international best practice. If considered necessary (e.g. complaints), NPTG should model the levels of exposure given the boundary conditions e.g. geometry of the site and conductors, current flows. A bi-dimensional model would likely suffice. In the case of the presence of other parallel or crossing lines, or if the line is deviating from a straight line, in the vicinity of the receptor, a three-dimensional model may be required.	ESIA		NPTG	Specialist report	Availability of additional measures, if any. Number of grievances	Inspection records Grievance Register
Ongoing maintenance will be required to ensure the safety of the equipment to reduce health and safety risks.	ESIA		NPTG	O&M Plan Labour Grievance Mechanism	Availability of O&M Plan Site inspections Number of grievances	Inspection records Grievance Register
The NPTG will ensure that an operational Emergency Preparedness and Response Plan is in place and implemented; and that the relevant health services have been engaged in relation to how emergencies will be addressed, with specific attention to incidents and accidents related to high voltage lines and substation. There should be clear guidelines in terms of which hospitals locally and nationally provide such services. In the event of an emergency, such as wind damage to the OHTL that may result in the wires being reachable by the	ESIA	Law on Occupational Health and Safety, 2008	NPTG	Emergency Preparedness and Response Plan	Availability of Emergency Preparedness and Response Plan Number of accidents and incidents	Inspection records Accidents and incidents register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
public, there will be appropriate protocols in place to ensure rapid deployment of qualified staff to earth wires and rectify the damage.						
<p>The NPTG will during operation:</p> <ul style="list-style-type: none"> Develop a Discrimination and Harassment Policy Develop a stand-alone Gender Equality and GBVH Action Plan, which will include training to project employees, suppliers and Contractors on GBVH and SEAH associated risks Promote open discussions about GBVH and SEAH concerns through disclosure of gender awareness materials/training and implementation of effective Project and employee grievance mechanisms 	ESIA	<p>Labour Code, revised version, 2021</p> <p>Law on Ensuring Gender Equality, 2011</p>	NPTG	<p>Discrimination and Harassment Policy</p> <p>Gender Equality and GBVH Action Plan</p> <p>Labour Grievance Mechanism</p>	<p>Availability of policy and action plan</p> <p>Number of talks or programmes initiated</p> <p>Number of grievances</p>	<p>Inspection records</p> <p>Grievance Register</p>
Economy, Employment and Livelihoods						
<p>A Project-specific Operational HR policy and Labour Management Plan will be prepared and be readily available and understandable to all employees, and set out its approach to managing employees, including rights under Mongolian labour and employment law, and employee rights to join worker organisations and bargain collectively. Either the NPTG's existing Labour Management Plan or a Project-specific Operational Labour Management Plan should ensure that it includes:</p> <ul style="list-style-type: none"> Details of a recruitment process which is transparent and fair Details of the employment opportunities for locals Details of how employment opportunities will be advertised (such as advertisements on MoE/NPTG website) 	ESIA	Labour Code, revised version, 2021	NPTG	<p>Operational HR policy</p> <p>Operational Labour Management Plan</p> <p>Labour Grievance Mechanism</p>	<p>Availability of policy and plan</p> <p>Number of grievances</p>	<p>Inspection records</p> <p>Grievance Register</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
The MoE and NPTG should ensure effective implementation of the Energy Sector Gender Policy (2023-2032) and its Implementation Action Plan.	ESIA	Labour Code, revised version, 2021	NPTG	Gender policy/ Discrimination and Harassment Policy Labour Grievance Mechanism	Availability of gender-sensitive workplace policies Number of grievances	Inspection records Grievance Register
Where the NPTG uses external suppliers, they should comply with: <ul style="list-style-type: none"> the Discrimination and Harassment Policy The Gender Equality and GBVH Action Plan, to promote gender quality 	ESIA	Labour Code, revised version, 2021	NPTG	Supply Chain Management Plan Discrimination and Harassment Policy Gender Equality and GBVH Action Plan Labour Grievance Mechanism	Availability of policy and action plan Number of talks or programmes initiated Inspections of the supply chain Number of grievances	Inspection records Grievance Register
The MoE should work with the local developments in the area, such as the mines, to help provide for a proportion of the construction workforce to be recruited on local projects.	ESIA		MoE/PIU	Labour Management Plan	Number of local construction workers re-employed	Inspection records
Land Use, Tenure and Displacement						
Clear demarcation will be required of access routes to the OHTL to avoid multiple tracks being made during the O&M phase.	ESIA		NPTG	O&M Plan	Site observations during O&M works	Inspection records
Labour and Working Conditions						
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.	ESIA	Labour Code, revised version, 2021	NPTG	Labour Management Plan	Availability of training and resources associated with Mental Health and Wellbeing	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>A Labour Management Plan and HR policy for the O&M phase should be developed by the NPTG covering child and forced labour.</p> <p>The NPTG will ensure employees and suppliers have access to human resources policies. The NPTG will ensure that employees are aware of the HR policy and their rights to its trade union.</p> <p>Disclose the Labour Grievance Mechanism to all employees and contractors</p>	ESIA	Labour Code, revised version, 2021	NPTG	<p>Labour Management Plan</p> <p>HR policy</p> <p>Labour Grievance Mechanism</p>	<p>Availability of Labour Management Plan</p> <p>Evidence of dissemination to employees</p> <p>Number of grievances</p>	<p>Inspection records</p> <p>Grievance records</p>
Conduct Annual Labour Audits to assess operational workforce conditions, including pay, working hours, contract compliance, PPE provision, and grievance uptake.	ESIA	Labour Code, revised version, 2021	NPTG	Annual Labour Audits	Audit reports	Inspection records
<p>For gender the NPTG will:</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 Provide training to staff and suppliers on GBVH. Implement effective employee grievance mechanisms. <p>A zero-tolerance process will be in place for discrimination against female workers.</p>	ESIA	<p>Labour Code, revised version, 2021</p> <p>Law on Ensuring Gender Equality, 2011</p>	NPTG	<p>Gender Equality and GBVH Action Plan</p> <p>Labour Grievance Mechanism</p>	<p>Availability of Gender Equality and GBVH Action Plan</p> <p>Number of actions initiated</p> <p>Number of grievances</p>	<p>Inspection records</p> <p>Grievance records</p>

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<p>Develop a Supply Chain Management Plan specific to the O&M phase, and as a minimum to cover the following:</p> <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 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 Include labour management clauses (as specified in bullet point above) in procurement contracts 	ESIA	Labour Code, revised version, 2021	NPTG	<p>Supply Chain Management Plan</p> <p>Labour Grievance Mechanism</p>	<p>Availability of contracts</p> <p>Number of grievances</p>	<p>Inspection records</p> <p>Grievance records</p>
<p>In terms of OHS, it will be necessary for the NPTG to prepare and implement a detailed O&M ESMP, incorporating an OHS system and emergency preparedness and response aligned with the international standard ISO14001 and EBRD PR2 on Labour and Working Conditions. The following mitigation measures should be implemented during operation:</p> <p>The NPTG will elaborate their existing O&M Plan to cover EBRD PR2 and EBRD PR4 or, if this is not available, develop an O&M ESMP. This should include necessary provisions to ensure that the risk of exposure of the workers is assessed, managed and monitored.</p> <p>The NPTG should implement the necessary provisions to ensure that the risk of exposure of the workers, especially at the substations, will be assessed and monitored.</p> <p>The NPTG should track and report on OHS KPIs, such as:</p> <ul style="list-style-type: none"> Lost Time Injuries (LTIs) Near misses PPE compliance rates Safety training completion rates 	ESIA	<p>Law on Occupational Health and Safety, 2008</p> <p>Law on Labour Safety and Hygiene, 2008</p>	NPTG	OHS Plan	KPI records	Inspection records
<p>Prepare a detailed emergency preparedness and response aligned with the international standard ISO14001 and EBRD PR2 on Labour and Working Conditions. A medical evacuation procedure should be developed to enable injured</p>	ESIA	Law on Occupational Health and Safety, 2008	NPTG	Detailed O&M Plan / Emergency preparedness and response plan	<p>Availability of documents</p> <p>Incidents and accidents record</p>	Inspection records

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
workers to access appropriate emergency facilities. First aid facilities should also be provided at the substations. Emergency response drills shall be carried out 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 level administrations will test the functionality of evacuation procedures, communication flows, first-response capacity, and stakeholder coordination mechanisms.		Law on Labour Safety and Hygiene, 2008				Incidents and accidents register
Regular review of: <ul style="list-style-type: none"> Functional testing, commissioning, performance, testing and reliability testing of the Project. Ensure appropriate safety signage is on display within the substations and on all towers, following GIP electrical specifications and codes of practice. Ensure 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. Staff working near noisy machinery and power tools will be provided with earmuffs to protect them against noise-induced hearing loss damage. Regular maintenance of equipment to reduce the risk of injury from failing equipment. Adequate earthing of equipment to prevent shocks and malfunctioning of protection equipment. Provision of a fire detection and protection system to international standards. Regular inspection of the RoW to ensure non permitted land uses are not occurring. 	ESIA	Law on Occupational Health and Safety, 2008 Law on Labour Safety and Hygiene, 2008	NPTG	Detailed O&M Plan / Emergency preparedness and response plan Labour Grievance Mechanism	Inspections / Audits Incidents and accidents record Number of grievances	Inspection records Incidents and accidents register Grievance records
Conduct risk assessments to identify physical chemical, biological and other hazards and prioritising hazard elimination, hazard control and hazard minimisation. Risk assessments should be prepared taking consideration of	ESIA	Law on Occupational Health and Safety, 2008	NPTG	OHS Plan Labour Grievance Mechanism	Risk assessments Incidents and accidents record	Inspection records Incidents and accidents register

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
Briefing Note 01: Underground and overhead services ¹² , <i>Electric power and distribution health and safety toolkit</i> ¹³ and <i>Working near Overhead Cables</i> ¹⁴ ; and including natural hazards and remote working.		Law on Labour Safety and Hygiene, 2008			Number of grievances	Grievance records
In terms of occupational exposure to EMFs, appropriate consideration will be given to 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. Employers are required to assess all 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, an action plan should 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.	ESIA	Law on Occupational Health and Safety, 2008 Law on Labour Safety and Hygiene, 2008	NPTG	Exposure assessment procedures Where necessary, an action plan	Availability of Exposure assessments	Inspection records
Climate						
<p>The following measures should be considered:</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. 	ESIA		NPTG	O&M Plan	Observations / inspections Number of incidents and accidents	Inspection records Incidents and accidents register

¹² Available at: [How to implement our performance requirements](#)

¹³ Available at: [How to implement our performance requirements](#)

¹⁴ Available at: [Working_near_overhead_cables_En.pdf](#)

Mitigation Measure	Source	Regulation (if applicable)	Responsible Party	Management Plan (if applicable)	Verification Method / Monitoring of Compliance	Reporting Format
<ul style="list-style-type: none"> Regularly inspect and maintain drainage infrastructure to avoid water attenuation. Where possible, avoid carrying out maintenance activities during periods of extreme heat or cold, heavy rainfall / flood events, or during high wind speeds. Provide maintenance workers with appropriate PPE to mitigate risks associated with extreme heat, extreme cold, and heavy rainfall events. 						
<p>Clear and maintain non-heat or -fire resistant vegetation around substations and towers to reduce risks, with potential to replace vegetation with more resilient alternatives.</p> <p>Consider utilising windbreaks in key risk areas to reduce potential impacts associated with windblown debris.</p>	ESIA		NPTG	O&M Plan	Observations / inspections	Inspection records
<p>Staff should be provisioned with appropriate PPE to mitigate risks of weather.</p> <p>Avoid carrying out maintenance works during periods of adverse weather, particularly tasks that require staff to work at height.</p> <p>Health and safety training should be delivered to all staff prior to beginning work.</p>	ESIA	<p>Law on Occupational Health and Safety, 2008</p> <p>Law on Labour Safety and Hygiene, 2008</p>	NPTG	OHS Plan	<p>Availability of PPE</p> <p>Risk assessments</p> <p>Training plans</p>	<p>Inspection records</p> <p>Training records</p>

8 Emergency Preparedness and Response

- 8.1.1 EBRD PR 1 requires an Emergency Preparedness and Response Plan for the construction and operation and maintenance phases of a project. This allows a project, in collaboration with appropriate and relevant third parties, to be prepared to respond to accidental and emergency situations in a manner appropriate to prevent or mitigate any harm to people and/or the environment.

8.2 Emergency Preparedness and Response Plan

- 8.2.1 An Emergency Preparedness and Response Plan will be prepared in full by the Construction Contractor in advance of site works, as part of the CESMP. This Plan can then be adapted by the NPTG in collaboration with the MoE/PIU for the O&M phase.
- 8.2.2 The Emergency Preparedness and Response Plan will be developed in close collaboration and consultation with potentially affected persons and other stakeholders, such as local hospitals, and will include detailed preparation to safeguard the health and safety of workers and the communities in the event of an emergency.
- 8.2.3 The Emergency Preparedness and Response Plan will include the identification of risks where accidents and emergency situations may occur, communities and individuals that may be impacted, response procedures, provision of equipment and resources, designation of responsibilities, communication, including that with potentially affected persons and periodic training to ensure effective response. The emergency preparedness and response activities will be periodically reviewed and revised, as necessary, to reflect changing conditions.
- 8.2.4 The Emergency Preparedness and Response Plan and its procedures will be developed based on the appropriate classification of the possible incidents and its scope should include all Project sites including any temporary workers' accommodation camp(s), if provided.

9 Environmental Monitoring

9.1 Introduction

9.1.1 Through the ESMP/CESMP, the MoE/PIU and Construction Contractor will establish an Environmental and Social Monitoring Programme. Monitoring of Project activities will be undertaken in order to:

- Ensure the Project is implemented in compliance with national legal requirements and EBRD PRs;
- Monitor changes to baseline conditions during construction;
- Assess the efficiency of mitigation actions;
- Provide information on environmental and social performance to Lenders and permitting authorities as required; and
- Implement corrective actions, if required, if proposed mitigation measures are unable to eliminate/reduce potential construction related impacts.

9.2 Monitoring Plan

9.2.1 A detailed monitoring plan will be prepared by the Construction Contractor with specified targets for each indicator. It is anticipated that the following topics will be addressed (for example, through visual inspections):

- Air quality – dust deposition, including on pastureland.
- Noise – if working within 900m of herder camps/properties.
- Groundwater – water use / extraction from any permitted groundwater wells used including heavy metals testing.
- Waste – inspection between containers to monitor leaks or spills.
- Soil Quality – of excavated materials and topsoil to be re-used on site.
- Habitat cover – ensuring avoidance of impact or minimisation of impact on sensitive habitats.
- Health and Safety monitoring – e.g. use of PPE, adherence to safe working practices, etc.

9.2.2 The detailed monitoring requirements for O&M, including technical specifications and targets, will be incorporated into O&M ESMP prepared by NPTG.

9.2.3 The operation monitoring plan will include, but will not be limited, to the following:

- Biodiversity – bird specialists will undertake routine monitoring of powerlines for bird carcasses and will monitor nests on the towers.
- Exposure of the workers to EMFs, especially at the substations – within accepted national and
- Biodiversity - monitoring the effectiveness of the reinstatement measures.

9.3 Construction Checklists, Registers and Forms

9.3.1 A number of checklists, registers and forms can be used to record inspections and monitoring. These include:

- Initial Hazards and pre-construction Checklist;
- H&S and E&S Daily Site Logs;
- HSE Monthly Checklists;
- Waste Transfer Note / Hazardous Waste Consignment Note;
- Incident, Accident and Near Miss Form and Register;
- Non-Conformance Form;
- Corrective Action Form;
- Non-Conformance and Corrective Action Register;
- Chance Find Form and Register;
- Training Register and Matrix;
- Labour Grievance Form and Register;
- Stakeholder Engagement Register (see SEP); and
- Community Grievance Form and Register (see SEP).

10 Training and Awareness

- 10.1.1 A key component of the success of the ESMP depends on effective capacity building and the training of all Project employees, including sub-contractors.

10.2 Code of Conduct

- 10.2.1 A Project Code of Conduct will be prepared by the MoE/PIU. This will be applicable to all contractors, subcontractors and site visitors.

10.3 Construction Phase Training

Training Plan

- 10.3.1 ESMS training sessions will be organised in accordance with a Training Plan developed by the Construction Contractor and approved by the MoE/PIU. The Plan will outline training requirements, topics and areas of capacity building, and the staff who require on the job training. The initial training plan will be prepared and approved prior to the commencement of construction works. Training will be reviewed monthly, annually and on a needs basis.
- 10.3.2 During construction, the Construction Contractor E&S and H&S Managers will update and implement the Training Plan. Training records will be maintained for each employee, to provide evidence for auditing/inspection purposes.

Induction Training

- 10.3.3 The Construction Contractor will ensure that all workers have been inducted. All new employees will receive site induction to appraise them of CESMP aspects on site, the basic rules of work on site and the use of PPE and the prevention of injury to fellow employees.
- 10.3.4 Induction will also cover the following topics:
- ESMS Policies;
 - Project Standards;
 - Code of Conduct;
 - Environmental and social risks and impacts of Project activities;
 - CESMP; and
 - Emergency Preparedness and Response Plan.

- 10.3.5 After Induction, Project personnel will receive an Employee Handbook that contains information on employee training, emergency telephone numbers and basis CESMP requirements.
- 10.3.6 Personnel required to visit the construction site must also complete the site induction. Generic induction will consist of basic hazard awareness, safe work practices, and emergency procedures including for fire and evacuation.

Project Training

ESMS and ESMP

- 10.3.7 All those involved in the management and implementation of any aspect of the Project ESMS, Project ESMP and CESMP will be adequately trained. Training should include:
- Why the environment needs to be protected and conserved;
 - How construction activities can impact on the environment;
 - What can be done to mitigate such impacts;
 - Awareness of the ESMP/CESMP;
 - Awareness of the emergency preparedness and response plans; and
 - Social responsibility during construction e.g. being considerate to local residents.

Job-Specific

- 10.3.8 Prior to commencement of new assignments all workers will receive adequate training and information covering:
- Knowledge of materials, equipment, and tools;
 - Potential risks to health;
 - Precautions to prevent exposure to potential health risks;
 - Hygiene requirements;
 - Use of task specific PPE; and
 - Appropriate response to operational incidents and accidents.
- 10.3.9 Where necessary, training will be provided for employees carrying out specific job functions to educate and train them on topics, such as PPE use, safe driving, working in confined spaces, handling hazardous materials, etc.

Toolbox Talks

- 10.3.10 Toolbox talks will be held as necessary to address specific issues before commencing work. For specific situations, where necessary external training experts will be invited to provide technical support.



10.4 Operation and Maintenance Phase

- 10.4.1 The requirements for training during O&M will be determined by the NPTG and included in the O&M Plan.

11 Monitoring of Compliance, Auditing and Reporting

11.1 Requirements for Compliance Monitoring

11.1.1 All controls, inspections, audits and reporting will be undertaken in accordance with the Project ESMS requirements and procedures. These requirements should be reflected in the Construction Contractor's CESMP.

11.2 Inspections and Internal Audits

11.2.1 During construction, site inspection/monitoring will be undertaken by the Construction Contractor to ensure that works are being undertaken in conformance with the requirements of the Project ESMS and CESMP. These inspections will be undertaken on a daily, weekly and monthly basis by the roles identified in the CESMP, and will be recorded using Checklists, Forms and Registers. Any non-conformances will be recorded, and appropriate corrective measures undertaken by the Construction Contractor.

11.2.2 Internal audits will be conducted by the Construction Contractor E&S Manager on the CESMP to assess its effectiveness and relevance as follows:

- A full annual review:
- Following a reportable incident, or a significant non-compliance; and
- Following an addition, up-date or change order to the CESMP.

11.3 External Audit Reporting Requirements

11.3.1 During construction, the Construction Contractor will report to the MoE/PIU. The format for reporting will be agreed between the MoE/PIU and Construction contractor, however **Table 11-1** provides an overview of the ESMS reporting, responsible party and frequency of submissions. The reporting format will be reviewed at least semi-annually. Further details on contractor management are provided in **Appendix C**.

Table 11-1 ESMS Reporting Requirements

Type of Report	Report	Responsibility	Frequency	Submit To
Checklists	Inspection records	Construction Contractor E&S and H&S Managers	As required	MoE/PIU
Forms and registers	Waste management and disposal documentation	Construction Contractor E&S and H&S Managers	As required	MoE/PIU

Type of Report	Report	Responsibility	Frequency	Submit To
	Non-conformances/ Accidents/ Incidents Forms and Registers	Construction Contractor E&S and H&S Managers	As required	MoE/PIU
	Chance Finds Form	Construction Contractor E&S Manager	As required	MoE/PIU
	Community Grievance Forms and Registers	Construction Contractor E&S Manager / CLO	As required / Monthly	MoE/PIU
	Labour Grievance Forms and Registers	Construction Contractor E&S Manager / CLO	As required	MoE/PIU
Project Reports	Pre-Construction Report	Construction Contractor E&S Manager	Once	MoE/PIU
	Project Performance Report	Construction Contractor E&S and H&S Managers	Monthly or as agreed	MoE/PIU
	Post-construction Restoration Report	Construction Contractor E&S Manager	Once	MoE/PIU
	Project Performance Report to EBRD	MoE/PIU Environmental Supervisor	Monthly or as agreed	EBRD

11.4 Accidents, Incidents and Non-Conformances

- 11.4.1 During construction, the Construction Contractor will implement a Non-Conformance and Corrective Action Procedure to ensure that all non-conformances are identified and recorded, and that appropriate corrective action is taken to rectify all identified non-conformances, preventing their reoccurrence in the future.
- 11.4.2 During construction, the Construction Contractor will also implement an Accident, Incident and Near Miss Procedure to ensure that environmental incidences and health and safety incidences and accidents, including near-misses, are identified and recorded, and that appropriate corrective action is taken to prevent reoccurrence in the future.
- 11.4.3 During operation, the NPTG will follow a similar procedure, in accordance with their existing internal practices and as agreed with EBRD.

Non-Conformance Procedures

11.4.4 A non-conformance is a deviation from:

- Project policies and procedures;
- Project permits/licenses; and
- Project requirements as set out in the Project ESMP/CESMP.

11.4.5 Non-conformances may be identified through the following activities:

- Daily/weekly/monthly site inspections/monitoring, and recorded in the Checklists/Inspection records;
- Third party audit findings;
- Accidents, Incidents and Near-misses;
- Meetings notes;
- Performance reviews; and
- Grievances (internal or external).

11.4.6 Where necessary, a Corrective Action will be identified to address a Non-conformance. The Corrective Action can be a remedial action to address the immediate problem and, where necessary, further action to understand the root cause of the problem and identify further action required to address the root cause.

11.4.7 All Non-conformances and Corrective Actions will be reported in a Non-conformance and Corrective Action Form and Register.

Accident / Incident Procedures

11.4.8 All accidents and incidents (including accidents, spills, work-related illnesses, damages, near misses, etc) will be reported in the Accident and Incidences Form and Register.

11.4.9 The following procedure will be followed:

- If an accident/incident/near miss occurs, the Site Manager must be alerted immediately, and immediate action must be taken to minimise the impact or the potential impact. Depending on the nature of the accident or incident, the following will need to be employed:
 - Emergency preparedness and response plan and procedure
 - Spill emergency response procedure
- Once the immediate accident/incident/near miss has been addressed, the Site Manager must advise the H&S Manager.
- MoE/PIU should also be informed of the accident/incident, in accordance with procedures agreed within the Construction Contractor.
- The Site Manager will complete as far as possible an Accident, Incident and Near Miss Form, which will be submitted to the H&S Manager.
- The H&S Manager will review and complete the Form.

- The H&S Manager will maintain a Register of all Accidents, Incidents and Near Misses.
- The H&S Manager and Site Manager and other nominated persons as necessary, will determine what further action or investigation is required, and record this on the Accident, Incident and Near Miss Form.
- Subsequent investigation and verification activities will be undertaken by the nominated person(s) to determine the root cause(s) of the incident or accident.
- Once the cause is identified, the corrective action is to be documented in a Corrective Action Form. The Corrective Action Form will identify the corrective action required and the person responsible for delivering the action, together with an agreed timeframe for implementation. The Corrective Action Form reference number is to be added to the Accident, Incident and Near Miss Form by the H&S Manager.
- Following implementation of the corrective action, a review of the effectiveness of the corrective action will be undertaken by the H&S Manager or nominated representative.
- Where investigation indicates that the accident/incident/near miss arose as a result of a non-conformance, this will also be logged by the H&S Manager in the Non-Conformance and Corrective Action Register.
- On the successful closure of the implementation of corrective actions, the Corrective Action Form will be signed off by the H&S Manager and Site Manager, and the updated to “action closed”. The Accident, Incident and Near Miss Register and, as necessary, Non-Conformance and Corrective Action Register will be updated by the H&S Manager.

11.4.10 For any serious accidents or incidents, the Construction Contractor will complete an Accident Report within two weeks for submission to the MoE/PIU.

12 Implementation Schedule

12.1.1 Table 12-1 Table 12-1 provides a summary of the main actions and implementation schedule for the development of the ESMP by the MoE/PIU, Construction Contractor and NPTG.

Table 12-1 Summary of Main Actions for Implementation

Action	Responsibility	Time
Set up PIU and staff	MoE	Prior to construction
Develop and implement an integrated Project ESMS. This will include: <ul style="list-style-type: none"> • Policies • ESMP • Legal and permit register • SEP • LARF • Roles and roles and responsibilities (including clear management of interfaces) • Project schedule/programme 	MoE/PIU	Prior to construction
Develop Project SEP.	MoE/PIU	Prior to construction
Commission a specialist Mongolian organisation to undertake archaeological and paleontological surveys (and potentially also an ethnographical study, where they are considered necessary) in line with Mongolian law relating to land use and cultural heritage.	MoE/PIU	Prior to construction
Confirm final routing and location of towers.	MoE/PIU/ Construction Contractor	Prior to construction
Undertake pre-commencement survey related to final routing/alignment.	MoE/PIU/ Construction Contractor	Prior to construction
Develop RAP/LRP, if required	MoE/PIU	Prior to construction
Implement Project SEP	MoE/PIU	Prior to and during construction
Develop CESMP, including individual plans e.g. Water Management Plan, Emergency Preparedness and Response Plan	Construction Contractor	Prior to construction
Develop Training Plan	Construction Contractor	Prior to construction
Identify E&S Manager and H&S Manager and team	Construction Contractor	Prior to construction

Action	Responsibility	Time
Undertake E&S screening of proposed sites for temporary use e.g. construction compounds, workers' camp, etc.	Construction Contractor	Prior to construction
Provide RAP/LRP, if required, for the above.	Construction Contractor	Prior to construction
Undertake pre-construction baseline survey (photos and conditions) and prepare pre-construction report	Construction Contractor	Prior to construction
Prepare CSEP	Construction Contractor	Prior to construction
Maintain permit register and obtain permits	Construction Contractor	Prior to construction
Implement CESMP	Construction Contractor	During construction
Implement CSEP	Construction Contractor	Prior to and during construction
Implement Training Plan	Construction Contractor	Prior to and during construction
Inspections and monitoring	Construction Contractor	During construction
Site inspections / audits	PIU/Supervision Engineer	During construction
Construction performance reporting	Construction Contractor to MoE/PIU	During construction
	MoE/PIU to EBRD	During construction
Post-construction Rehabilitation and Reinstatement Report	Construction Contractor	Post-construction and prior to handover
Develop Project O&M Plan	NPTG	Prior to operation
Implement Project SEP	NPTG	During operation
Implement Training Plan	NPTG	During operation
Implement Project O&M Plan	NPTG	During operation
O&M performance reporting	NPTG to EBRD	During operation

Route Corridor and Infrastructure/Land Crossed

Appendix A

Route Corridor and Infrastructure/Land Crossed

108°30'0"E				109°0'0"E			
Intersection number	Intersecting facilities and strucrures	Organization name	Towers corresponding to the intersection	Legal status of land rights (possession or use)*			
1	Mining industry structures and facilities	MAK	1-3	15. Land parcel with unit number 4414003347, with possession rights			
2	Communication and information transmission lines	"Mobicom Corporation" LLC	13-14	13. Land parcel with unit area number 4414003130, with the right to use			
3	Explosive's magazine	Blast LLC	14-15	14. Land parcel with unit number 4414003271, with possession rights			
4	Communication and information transmission lines	"Mobicom Corporation" LLC	36-37	13. Land parcel with unit number 4414003130, right to use			
5	35kV 2-circuit OTL	Mongolian Railway SOJSC	54-55	Information on land tenure/use rights is not available in the database provided by the GNCC.			
6	Communication and information transmission lines	"Mobicom Corporation" LLC	57-58	13. Land parcel with the unit number 4414003130 to use right			
7	Fiber optic cable	Mongolian Railway SOJSC	57-58	Information regarding the right to possess/use land is not available in the database provided by the Land Administration and Geodesy Agency.			
8	Dirt road	Mandakh soum governor's office	77-78				
9	35kV OTL Tsagaan Suvarga-Mandah	BSERPDG SOJSC	99-100				
10	Dirt road	Mandakh soum governor's office	125-126				
11	Dirt road	Mandakh soum governor's office	133-134				
12	Dirt road	Mandakh soum governor's office	134-135				
13	Industrial and Technological Park Authority	Erdenes Tsagaan Suvarga LLC	134-136				
14	Dirt road	Mandakh soum governor's office	146-147				
15	Dirt road	Mandakh soum governor's office	146-147				
16	Fiber optic cable	Mongolian Railway SOJSC	210-211				
17	Railway	Mongolian Railway SOJSC	210-211	12. Land parcel with land possession rights number 4414003357 Information regarding the right to possess/use land is not available in the database provided by the Land Administration and Geodesy Agency.			
18	Fiber optic cable	Mongolian Railway SOJSC	210-211				
19	35kV OTL Tsagaan Suvarga-Khatanbulag	BSERPDG SOJSC	212-213	11. Land parcel with land possession rights number 4410088109 10. Land parcel with unit area number 4410086038, with the right to use			
20	Power transmission line	COAL LLC	628-630				
21	10kV OTL Railway Power Supply	UB Railway Joint Venture	640-641	9. Land parcel with unit number 4410092655, which is in the name of the Ministry of Roads and Transport, with land possession rights Information regarding the right to possess/use land is not available in the database provided by the Land Administration and Geodesy Agency.			
22	Railway	UB Railway Joint Venture	640-641				
23	Communication line	UB Railway Joint Venture	640-641	8. Land parcel with land possession rights number 4410092655, which is in the name of the Ministry of Roads and Transport, with land possession rights Information regarding the right to possess/use land is not available in the database provided by the Land Administration and Geodesy Agency.			
24	Paved road	Dornogovi Aimag governor's office	645-646				
25	10kV OTL	BSERPDG SOJSC	651-652	7. Land parcel with land possession rights number 4410092167 7. Land parcel with land possession rights number 4410091656			
26	110kV OTL between Sainshand-Ail Bayan	NPTG SOJSC	655-656				
27	2 circuits of 35kV OTL between Sainshand-Zuun Bayan	NPTG SOJSC	655-656	Information regarding the right to possess/use land is not available in the database provided by the Land Administration and Geodesy Agency.			
28	Communication and information transmission lines	Information and communication network SOJSC Central Branch	666-667				
29	Communication and information transmission lines	Skynetworks LLC Dornogovi aimag branch	666-667	6. Land parcel with land possession rights number 4410092164 5. Land parcel with unit number 4410092656, possession right held by the Ministry of Roads and Transport 4. Land with unit number 4410092999, with possession rights			
30	110kV OHTL	NPTG SOJSC	670-671				
31	Communication and information transmission lines	MT Networks LLC	670-671	3. Land parcel with land use right number 4410081967 Information regarding the right to possess/use land is not available in the database provided by the Land Administration and Geodesy Agency.			
32	Paved road	Dornogovi Aimag governor's office	672-673				
33	Commercial and public service facilities, centers, and complexes	Citizen Saruulbuyan N.	672-673	2. Land parcel with unit number 4410051193, with possession right 1. Land parcel with unit area number 4410082902, with the right to use			
34	35kV OTL	BSERPDG SOJSC	673-674				
35	Fiber optic cable	MX SOJSC	674-675	Information regarding the right to possess/use land is not available in the database provided by the Land Administration and Geodesy Agency.			
36	110kV OTL Sainshand-Zamlin Uud	NPTG SOJSC	674-675				
37	Fiber optic cable	MX SOJSC	675-676	3. Land parcel with land use right number 4410081967 Information regarding the right to possess/use land is not available in the database provided by the Land Administration and Geodesy Agency.			
38	Fiber optic cable	MX SOJSC	676-677				
39	Railway	UB Railway Joint Venture	678-679	2. Land parcel with unit number 4410051193, with possession right 1. Land parcel with unit area number 4410082902, with the right to use			
40	10kV OTL Railway Power Supply	UB Railway Joint Venture	678-679				
41	Communication line	UB Railway Joint Venture	678-679	Information regarding the right to possess/use land is not available in the database provided by the Land Administration and Geodesy Agency.			
42	110kV 2-circuit OTL Wind farm	NPTG SOJSC	684-685				
43	Paved road	Sainshand wind farm	684-685	2. Land parcel with unit number 4410051193, with possession right 1. Land parcel with unit area number 4410082902, with the right to use			
44	Communication and information transmission lines	Sainshand wind farm	684-685				
45	Mining license area	Mongolin Alt (MAK) LLC	1-3	MV-17541. Mining license number MV-17541 for the Tumen Uzii Uul/Tsagaan Suvarga area*** XV-20392. Exploration license number XV-20392 for the Dovtsog khudag area*** XV-19543. Exploration license number XV-19543 for the Tsagaan Tsaviin Hudag area*** XV-19251. Exploration license number XV-19251 for the Ungutarea***			
46	Exploration license area	Ochir Undraa LLC	15-34				
47	Exploration license area	Javkhant Bold Mining LLC	517-521				
48	Exploration license area	MGL Geo Khuder LLC	521-569				

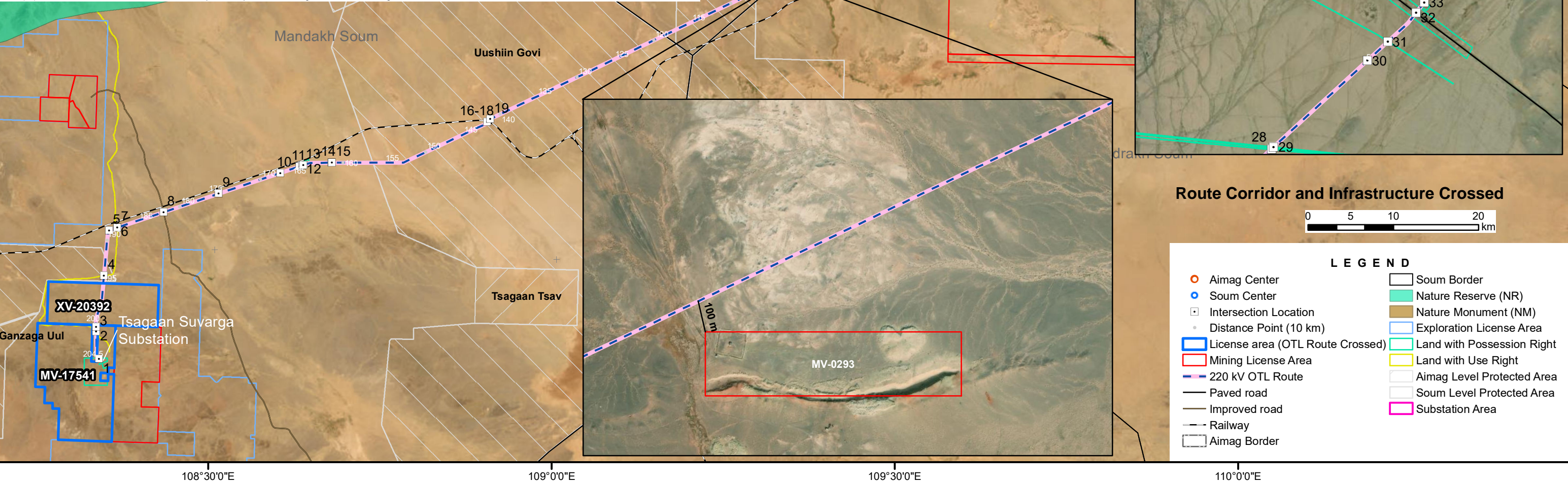
Source:

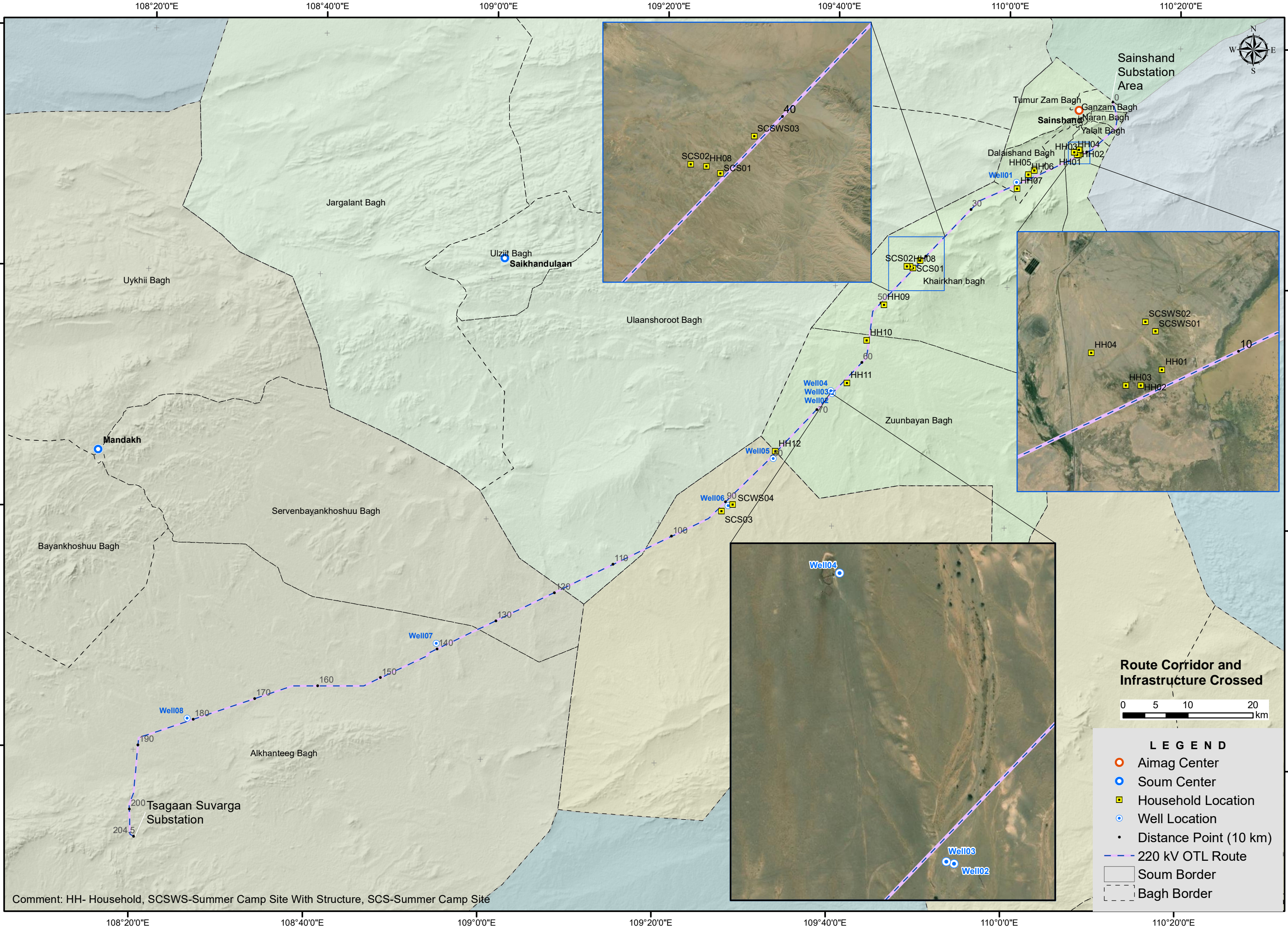
* SSTS OHTL Design document. Master Point LLC, Volume 2, Page 239, 2021

** Based on information received from the General Authority for Land Administration, Geodesy and Cartography. Land parcels with possession or use rights. 9 July, 2025

*** Based on information received from the Mineral Resources and Petroleum Authority. 7 July,2025

Note: (1.) The numbers marked in bold are the numbers of 15 land parcels with possession and use rights, which were checked against the SSTS OHTL route based on information received from the GALAGC.





Appendix B

Environmental and Social Screening Guideline

Introduction

This E&S screening guideline should be followed for all temporary sites and Associated Facilities to be selected by the Contractor. Approval of sites will be required on the basis of this Guideline.

Temporary sites include haul roads, workers' accommodation sites and any lay down and working areas.

Associated facilities are defined in the EBRD Environmental and Social Policy as *“facilities or activities that are not financed by EBRD as part of the project but which in the view of EBRD are significant in determining the success of the project or in producing agreed project outcomes. These are new facilities or activities: (i) without which the project would not be viable, and (ii) would not be constructed, expanded, carried out or planned to be constructed or carried out if the project did not exist.”* Associated facilities will include borrow pits and quarries.

General Principles

The following criteria and principles will apply in the selection of sites:

- Avoid involuntary or voluntary resettlement of communities or individuals and minimise economic displacement and impacts on livelihoods;
- Apply minimum practical distances from human receptors that could be potentially affected by an increase in dust and particulate matter. A minimum distance of 1km from construction activities should be adopted where practical;
- Avoid ecologically valuable areas;
- Avoid areas in the vicinity of dry/full rivers);
- Avoid natural drainage patterns (distance >25 m);
- Avoid public infrastructure;
- Avoid herder camps and key grazing areas;
- Avoid areas affecting cultural heritage assets, directly or by impeding the access to the sites by the affected communities; and
- Avoid sites identified as important for historical or archaeological reasons or for their current significance in local culture and traditions.

Control Measures

Pre-construction

The following measures will be employed by the Contractor:

- An inventory of temporary sites and Ancillary Facilities and the identification of their footprints will be identified;
- An E&S screening, including a walkover survey, will be carried out;
- Where necessary (i.e. as triggered by the screening exercise), additional surveys undertaken e.g. ecology survey;
- An E&S screening report will be prepared following the site walkover; and
- The report(s) will be submitted to the MoE and EBRD for approval.

The E&S screening will cover the following:

Environmental and Social Screening Guideline

PROJECT SITE:		
Date:		Attendees:
Ref.	SITE DETAILS	
1	Site Description	
2	Approximate site dimensions	
3	Access roads and points <i>Note restrictions on height, width and weight</i>	
4	Presence of buildings or structures <i>Number and type of structures</i>	
5	Topography, Surfaces and condition <i>e.g. hardstanding / landscaped</i>	
6	Site Drainage <i>Any water courses, standing water, man made drainage on site?</i>	
7	Groundwater sources in the area	
8	Overhead cables/pylons	
9	Soil type and contamination on site	
10	Cultural heritage / Archaeology	
11	Quarries/Borrow pits <i>Is the site new or existing?</i>	
SURROUNDING LAND USES		
Brief description of surrounding land uses		
Include sensitive receptors (consider: Human Beings, Flora and Fauna, Air and Climate, Landscape and Visual Amenity, Water, Land Use, Cultural Heritage, Archaeology and Material Assets, Traffic and Transport, Soil, Geology and Hydrogeology)		
11	North	
12	South	
13	East	
14	West	

Environmental and Social Screening Guideline

DETAILS OF KEY SENSITIVITIES						
Ref	Environmental Issue	Yes	No	Un-known	Description / Potential Impact	Location and distance from proposed site
1	Community and Socio Economics					
	- Settlements, individual houses – type, density, etc					
	- Sensitive receptors e.g. hospital, clinic, school					
	- Businesses					
	- Industry / factories					
	- Leisure facilities e.g. football pitch					
	- Other					
2	Land use					
	- Town / properties adjacent the site					
	- Agricultural resources adjacent to the site					
	- Forestry resources adjacent to the site					
3	Topography and Soils					
	- Topography e.g., flat, undulating, hills, low-lying, ridges					
	- Types of soil e.g. fragile, unstable (photo to show colour)					
4	Flora and fauna					
	- Site located in or near a protected area?					
	- Vegetation type and cover					
	- Are protected species located on site?					
	- Wildlife seen during site visit? e.g., birds, terrestrial and aquatic (evidence of fishing)					
5	Archaeology and Cultural Heritage					
	- Any buildings, bridges, or man-made or natural features identified as of cultural importance					
6	Air Quality and Noise and Vibration					
	- Road surface/soil cover i.e. potential for dust generation					
	- Any AQ or noise emitting sources in the immediate vicinity of the site?					
7	Landscape and visual					
	- Predominant immediate landscape features?					
	- Site visible from key receptors?					
8	Surface and Groundwater					

	- Surface or groundwater resources identified (e.g. streams, ponds, culverts, village pumps)					
9	Miscellaneous Issues - Any other issues not included above (e.g. safety/security concerns)					

Resettlement Action Plan / Livelihoods Restoration Plan

If involuntary displacement is unavoidable, the Project will be executed in line with the LARF to ensure compliance with EBRD PR5. A Resettlement Action Plan and/or Livelihoods Restoration Plan will be prepared, as appropriate to the nature of the displacement. These plans will cover:

- Identification of displacement impacts;
- Details of census and asset surveys and consultation undertaken;
- Compensation plan; and
- Budget and implementation plan.

Evidence will be collected that all compensation plans have been agreed and disbursed prior to construction on site.

Entitlements and eligibility will be assessed in accordance with the matrix provided in the LARF.

Permits and Agreements

As necessary, the relevant permits will be obtained for the sites. Where agreements are required with utility owners, these shall be obtained. Any working practices required by said utility owners should be incorporated into the CESMP.

Construction

The Contractor's detailed CESMP will need to cover any additional measures to mitigation adverse impacts at temporary sites and ancillary facilities. Control measures during construction will be employed in line with the Contractor's detailed CESMP.

Reinstatement measures

All sites and areas disturbed by temporary works / Associated Facilities will be restored to as near its original ground profile and vegetative state as possible. Reinstatement will be undertaken in line with the Contractor's detailed construction ESMP.

A site-specific Site Restoration and Reinstatement Report will be prepared by the Contractor in accordance with the ESMP.

Reporting

Records will be kept of:

- Pre-construction E&S screening checklist and report
- Pre-construction Topic-specific Survey Report(s), where required e.g. ecology
- Site Restoration and Reinstatement Report

Appendix C

Contractor Management

Contractor Selection

A process for selection of the Construction Contractor (or Contractors) and suppliers will be implemented. The MoE/PIU will use the EBRD's Standard Procurement Documents (or equivalent) for solicitations and contracts, which includes labour and occupational, health and safety requirements.

The process will identify and assess the compliance of the Construction Contractor's existing environmental, social health and safety (ESHS) and labour management practices against the Project's policies and standards, including their ability to provide all required work and materials/services in compliance with the specified standards.

Prequalification

Prequalification will include a request for information that provides useful indicators of the Contractors' understanding, and previous experience, of managing ESHS matters generally. It will also obtain information on their capacity to manage ESHS matters, including existing and potential issues specific to the Project.

Solicitation

The MoE/PIU will include the following information within the Request for Proposal documents (RFP), to inform prospective Contractors:

- The project-specific environmental and social requirements outlined in this ESMP, together with the ESAP, LARF and SEP and, where available Resettlement Action Plan (RAP)/Livelihoods Action Plan (LRP).
- MoE's corporate policies and procedures including the Project-developed ESMS, Environmental Health and Safety Policy, Human Resources Policy and Procedures, Discrimination and Harassment Policy, Gender Equality and Gender Based Violence and Harassment (GBVH) Action Plan, and the Labour Management Procedure.

Prospective Contractors will need to provide a commitment that they will be responsible for the environmental and social performance of their sub-contractors and suppliers.

Contractor Review

The MoE/PIU will review the information provided by potential Contractors and suppliers, as part of the process to select the Contractor such as:

- Past ESHS performance;
- Status of their existing Environmental and Social Management System (ESMS);
- Human Resource (HR) policies, codes of conduct, grievance mechanism controls, including means to address harassment and other forms of GBVH plus prior reported incidents of Sexual Exploitation and Abuse and Harassment (SEAH) and GBVH;
- Supply chain management criteria;
- Information in public records, for example, corporate registers and public documents relating to violations of applicable labour laws;
- Business licenses, registrations, permits, and approvals;
- Documents relating to a labour management system;
- Confirmation that suitable experts in can be supplied as per the Contractor roles set out in Section 3 of this ESMP;
- Workers' certifications/permits/training to perform required work;
- Records of safety and health violations, and responses;

Contractor Management

- Accident and fatality records and notifications to authorities;
- Records of legally required worker benefits and proof of workers' enrolment in the related programmes;
- Worker payroll records, including hours worked and pay received;
- Identification of safety committee members and records of meetings; and
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting PR2: Labour and working conditions.

The exact requirements will be communicated to bidders during the procurement process and the selection process will be documented, and records will be kept.

Contracting

The draft contract will include project specific conditions relevant to ESHS performance. In order for Contractors to implement the ESHS requirements specified within the ESAP, ESMP, LARF (RAP/LRP) and SEP, the contract will include direct references to these documents. These documents and associated documentation that must be prepared, or elaborated, and implemented by the Contractor will be listed in the environmental and social conditions of the contract. These documents shall be submitted for MoE/PIU review and approval within an agreed timeline relative to the Project Schedule, Contractor mobilisation, and commencement of work.

An organisation chart illustrating reporting lines for ESHS personnel of both the Contractor and their sub-contractors in relation to MoE is a key aspect of the contract negotiations and must be included with the contract documentation. This organisation chart must align with the roles and responsibilities in Section 3 of this ESMP.

The ESHS professionals in the PIU will review the contract to assess any general ESHS requirements present. The ESHS professionals in the PIU will review the contract to assess any general ESHS requirements present.

The contract shall include general and project-specific requirements for the following:

- The elaboration of the ESMP to develop and implement the CESMP and sub-plans, as well as applicable sections of other plans including the ESAP, SEP, LARF (RAP/LRP);
- The number of and qualifications that the environment, social, health and safety personnel are required to have, including those roles detailed in Section 3 of this ESMP;
- The nature, risks, and complexity of the Project including the scope of work of the service being contracted;
- The contract will list the plans and sub-plans the Contractor is to develop for MoE approval and the plans that may have been prepared by MoE/PIU for contractor implementation;
- Explicit commitment to compliance with the Project commitments as captured in the ESMP, ESAP, SEP, LARF (RAP/LRP) and the legislation (set out in Appendix D of this ESMP) and acquisition of all required permits, licenses, consents, and approvals prior to undertaking the activities being permitted or otherwise approved;
- Specific reference to the Lenders policy requirements and other international guidelines (as outlined in Appendix D of this ESMP);
- The implementation of training requirements as set out in the Training Plan, as required in the ESMP;
- The Contractor's monitoring of the ESHS performance of their construction workers and sub-contractors, as required in the ESMP.
- The monitoring of ESHS parameters, as detailed in the ESMP, that contractor is required to carry out;
- The implementation of the grievance mechanism for construction workers (including sub-contracted workers);
- It will elaborate the Project grievance mechanism in the SEP, including reporting on grievances and how they are addressed between the contractor and the MoE/PIU;

Contractor Management

- Assurance that the MoE's project-level grievance mechanism for external stakeholders, as set out in the SEP, will be adopted by the Contractor, and sub-contractors, and there is clear communication to stakeholders on how to address grievances related to the activities of contractors, including both works on the Project site(s) and in any ancillary facilities and infrastructure;
- Creation and maintenance of records on ESHS performance, and reporting requirements, as required in the ESMP;
- The environmental conditions under which the Contractor will be allowed to demobilize and leave the site, including conditions of site restoration and requirements for handling personnel retrenchment, particularly those involving local workers, as required in the ESMP;
- A clear statement in the contract that says the Contractor is responsible for the ESHS performance of sub-contractors and suppliers and shall consider EHSS aspects in sub-contractor and supplier selection;
- A clear statement in the contract that says that on the Contractor's failure to meet the ESHS requirements in such a way as to prevent significant impacts to workers, local communities and/or individuals, and/or environmental resources, and on the Contractor's failure to correct such deficiencies upon receiving proper notice, MoE has the right to appoint and pay another party to repair damages or otherwise remedy the impacts and reduce payment to the Contractor in the amount paid to the third party;
- The specific mitigation measures to control ESHS impacts during construction work are to be considered as part of the works themselves, not measures that are needed in addition to the main works.

Proposal Evaluation

The evaluation criteria will be established alongside the bid packages including ESHS aspects. The team evaluating proposals will include health, safety, environment, social professionals from the PIU to evaluate bidders' health, safety, environment and social qualifications.

Work Authorisation

The MoE will only allow the Contractor entry to site following verification that the CESMP and all relevant sub-plans are in place. The Contractor will need to demonstrate that temporary land access has been secured and the associated LARF provisions and protocols have all been implemented for specific working areas. These measures will need to be approved by the PIU before an Authorisation to commence work and a Work Permit can be issued.

The Contractors must receive a Work Permit before billing any time and/or materials. This permit will authorise the start of work, will identify the deliverable(s), will identify budget and schedule constraints, will identify the responsible manager, and will identify the reviewers and acceptors of the products or services. When the authorised work is complete, the Work Permit Form will be closed, and the authorisation withdrawn.

Point of Contact

Each Contractor will have a single point of contact with the MoE for contractual issues.

Kick-Off Meeting and Site Induction

Prior to early work activities, the MoE will hold a kick-off meeting with the Contractor and major sub-contractors, prior to arrival at the site. The purpose of this meeting will be to review planned activities and the Project Schedule, review ESHS requirements, review the roles of the various parties in implementing and monitoring mitigation measures, and agree on Project-specific induction and training content.

The kick-off meeting will include a discussion about control of access to the site, how to best coordinate the security management system, and management of ESHS activities at both the main construction compounds (including Worker's accommodation) and any other construction sites. The PIU's Environmental Supervisor, Health and Safety Specialist and Social Specialist and the Contractor's Project Manager, E&S Manager and H&S Manager should be present to reiterate all environmental and social commitments and establish initial compliance points and coordination requirements during site establishment.

Contractor Management

Site Visits

The Supervision Engineer will visit the site daily during the first weeks of construction activities to guide the Contractor's Project Manager, E&S Manager and H&S Manager in overseeing activities and ensuring that there are common expectations on ESHS performance. Site visits will continue for the duration of the activity to ensure adequate supervision, proactive monitoring, and sound ESHS performance, using different approaches and varying the times of sites visits, such as inspections, and audits as defined in MoE's ESMS. The Contractor will make all the necessary arrangements for proper communication during these site visits and will accompany PIU ESHS personnel, when required.

Progress Reporting

The Contractor will be aware of the overall progress of the Project. This includes the progress of each sub-contractor. The Contractor will report progress to the Supervision Contract Manager on a weekly basis in a format that will be agreed with MoE's PIU. The Contractor will also be required to provide ESHS updates for inclusion in the monthly Project Progress Report prepared by the Supervision Consultant, and approved by the PIU, for the Project Lender.

The Contractor will prepare and deliver a Project Execution Plan before the commencement of the works, in which all aspects of the Project will be explained, including the management of ESHS aspects. This plan will present the monitoring reporting structure, and content, as weekly and monthly, which will be approved by PIU.

The Contractor will be required to monitor and maintain records on ESHS performance, as set out in the ESMP. The Contractor will prepare and deliver weekly progress reports on ESHS performance. The reported ESHS information will include, but not be limited to, the following:

- Safety hours worked, recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and corrective, remedial and preventive activities that have been undertaken;
- Environmental incidents and near misses and investigation findings;
- Health and Safety incidents involving injury and accidents involving fatality;
- ESHS requirements (non-compliance incidents with permits and national law (legal noncompliance), project commitments, or other health, safety, social and environmental requirements);
- Details of any ESHS inspections and audits by Contractor, engineer, or others, including authorities (to include date, inspector or auditor name, sites visited, and records reviewed, major findings, and actions taken.);
- Personnel (number of workers, indication of origin (expatriate, local, non-local nationals), gender, and skill level (unskilled, skilled, supervisory, professional, management);
- EHSS staffing (new hires and departures and listing of current staff and titles);
- Training, including any toolbox talks, on ESHSS issues (including dates, number of trainees, and topics covered);
- Construction footprint management, details of any work outside the expropriation boundary or major off-site impacts caused by ongoing construction (to include date, location, impacts, and actions taken);
- External stakeholder engagement (any formal or informal meetings, and information disclosure and dissemination include a breakdown of women and men consulted and themes coming from various stakeholder groups, including vulnerable groups);
- Details of any security risks;
- Worker grievances (details including occurrence date; grievance; and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken);
- External stakeholder grievances (details including occurrence date; grievance; and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken), grievance data should be gender disaggregated. Particular sensitivity may be needed around SEA or GBVH issues raised;

Contractor Management

- Major changes to the CESMP, sub-plans or other ESHS practices;
- Project changes and ESHS implications;
- Deficiency and performance management (actions taken in response to previous notices of deficiency or observations regarding ESHS performance and/or plans for actions to be taken, these should continue to be reported until MoE determines the issue is resolved satisfactorily);
- Performance against KPIs;
- A textual description of progress; and
- A list of internal milestones attained.

Progress Reviews

On an as-needed basis, the MoE may request an informal review of Contractor's progress. This will involve discussions with the Contractor's Project Manager or the Contractor's/sub-contractor's point of contact for contractual matters. These reviews will be held at the request of the PIU Manager.

Labour Grievance Mechanism

The Contractor will be responsible for their own workforce grievance mechanism process. The Contractor's E&S Manager and Human Resources Lead will be responsible for addressing and managing grievances raised by workers and regularly communicating these to the MoE. The Contractor's labour management records will include records relating to workforce grievances received and their resolution.

Construction Workers' Accommodation

The Contractor will be responsible for the development and implementation of a Construction Worker's Accommodation Management Plan as set out in the ESMP, if required. This will be informed by the completion of a Construction Workers' Accommodation Checklist, as set out in Appendix I of this ESMP.

Code of Conduct

The Contractor will develop and implement a Construction Workers' Code of Conduct. The Contractor will also submit the Code of Conduct to the Supervision Consultant for review and approval. The Code of Conduct will reflect MoE core values and overall working culture, including the prohibition of any type of harassment and the requirements of EBRD's PR2.

Milestone Reviews

At key contractual milestones, a formal review will be conducted to provide visibility into the direction of the Project to all parties.

Non-compliance

At any stage of construction or other work, if the Contractor has not taken appropriate action to achieve compliance with health, safety, social and environmental requirements after repeated notices of violation and warnings of non-compliance, and significant ESHS impacts are occurring or imminent, the MoE shall order the Contractor to stop work until ESHS performance is brought under control and up to acceptable standards.

Demobilisation and Site Handover

The Environmental Supervisor, Health and Safety Specialist and Social Specialist shall inspect all work sites and other areas affected by the Contractor, when notified that construction is complete, to determine if the requirements established in the contract have been met. The MoE will allow the Contractor to demobilise equipment and personnel only after MoE personnel determine that the ESHS requirements have been fully met. Issues that have arisen during the contract should be reviewed carefully during the handover review and acceptance by the MoE, including the possibility of the issues arising in the future.

Contractor Management

To ensure that all the necessary ESHS provisions have been duly met and that the appropriate controls and requirements were implemented, the MoE will develop a checklist including all relevant ESHS aspects that need to be verified upon completion of work. If there are pending topics or requirements, these will be communicated to the Contractor, who must address them in accordance with an agreed schedule.

Required policies, procedures, and guidelines for operations should include lessons learned from construction, as well as ESAP and ESMP commitments.

Appendix D

Relevant Legislation and Lender Requirements

National Requirements

The key Mongolian Environmental and Social Laws are summarised in table below:

Name of the Law	Summary description	Year Adopted	Year of Amendment
The Constitution of Mongolia	The constitution established a representative democracy in Mongolia, enshrining core functions of the government, including the separation of powers and election cycle, and guaranteeing human rights including freedom of religion, travel, expression, private property. In 2019, Mongolia amended its constitution to enhance the economic opportunities of the Mongolian citizenry and give them better control over how the country's vast natural resources and the revenues earned from them are maintained.	1992	1999, 2019, 2022, 2023
Civil Code	This law regulates the relationships related to both material and non-material wealth that arise between legal persons. The civil legislation governing these relationships is founded on several key principles: the equality and autonomy of participants in civil legal relations, the sanctity of their property, freedom of contract, non-interference in personal affairs, the free exercise of civil rights and obligations, and the reinstatement and protection of violated rights through the court system.	2022	Latest amendments 2021, 2021, 2023, 2024
Law on Environmental Protection	<p>The Law on Environmental Protection was adopted on March 30, 1995, and last amended in 2024. It aims to regulate relations between the State, citizens, business entities, and organizations to guarantee the human right to live in a healthy and safe environment, ensure ecologically balanced social and economic development, protect the environment for present and future generations, promote the proper use of natural resources, and restore available resources.</p> <p>The law established a responsibility mechanism that requires that a party found guilty is liable to compensate for environmental negative impact and cost of restoration of the natural resource due to its operation and it also states that an officer who did not perform his/her duties is liable. Furthermore, any industry, economic entity and organization is required to commission an environmental assessor to conduct an environmental audit and can issue a fine as compensation for damage caused to the environment.</p> <p>With regards to ownership of natural resources and environmental protection, business entities and organizations may use natural resources upon the payment and collection of relevant fees in accordance with any contract, special permit, or license (Article 6.2).</p> <p>Environmental audit shall be conducted every two years, and the economic entity shall implement recommended measures in environment audit report and shall submit the report about its implementation to province Environment Agency within the term stated in audit report (Article 10.1).</p>	2012 (revised version)	2015, 2017, 2022, 2023, 2024

Relevant Legislation and Lender Requirements

Name of the Law	Summary description	Year Adopted	Year of Amendment
Law on Environmental Impact Assessment	The Law on Environmental Impact Assessment was adopted on May 17, 2012, and last amended in 2024. The purpose of this law is to implement Article 16.2 of the Constitutional Law of Mongolia, protect the environment, prevent ecological imbalance caused by human activities, exploit mineral resources with minimal adverse impact on the environment within the region and industry, assess the environmental impact of development policies, plans, programs, and projects, and make decisions and conclusions on whether to implement them. It also aims to arrange coordination among stakeholders.	2012	2024
Law on Sub-Soil	<p>The Law of Mongolia on Subsoil is designed to regulate the use and protection of subsoil resources, ensuring they benefit both present and future generations. It establishes that the subsoil is state property, aligning with the Constitution of Mongolia, and prohibits any alteration of this ownership. The legislation includes the constitution, the Law of Mongolia on Subsoil, and other relevant legislative acts, with international treaties taking precedence if there are conflicts.</p> <p>Subsoil is defined as the space extending below the soil surface, encompassing all materials and geological objects found within this depth. Regardless of its usage, all subsoil forms a unified pool owned by the state. This comprehensive legislation aims to regulate the exploitation and conservation of these vital natural resources effectively.</p> <p>Business entities, organizations and individuals have the right to mine ordinary minerals and use fresh groundwater for their own business and domestic needs without obtaining the mine tenure and based on the permission of the soum or district governor (Article 18).</p> <p>Basic rights and obligations of subsoil users (Article 20):</p> <ul style="list-style-type: none"> • 3) reliable protection of atmospheric air, land, forests, water, mineral springs, animals, other environmental objects and structures from potential harmful effects of subsoil use, as well as preservation and protection of special protected areas, natural and historical and cultural monuments, • 4) to make the land disturbed during the subsoil use safe and rehabilitate it so that it can be used in the future and hand it over to the local administrative body that first issued the permit, • 5) to hand over precious metals, precious stones and scientific, historical and cultural values to the state that were discovered during subsoil use." 	1988	2023
Law on Soil protection and prevention from desertification	<p>The Law on Soil Protection and Prevention of Desertification was adopted on May 17, 2012 and last amended in 2022. The purpose of this law is to regulate relations concerning the protection of soil from degradation, restoration, and the prevention of desertification.</p> <p>The law establishes the following measures to implement in order to prevent and mitigate impacts on soil:</p>	2012	2022

Relevant Legislation and Lender Requirements

Name of the Law	Summary description	Year Adopted	Year of Amendment
	<ul style="list-style-type: none"> • The category of the state of soil degradation and desertification should be determined, and appropriate measures should be taken. • Waste generated from the Project activities should only be disposed at the approved disposal site (Article 7.2.1). • No less than 10% of the tenure land should be planted with trees and grasses (Article 7.2.4). • Vehicle road and parking lot area should be defined, and transport means should not create traffic in other places other than these designated areas (Article 7.2.5). • If the Project operations/activities have led to soil degradation, the responsible for the Project shall pay for the cost of estimating the amount of damages imposed (Article 11.4) and it has duty of eliminating and rehabilitating these damages (Article 9.3). 		
Law on Special Protected Areas	<p>The purpose of this legislation is to regulate the utilization and designation of areas under special protection, ensuring the preservation and protection of natural landscapes in Mongolia. The law aims to maintain unique features of natural zones, protect rare and endangered fauna and flora, safeguard historical and cultural sites, and conserve natural sightseeing locations.</p> <p>The law classifies state special protected areas into four categories: strictly protected areas, national park, natural reserves, and national monument areas. This classification ensures a comprehensive approach to preserving the nation's valuable natural and cultural heritage.</p>	1994	2023
Law on Buffer Zones of Protected Areas	<p>The purpose of this Law is to regulate the determination of Special Protected Area Buffer Zones and the activities therein. The Law specifically provides for zones in two categories – Strictly Protected Areas and National Conservation Parks.</p>	1995	
Law on Fauna	<p>The law aims to regulate activities related to the protection, breeding, and proper utilization of animal resources. It emphasizes safeguarding animals other than livestock and domestic animals, ensuring that their genetic and environmental integrity is maintained. This legislation takes into account various existing laws, including the Constitution of Mongolia, the Law on Environmental Protection, and the Law on Genetic Resources. In cases where there is a conflict between this law and international treaties to which Mongolia is a party, the provisions of the international treaties will take precedence.</p> <p>In addition, if a damage on Fauna is recorded, the amount of compensation is estimated by multiplying twice the ecological-economic intrinsic value of the fauna, which is defined the government (Article 37.2).</p>	2012	2024
Law on Natural Plants	<p>The regulation and protection of plant resources in Mongolia are of utmost importance, given the country's rich biodiversity and unique ecosystems. The Mongolian Law on Natural Plants aims to ensure the sustainable use, proper management, and</p>	1995	2024

Relevant Legislation and Lender Requirements

Name of the Law	Summary description	Year Adopted	Year of Amendment
	<p>rehabilitation of natural plants other than forestry and cultivated plants. This law is an integral part of the environmental legislation, which also includes the Mongolian Law on Environmental Protection and the Law on Genetic Resources.</p> <p>Plants are classified according to their resources and regenerative capacity as follows (Article 3.2):</p> <ul style="list-style-type: none"> • Endangered; • Rare; and • Common. <p>Endangered plants include plants that are not able to regenerate naturally, have a very limited distribution, no resources to use, and are in danger of extinction (as set out in the annex to this law) (Article 3.3).</p> <p>Rare plants include plants with limited natural regenerative capacity, limited distribution and resources, and near threatened species. The list of rare plants is approved by the Government (Article 3.4).</p> <p>Plants other than those specified in Articles 3.3 and 3.4 of this law shall be considered as common.</p> <p>Citizens, business entities and organizations shall hand over the land used for industrial purposes to the soum or district governor after creating conditions for rehabilitation or rehabilitation with their own funds in accordance with relevant regulation (Article 9).</p>		
Law on Plant Health and Plant Protection	<p>The Plant Health and Plant Protection Law of Mongolia is a comprehensive legal framework designed to safeguard the nation's agricultural integrity and natural balance. Its primary objectives are to ensure food security, promote free trade, and protect plant health across Mongolia's vast and diverse landscape.</p> <p>It aims to prevent, control, and eradicate plant pests while regulating the import, export, re-export, and transit of plants and plant products.</p>	2024	-
Law on Forest	<p>This Law sets forth the principles and regulations for the protection, restoration, possession, use of forests, and prevention of forest and steppe fires in Mongolia. It aims to safeguard the ecological integrity and biodiversity of the nation's forests.</p>	2012	2023
Law on Water	<p>The Law on Water, first adopted in 2004 and last amended in 2020, is an umbrella law for water resources management, making provision with respect to the proper use, protection and restoration of water resources of Mongolia. The purpose of the Law is to govern relations concerning the protection and rational use and restoration of water resource and its basin. The law introduced important principles, including on establishing an institutional framework for IWRM; on the mandates of State organizations responsible for IWRM; on the introduction of River Basin Organizations, each comprising a River Basin Authority and a River Basin Council; and on the engagement of the private sector in water management activities e.g. through state corporations and Public private partnership (PPP) arrangements.</p>	2012	2024

Relevant Legislation and Lender Requirements

Name of the Law	Summary description	Year Adopted	Year of Amendment
	<p>The law also initiated the reassignment of many water functions from the central government to local governments, including for governors on issuing and monitoring water use permits, and on revoking water use permits, and for Citizens' Representative Hural on overseeing the implementation of the Law; on reviewing and approving Governor reports as well as the GOM's policies and programs, and decision taken. Specifically, Citizens' Representative Hurals of Baghs/Bags and Khoros coordinate the exploitation and possession of wells, water storage and irrigation infrastructure, discuss and take decisions on the Governor's proposal to dig wells and construct pools, water storages and irrigation schemes for the purpose of watering pasture, hay-field and croplands. The Law on Water also regulates permitting for water consumers. The issue of setting water intake limits is governed by the Law on Water as well as by the Law on Urban Water Supply, Sanitation Sewerage Use and the regulations issued thereunder.</p> <p>With regard to possession of a well, according to the Law on Water (2012), citizens and business entities have the right to use water in accordance with the legislation based on water use permits and agreements of specific purpose and conditions. There are two classifications depending on the purpose of water use and consumption: the water user and the water consumer. As indicated in the law, if water consumers (households) wish to obtain permission to consume water from a well, they need to submit a request to the aimag Environment Department containing information on the purpose and quantity of the water to be used, a copy of the land certificate (ownership, possession or use), and details of the well. The aimag Environment Department then registers the water consumer wells in a water database and issues a "well passport". According to the law, the right to possess and use water facilities and wells is granted for a period up to five years.</p>		
Law on Water Pollutant Fee	The Law on Water Pollution Fee was adopted on 17 May 2012 and last amended in 2024 to deal with the issue of setting the amount of compensation / pollution fee / that citizens, economic entities and organizations that pollute water have to pay. There are no more legal obstacles to implement and enforce the 'polluter-pays' principle.	2012	2024
Law on Air	<p>This Law regulates relations involving air protection, preventing pollution, and reducing and controlling emissions. The law aims to regulate relationships concerning the protection of the surrounding air, including the prevention of air pollution, and the reduction and control of air pollutant emissions. It outlines the powers of state and local self-governing bodies, as well as the rights and obligations of citizens, business entities, and organizations in air protection efforts.</p> <p>The law regulates air quality monitoring and information dissemination, implementation of air protection measures, and various miscellaneous provisions. It also includes specific articles on the monitoring system, state unified statistics on air pollutant</p>	2012	2023

Relevant Legislation and Lender Requirements

Name of the Law	Summary description	Year Adopted	Year of Amendment
	emissions, the deliberate influence on air conditions and weather phenomena, and the imposition of air pollution fees.		
Law on Air Pollutant Fee	<p>This law regulates the imposition of air pollution fees on individuals and the payment of such fees.</p> <p>The responsibilities of individuals and entities subject to the air pollution fee include their obligation to register appropriately. The specific items and activities subject to the fee ensure that all sources of air pollution are accounted for. The measurement units used when calculating the fee provide clarity and consistency in determining charges.</p> <p>The fee rates and the amount to be charged are also discussed, while provisions for credits and exemptions allow for certain circumstances where fees may be reduced or waived. The procedures for paying and filing the fees are set forth to ensure a streamlined process for compliance. Finally, the liabilities and penalties imposed on those who violate the law emphasize the legal consequences of failing to adhere to the regulations.</p>	2010	2024
Law on Waste	<p>The Waste Management Law is designed to establish a comprehensive framework for the effective reduction, sorting, collection, transportation, storage, re-use, recycling, recovery, disposal, and export of waste. With a focused objective of minimizing and preventing the adverse impacts of waste on human health and the environment, this law seeks to integrate waste into the economic cycle, conserve natural resources, and enhance public awareness regarding waste management practices.</p> <p>This law regulates the management of various types of waste, including general/common solid waste and hazardous waste in gaseous, liquid, or solid states, excluding radioactive waste. By setting clear regulations and standards, the law aims to foster a sustainable approach to waste management and ensure a healthier, cleaner environment.</p>	2017	2024
Law on Toxic and Hazardous Chemicals	<p>The purpose of this Law is to regulate the export, import, and transportation of toxic and hazardous chemicals across the borders of Mongolia, as well as their production, storage, sale, transport, use, destruction, and associated controls. It classifies chemicals into toxic and hazardous categories, based on their impact on human health, the environment, and wildlife. The classification is jointly approved by government members in charge of environmental and health issues.</p> <p>The law also outlines the permissions required to conduct activities involving these chemicals, except for explosives. Permissions for activities such as export, import, trans-border transportation, production, sale, use, and destruction of toxic and hazardous chemicals are issued in accordance with the Law on Permits.</p>	2006	2024
Law on Protection of Cultural Heritage	The Law on the Protection of Cultural Heritage aims to regulate activities related to search, registration, research, classification, evaluation, preservation, protection, restoration, recreation, transmission, inheritance, ownership, possession, use and	2014	2015, 2016, 2020, 2021, 2023, 2024

Relevant Legislation and Lender Requirements

Name of the Law	Summary description	Year Adopted	Year of Amendment
	<p>promotion of cultural heritage. Cultural heritage is categorized into tangible and intangible forms. Tangible heritage includes immovable historical and cultural monuments and movable memorial objects, while intangible heritage encompasses non-physical cultural expressions and traditions.</p> <p>Article 38. Prohibited activities related to protection of cultural heritage. The following activities that may cause damage to cultural heritage are prohibited:</p> <ul style="list-style-type: none"> • To build infrastructure facilities in the buffer zone of historical and cultural monuments, to engage in mining, agriculture and production activities (Article 38.1.1.); • To issue land for construction of towns and buildings, construction of new roads, allocation of agricultural lands, construction of hydropower plants, exploration and exploitation of minerals without prior exploration and research by palaeontological, archaeological and ethnographic professional organizations (Article 38.1.2.); • To transfer, store, transport and move movable historical and cultural monuments of public property to another organization or environment without the permission of the owner, except in cases provided by law (Article 38.1.3.); • If the conclusion of palaeontological, archaeological, ethnographic preliminary exploration and research work determines that there is a potential risk to cultural heritage, it shall be a ground to terminate economic activity (Article 38.2.); and • If tangible cultural heritage is discovered during the possession and use of subsoil, the subsoil user shall stop its work and immediately notify the soum or district governor, police and the organization in charge of the issue (Article 38.3.). 		
Law on Culture	The Law on Culture defines the state policy and principles on culture and regulates the relations concerning conducting cultural activities, its management, organization, rights and responsibilities of stakeholders, and identifying the economic basis. The state shall implement the following policy on culture, namely to keep cultural heritage under special attention and patronage of the state; to strengthen the unified national values by cherishing and passing on national values such as mother language, script, national history, culture, heritage, traditions and customs; and to respect, protect and promote diversity of cultural expressions (Article 4, paragraph 4.1).	2021 (revised edition)	2023,2024
Law on Land	The Law on Land, adopted on 7 June 2002 and last amended in 2024, regulates the possession and use of land by citizens, business entities and organizations. The Law is currently being revised. The proposed Land Package Law includes the General Land Law; the Law on Allocation of Land to Citizens of Mongolia for Ownership; the Law on Cadastre; the Law on Land Fees; the Law on Land Acquisition based on Necessary Social Needs. The Law shall, among others, strengthen land allocation and trade through the electronic land exchange, protect the legal rights of	2002	Recent amendments in 2017, 2018, 2019, 2022,2023, 2024

Relevant Legislation and Lender Requirements

Name of the Law	Summary description	Year Adopted	Year of Amendment
	citizens and legal entities promote integrated land planning and registration through inter-sectoral coordination.		
The Law on Allocation of Land to Mongolian Citizens for Ownership	<p>The purpose of this law is to regulate the allocation of land to citizens for ownership and related issues arising from such allocation.</p> <p>The law provides definitions for key terms, such as "land," which includes the surface of the landscape and its spatial layers, and "allocation of land to citizens for ownership," which refers to transferring land ownership from the lands specified in the Constitution of Mongolia to Mongolian citizens. Land allocated to citizens can be used for family needs and agricultural or farmstead purposes.</p>	2002	Recent amendments in 2015, amendments in 2017, 2015, 2018, 2022, 2024
Labour Code	<p>The Labour Code sets out the rights and duties of employers and employees including collective agreement, collective bargaining, collective and individual labour disputes, labour conditions, terms and conditions of work, liabilities for breach of the legislation, and to ensure gender equality.</p> <p>This law provides for the rights of employees to be provided with labour conditions that comply with health and safety laws and regulations; to receive payment for work done; to holiday; to freely assemble with other employees for the purpose of protecting the rights and legitimate interests including through representative organisations and collective agreements; to strike in certain circumstances; to receive a pension, an entitlement to social insurance and death in service benefits and to other benefits as may be provided in employment and collective agreements.</p> <p>Additionally, the law prohibits discrimination in the workplace based on nationality, race, sex, social origin or status, wealth, religion, or ideology, but women are prevented from undertaking certain forms of work as set out in separate regulations. Women with children are protected from discrimination and are entitled to maternity leave. Parents with children under three years old may take childcare leave and employers must re-engage such employees on their return to work. Collective agreements may be concluded within professions or economic sectors and registered with the applicable regulator. The Labour arbitration court settles collective labour disputes and a court or commission settles individual labour disputes.</p>	Revised edition 2021	2022, 2023, 2024
Law on Occupational Health and Safety	<p>The purpose of the Law on Occupational Health and Safety is to establish the state policy and principles related to labour safety and hygiene. It aims to regulate the relationship between state organizations in terms of managing and monitoring labour safety and hygiene requirements and standards in the workplace. The law is designed to ensure a safe and hygienic work environment for employed citizens by setting clear guidelines for labour safety and hygiene standards.</p> <p>This law sets out provisions in relation to the rights of workers; rights and duties of employers; use of machinery and equipment; use of toxic chemicals, explosives, radioactive and biological substances; fire safety; medical examinations of workers;</p>	2008	2022, 2023

Relevant Legislation and Lender Requirements

Name of the Law	Summary description	Year Adopted	Year of Amendment
	<p>protective equipment; workers with disabilities; registration, handling and investigation of accidents and diseases; sanctions for non-compliance; and division of powers between different government bodies.</p> <p>Employers are required to maintain safe and healthy working conditions. The law has detailed instructions for employers with regard to use of machinery and equipment, machineries for lifting, delivering and transporting as well as fire safety requirements. Employers are required to arrange free of cost preliminary and periodic medical check-ups (related to their work performance) for all workers.</p> <p>Workers also have a right to work at safe and healthy workplaces, have medical insurance to cover industrial accidents, and suspend work in the face of imminent danger.</p>		
Law on Health	Reorganised health care organizations in terms of function and structure in different levels of the system.	2011	2020, 2021, 2023, 2024
Law on Hygiene	<p>The law on hygiene aims to regulate relations to ensure favourable conditions for human health and safety. It focuses on preventing, mitigating, and eliminating negative environmental impacts on human health. Various hygiene conditions and requirements are established, including those related to the environment, urban development and constructions, workplaces, industries and services, raw materials, products, preparations substances.</p> <p>The law also regulates activities related to health impact assessments, the rights and obligations of local authorities, entities, organizations, and citizens to comply with hygiene requirements. It covers hygiene management, organization and control, surveys, and prohibitions, ensuring comprehensive hygiene oversight and enforcement.</p>	2016	2022, 2023
General Law on Social Insurance	The purpose of this law is to define the types and forms of social insurance, and the scope of its effect, to determine the legal basis for payment of insurance premiums, formation of the social insurance fund and its administration, social insurance institutions and the activities of social insurance inspectors, and to regulate relations related to their implementation.	2023 (revised edition)	2024
Law on Minimum Wage	<p>The purpose of this Law is to regulate relations in connection with determining the minimum basic hourly salary /wage/ to be adhered to in labor contracts, hired work contracts, and other similar contracts.</p> <p>The Minimum wage shall mean the minimum limit of the basic hourly remuneration /wage/ that should be observed in general which was determined by the competent person in order to protect the legal interests of employees and workers /hereinafter referred to as "employees"/ who work under labor contracts, hired work contracts, and other similar contracts for simple jobs that do not require specific education or special skills.</p> <p>It shall be prohibited to set the basic hourly salary /wage/ of an employee working under a labor contract, a hired work contract,</p>	2010 (revised edition)	2015, 2021 (revised edition), 2022-

Relevant Legislation and Lender Requirements

Name of the Law	Summary description	Year Adopted	Year of Amendment
	<p>or other similar contracts for the job requiring certain education, special professions, and skills at the minimum wage.</p> <p>Provision specified in paragraph 3.1 of this Law shall not prevent an employee from setting his/her salary /wage/ higher than the minimum wage, and the employer or principal (hereinafter referred to as "employer") from providing a salary/wage higher than the minimum wage.</p> <p>The minimum wage shall be determined by the tripartite National Committee for Labor and Social Consensus, which has the representatives of the state-level organization that represents and protects the rights and legal interests of the Government, the employer, and the employee.</p> <p>The tripartite National Committee for Labor and Social Consensus shall set the minimum wage once every two years.</p> <p>An employer who employs an employee under a labor contract or a hired work contract or other contracts equivalent to them shall be obliged to pay him/her a basic salary /wage/ not less than the amount determined by the tripartite National Committee for Labor and Social Consensus.</p>		
Law on Pensions, Benefits, and Payments for Industrial Accidents and Occupational Diseases to be Issued from the Social Insurance Fund	<p>This Law regulate relations in connection with the establishment and issuance of pensions, benefits, and payments from the insurance fund for industrial accidents and occupational diseases, providing discounts and exemptions of the premiums, and the creation of a database.</p> <p>Under the law, sick leave is compensated from the Government-run social insurance program, except for the first five days of the leave. Leave is provided as determined by the designated medical commission at the local hospital. The compensation rate is determined by the social security legislation and depends on the number of years the employee has worked. The first five days of the leave are to be paid by the employer. Employment of a worker is secure during the term of sick leave.</p> <p>There is provision for benefits in the case of industrial accidents and occupational diseases if the accident occurred at workplace or in discharge of duties elsewhere, before or after work and on the way to and from work. The law provides the following benefits to the insured persons: Disability pension; Dependent's pension; Temporary disability benefit; and Rehabilitation costs.</p>	2023 (revised edition)	-
Law on the Promotion of Employment	The purpose of the law is to create a legal framework to support employment of the population and its type, scope, funding and organization of the system in order to regulate employment.	2011 (revised edition)	-
Law on Ensuring Gender Equality	<p>This law specifically ensures gender equality in political, legal, economic, social, cultural and family relations, and regulates relations related to their implementation.</p> <p>It requires gender mainstreaming into law and policy development as well as into all activities of organizations – agencies related to law and policy-making.</p> <p>The Law defines General principles and policy to ensure of gender equality (Article 5);</p>	2011	Multiple amendments

Relevant Legislation and Lender Requirements

Name of the Law	Summary description	Year Adopted	Year of Amendment
	<p>Prohibition of gender discrimination (Article 6);</p> <p>Special measures to ensure equality of men and women (Article 7); Guarantees on ensuring gender equality in state structure, economic, social and cultural spheres (Chapter Two); institutional arrangements (Chapter Three); Filing of complaints on the violation of gender equality (Article 23);</p> <p>Resolution of complaints on violation of the ensuring gender equality (Article 24); and Liabilities imposed on violations of the Law.</p> <p>The guarantees for equality as defined in the LPGE are reflected in the relevant provisions and are being implemented in the Law on Families, Labour Code, Law on Promoting Employment, Package of Laws on Education 2002, the Law on Health, the Law on Child Protection, Law to Combatting Domestic Violence, Law on Combating Human Trafficking and the Law on Elections.</p>		
Law on Children Protection	This law explicitly confirms children's right to be protected from corporal punishment.	2024 (revised edition)	-
Law on Combating Domestic violence	This law addresses violence against women and girls.	2016 (revised edition)	2019, 2021, 2022, 2023-
Law on Human Rights of Persons with Disabilities	This Law governs relations concerning identification of principles, rights, responsibilities and participation of government organizations, individuals and legal entities in ensuring, enforcing and safeguarding equitable rights of persons with disabilities to participate in social life.	2016	2021, 2022, 2023-
Law on Resolution of Petitions and Complaints from Citizens to state authorities and public officials	This law partly addresses grievance mechanisms. The Law stipulates that governmental bodies are to respond to inquiries and complaints from citizens and must do so within 30 calendar day. If necessary, this period shall be extended for up to 30 days by an executive officer of a particular organization. A petitioner or a complainant shall be informed of the extension of this period.	1995	Multiple amendments
Law on Land Use Fee	This law defines land fee payers (Mongolian citizens, business entities, or organizations possessing or using land based on the decision for land possession and use in accordance with legislation, and foreign diplomatic missions and consular offices, representative agencies of international organizations, foreign legal entities and citizens, and stateless persons that use land shall be land fee payers); land subject to land use fees (Fees shall be charged for land falling under the main classification of the unified land territory specified in the Article 10 of the Land law and special usage land and for land possessed or used by citizens, business entities, or organizations according to decision made by competent authority, which have power to decide to let someone possess or use land); defines fair value of land; indicators used in estimating land fees and determining the indicators; rate and percentage of land fees; exemptions from land fees; as well as resolving disputes on land fees.	1997	Multiple amendments

Relevant Legislation and Lender Requirements

Name of the Law	Summary description	Year Adopted	Year of Amendment
Minister of Environment and Green Development, Ordinance A-117 (Inclusion of social impacts in DEIA)	<p>The Ordinance sets out requirements for disclosure of the DEIA results and consultation with the local community. It stipulates that the DEIA company/consultant should obtain feedback from local government, potentially affected persons and local residents. It also requires that the DEIA consultant organises project-specific engagement selecting appropriate measures to ensure participation and disclose project information. The following methods are identified as useful: sample surveys, questionnaires, interviews, community resource mapping, open discussions and focus group discussions.</p> <p>The DEIA Report must include the following information:</p> <ul style="list-style-type: none"> • Meetings and consultations with the project's affected persons and project stakeholders, surveys conducted, when and how information was disclosed; participants attendance; • Main themes discussed, information on major issues raised during consultation; and • Reasonable suggestions raised during consultations which should be reflected in project planning, implementation and operation. <p>Where a project covers the territory of several <i>baghs</i> and <i>soums</i>, the DEIA consultant will present the DEIA findings at public meetings in the affected <i>baghs</i> to solicit further concerns and suggestions. The DEIA consultant will also inform the <i>khurals</i> in the affected <i>soums</i> and obtain the <i>khural</i> members' views about the project.</p>	2014	-

Relevant Legislation and Lender Requirements

Name of the Law	Summary description	Year Adopted	Year of Amendment
Minister of Environment and Green Development, Ordinance A-03 (Public consultation procedure)	<p>This Ordinance applies to Environmental Strategic Impact Assessment, Cumulative Impact Assessment and DEIAs. The following is required: Information disclosure and transparency of, and access to, information, ensuring exchange of information; consultation and negotiation between proponents of development policy, programs and plans and potentially affected people (directly and indirectly affected), local communities and other organisations; use of data and suggestions by project stakeholders in designing mitigation measures; respect for local peoples' traditional culture, traditions, values, traditional way of life and rights. Information on potential negative impacts on the environment and human health should be open and accessible with citizens and the public provided free access to this information.</p> <p>The public participation required during the DEIA process is as follows:</p> <ul style="list-style-type: none"> • The DEIA will ensure public participation at assessment stages; • People's feedback on predicted impacts will be obtained using a participatory approach; • Direct and indirect impacts will be assessed using such tools like consultation, discussions, surveys and cover livelihoods and social issues; • The project proponent will provide affected communities the information on the project and its positive and negative impacts, and mitigation measures; • The DEIA Consultant and Project Proponent will, within 15 days after completion of the DEIA Report and Environmental Management Plan, disclose these documents to the bagh/khoroo Public meetings and seek feedback; • Where a project covers the territory of several <i>baghs</i> and <i>soums</i>, the DEIA Consultant will communicate the DEIA results at each <i>bagh</i> public meeting and <i>soum's khural</i> to get their feedback and suggestions; • Affected communities will provide their feedback on the proposed Project before a final decision is made; • The Project Proponent, Governors of <i>soums and baghs</i>, and <i>aimag</i> Environmental agencies are responsible for providing access to the approved DEIA Report; • The Project Proponent has to report to communities and the public at least once a year on Project implementation; • Grievances on gaps in the DEIA Report may be logged by people/communities to the Project, local authority and the Ministry in charge of environmental issues; • The Ministry in charge of environmental issues shall resolve grievances within the scope of the law. In the event that a person or community laws does not agree with the decision, they may lodge a complaint with the courts. 	2014	-

Environmental Standards

The key Mongolian National Standards are summarised in table below:

#	Name of Mongolian National Standard
1	MNS 17.5.13. 1980. Environmental Protection: Rehabilitation of eroded land, terms and definitions
2	MNS 5914:2008. Environment. Land reclamation. Terms and definitions
3	MNS 5916:2008. Environment Requirements for fertile soil removing and its temporary storage during the earth excavation
4	MNS 5918:2008. Environment. Re-vegetation of destroyed land. General technical requirements
5	MNS 4585:2016. Air quality. General technical requirements
6	MNS 4991:2000. Occupational safety and health. Requirement for method of determination of toxic substances concentration in the air of working zone
7	MNS 5885:2008. Acceptable concentration of air pollutant elements. General technical requirements
8	MNS 6063:2010. Air quality. Acceptable concentration of pollutant elements for atmospheric air in public area
9	MNS 5803:2007. Occupational safety and health. General requirements for lead content in workplace air and the workplace
10	MNS 4586:1998. Water quality. General requirements
11	MNS 3342:1982. General requirement for preventing from groundwater pollution
12	MNS ISO 5667-11:2000. Water quality. Sampling. Part 4: Guidance on sampling of groundwater
13	MNS 6148:2010. Water quality. Maximum limit of substance contaminating the ground water
14	MNS 4943:2015. Water quality. Effluent treated wastewater. General requirements
15	MNS 6230:2010. Identification of wastewater discharge point. General requirements
16	MNS 5924:2015. Pit latrine and sewage pit. Technical requirements
17	MNS 3475:2003. Plant quarantine. Terms and definitions.
19	MNS 5850:2008. Soil quality. Soil pollutants elements and substance
20	MNS 3298:1991. Soil. General requirements for sampling
21	MNS 2305:1994. Soil. Procedure for sampling, packaging, transportation and storage.
22	MNS 5546:2005. General requirements for assessment of soil erosion and degradation of vegetation cover in pasture lands.

Relevant Legislation and Lender Requirements

#	Name of Mongolian National Standard
23	MNS 3297:1991. Environment protection. Soil. The norm for sanitary condition of soil in town and residential areas
24	MNS 4643:1998. Occupational safety and operational security signs. Colour of safety signs.
25	MNS 4994:2000. Occupational safety and health. Vibration. Requirement for general safety.
26	MNS 4994:2000. General requirements for measuring vibration.
27	MNS 5029:2011. Occupational safety and health. Label and marking of toxic and hazardous chemicals
28	MNS 5079:2001. General safety requirements for loading and unloading.
29	MNS 5105:2001. Occupational safety. Industrial hygiene. Hygiene protection areas norm, general requirements.
30	MNS 5146:2002. Occupational safety. Industrial hygiene. Electric safety. Protective conductive earth, neutralling.
31	MNS 5390:2004. Occupational safety and health. Fire safety of electricity. General requirements.
32	MNS 4930:2000. Safety of machinery. General requirements.
33	MNS 4969:2000. Organization of a training. Basic rules.
34	MNS 4643:1998. Occupational safety. Color of safety signs.
35	MNS 4994:2000. Occupational safety and health. Vibration. Requirement for general safety.
36	MNS 0012.4.005:1985. Device and method for protection from noise.
37	MNS 5003:2000. General requirements for the measurements of noise.
38	MNS 5150:2002. Electric safety. General requirement.
39	MNS 5145:2002. Electric safety. Maximum voltage and maximum level of current.
40	MNS 5149:2002. Industrial hygiene. Power frequency electric fields. Permissible levels of field strength and requirements for control at workplaces.
41	MNS 5002:2000. Occupational safety and health. Noise. Requirements for general safety.
42	MNS 4931:2000. Personal protective equipment. Types and general requirements.
43	MNS 5388:2004. Hearing protection equipment (ear plug, ear muff). General technical requirements.
44	MNS 5389:2004. Eye protection equipment-Goggles.
45	MNS 5621:2006. Head protection equipment-Hard hat.
46	MNS 5622:2011. Safety gloves. General requirements.
47	MNS 5623:2006. Foot protection equipment. Safety boots.

Relevant Legislation and Lender Requirements

#	Name of Mongolian National Standard
48	MNS 5344:2011. General requirements for transportation of domestic waste.
49	MNS 5282:2003. Fire safety of petroleum products. General requirements.
50	MNS 5566:2005. Protection against fire. Fire protection instrument for building. Technical requirements.
51	MNS 4244:1994. Fire safety. General requirements.
52	MNS 3629:1983. Petroleum, petroleum product. Packaging, labelling and transportation.
53	MNS 4596:2014. Use of road signage, traffic light, protective bracket, and direction signs.
54	MNS 5645:2006. Transportation of construction materials in pieces and bulk. Classification, transportation condition. General requirements.
55	MNS 6515:2015. Passages for wild ungulates altogether highways and railways in steppe and gobi areas. General requirements.

Relevant Conventions

Mongolia has adopted a number of international conventions with regard to environment as shown in the table below.

#	Convention	Year of Accession
Environmental Conventions		
1	Convention on Biological Diversity	1993
2	UN Framework Convention on Climate Change (UNFCCC)	1994
3	Kyoto Protocol	1999
4	UN Convention to Combat Desertification	1996
5	Convention on the Protection of Wetlands of International Importance especially as Waterfowl Habitat (Ramsar)	1998
6	Vienna Convention for the Protection of the Ozone Layer	1996
7	Montreal Protocol (regulating substances that deplete the ozone layer)	1996
8	Convention on International Trade in Endangered Species of Fauna and Flora (CITES)	1996
9	Convention on the Transboundary Movement of Hazardous Waste (Basel)	1997
10	Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade	2001
11	Stockholm Convention on Persistent Organic Pollutants	2004
12	Convention on the Conservation of Migratory Species of Wild Animals	1999

Relevant Legislation and Lender Requirements

#	Convention	Year of Accession
13	MoU concerning the Conservation of Migratory Birds of Prey in Africa and Eurasia	2008
14	Paris Climate Accord	2016
Cultural Heritage Conventions		
15	Convention for the protection of cultural property during armed conflict	1964
16	World Heritage and Natural Heritage Convention	1990
17	Convention on the prevention measures of illegal entry and release of cultural heritage, as well as prohibition of cultural heritage ownership transfer	1991
18	Convention for the Safeguarding of Intangible Cultural Heritage	2005
19	Convention for the protection and promotion of the diversity of cultural expressions	2007

International Labour Organisation (ILO) Conventions

Mongolia has been a member of the ILO since 1968 and has ratified 20 ILO Conventions, of which 18 are in force, including all eight fundamental conventions, and one convention has been denounced. Ratified conventions are listed in the table below.

Convention Name	Ratification date by Mongolia
Freedom of association, collective bargaining, and industrial relations	
C087 – Freedom of Association and Protection of the Right to Organize Convention, 1948 (No.87)	03 June 1969
C098 – Right to Organize and Collective Bargaining Convention, 1949 (No.98)	03 June 1969
C135 – Workers' Representatives Convention, 1971 (No.135)	08 Oct 1996
Forced Labour	
C029 – Forced Labour Convention, 1930 (No.29)	15 Mar 2005
C105 – Abolition of Forced Labour Convention	15 Mar 2005
Elimination of child labor and protection of children and young persons	
C123 – Minimum Age (Underground Work) Convention, 1965 (No.123) Minimum age specified: 18 years,	03 Dec 1981
C138 – Minimum Age Convention, 1973 (No.138)	16 Dec 2002
C182 – Worst Forms of Child Labour Convention, 1999 (No.182)	26 Feb 2001
Equal opportunity and treatment	
C100 – Equal Remuneration Convention, 1951 (No.100)	03 Jun 1969

Relevant Legislation and Lender Requirements

Convention Name	Ratification date by Mongolia
C111 – Discrimination (Employment and Occupation) Convention, 1958 (No.111)	03 Jun 1969
Employment policy and promotion	
C088 – Employment Service Convention, 1948 (No.88)	17 Apr 2015
C122 – Employment Policy Convention, 1964 (No.122)	24 Nov 1976
C159 – Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No.159)	03 Feb 1998
C181 – Private Employment Agencies Convention, 1997 (No.181)	17 Apr 2015
Occupational safety and health	
C155 – Occupational Health and Safety Convention, 1981 (No.155)	03 Feb 1998
C176 - Safety and Health in Mines Convention, 1995 (No.176)	26 Nov 2015
Maternity protection	
C103 – Maternity Protection Convention, 1952 (No.103)	03 Jun 1969
Tripartite consultation	
C144 – Tripartite Consultation (International Labour Standards) Convention, 1976 (No.144)	10 Aug 1998

Source: ILO

EBRD Requirements

The EBRD's Environmental and Social Policy (ESP) and related Performance Requirements (PRs) guide the EBRD's commitment to promoting “*environmentally sound and sustainable development*” in the full range of its investment activities. The 2019 Policy is relevant to this Project and aims to ensure that issues such as environmental and social sustainability, the rights of affected workers and communities and compliance with relevant regulatory requirements and Good International Practice (GIP) are built in at every relevant stage of the project cycle. The ESP requires a Project to comply with the relevant PRs, relevant EU standards, and national law.

The PRs identified as relevant to the Project are summarised in the table below.

Performance Requirement	Summary and Objectives	Areas Covered
PR1: Assessment and management of environmental and social risks and impacts	<p><u>Summary</u></p> <p>This PR outlines the responsibilities of the client in the process of assessing the potential environmental and social risks and impacts associated with the Project and developing and implementing procedures for managing and monitoring these risks and impacts.</p> <p><u>Objectives</u></p> <ul style="list-style-type: none"> Identify and assess environmental and social risks and impacts of the Project; Adopt a mitigation hierarchy approach to address environmental and social risks and impacts from project 	<ul style="list-style-type: none"> ESIA Environmental and Social Management System (ESMS) Environmental and Social Policy Environmental and Social Management Plan (ESMP) Organisational capacity and commitment Supply chain management Project monitoring and reporting

Relevant Legislation and Lender Requirements

Performance Requirement	Summary and Objectives	Areas Covered
	<p>activities on workers, affected communities and the environment;</p> <ul style="list-style-type: none"> • Develop an environmental and social management system (ESMS) commensurate to the environmental and social risk impacts of the Project in a manner consistent with the relevant PRs; and • Promote continuous improvement of the client's environmental and social performance through the effective use of management systems. 	
PR2: Labour and working conditions	<p><u>Summary</u></p> <p>This PR recognises that for clients and their business activities, the workforce is a valuable asset, and that good human resources management and a sound worker-management relationship based on respect for workers' rights, including freedom of association and the right to collective bargaining, are key ingredient to the sustainability of business activities.</p> <p><u>Objectives</u></p> <ul style="list-style-type: none"> • Respect and protect the fundamental principles and rights of workers; • Ensure fair treatment, non-discrimination and equal opportunities of workers in accordance with the decent work agenda; • Establish, maintain and improve a sound worker-management relationship; • Ensure compliance with national labour and employment laws and any collective agreements to which the client is a party; • Protect women and men at work, including vulnerable workers such as young workers, persons with disabilities, migrant workers and refugees, workers engaged by third parties and works in the client's supply chain; • Prevent the use of forced labour and child labour (as defined by the International Labour Organisation (ILO)); and • Ensure that accessible and effective means to raise and address workplace concerns are available to workers. 	<ul style="list-style-type: none"> • Human resources policies • Working relationships • Child labour • Forced labour • Non-discrimination and equal opportunity • Workers' organisations • Wages, benefits and conditions of work • Worker accommodation • Collective dismissals • Grievance mechanism • Non-employee workers • Supply chain
PR3: Resource efficiency and pollution prevention and control	<p><u>Summary</u></p> <p>This PR outlines a project-level approach to climate impacts and greenhouse emissions, resource management and pollution prevention and control. This PR also recognises the concept and practice of Circular Economy and the importance of using best available techniques and good international practice to optimise resource use and efficiently prevent and control pollution.</p> <p><u>Objectives</u></p> <ul style="list-style-type: none"> • Adopt the mitigation hierarchy approach to addressing adverse impacts on human health and the environment arising from the resource use and pollution released from the project; • Avoid, minimise and manage project-related greenhouse gas (GHG) emissions; • Avoid, minimise and manage the risks and impacts associated with hazardous substances and materials, including pesticides; and • Identify, where feasible, project-related opportunities for resource efficiency improvements. 	<ul style="list-style-type: none"> • Resource efficiency • Pollution prevention and control • Greenhouse gases <p>Resource Efficiency</p> <ul style="list-style-type: none"> • Water • Waste <p>Pollution Prevention and Control</p> <ul style="list-style-type: none"> • Greenhouse gases (GHG) • Safe use and management of hazardous substances and materials • Pest management
PR4:	<u>Summary</u>	General requirements for health and safety management

Relevant Legislation and Lender Requirements

Performance Requirement	Summary and Objectives	Areas Covered
Health, safety and security	<p>This PR recognises the importance of managing health, safety and security risks to workers, project-affected communities and consumers associated with project activities, in accordance with the hierarchy of risk control. The client has the primary responsibility to provide safe and healthy conditions for their workers.</p> <p>Objectives</p> <ul style="list-style-type: none"> • Protect and promote the health, safety and security of workers, by ensuring safe, healthy and secure working conditions and implementing a management system, appropriate to risks associated with the project; and • Identify, assess, and manage health, safety and security risks to project-affected communities and consumers during the project life cycle from both routine and non-routine activities. 	<ul style="list-style-type: none"> • Occupational health and safety • Community health and safety • Gender-Based Violence • Specific requirements for health and safety management • Infrastructure, building and equipment design and safety • Hazardous materials safety • Product safety • Health and Safety Risks in Community Services • Traffic and road safety • Natural hazards • Exposure to disease <p>Security</p>
PR5: Land acquisition, restrictions on land use and involuntary resettlement	<p>Summary</p> <p>This PR addresses impacts of project-related land acquisition. Application of this PR is consistent with the universal respect for, and observance of, human rights and freedoms, specifically the right private property, the right to adequate housing and to the continuous improvement of living conditions.</p> <p>Objectives</p> <ul style="list-style-type: none"> • Avoid involuntary resettlement or, when unavoidable, minimise involuntary resettlement by exploring feasible alternative project designs and sites; • Avoid forced eviction; • Mitigate unavoidable adverse social and economic impacts from involuntary resettlement of affected persons by: (i) providing timely compensation for loss of assets at full replacement cost; and (ii) ensuring that land acquisition, restriction on land use, other assets and natural resources and involuntary resettlement activities are implemented with meaningful consultation, participation and disclosure of information, in accordance with the requirements of PR10; • Improve, or as a minimum restore the livelihoods and standards of living of affected persons compared to pre-displacement levels; and • Improve living conditions of physically displaced persons through the provision of adequate housing (including essential services and utilities) with security of tenure at resettlement sites. 	<ul style="list-style-type: none"> • Avoidance or Minimisation of Displacement • Avoidance of Forced Eviction • Negotiated Settlements • Consideration of Vulnerable Groups • Consideration of Gender Aspects • Socio-economic Surveys • Census, Inventory of Affected Assets and Cut-off Date • Valuation of Affected Lands and Assets • Eligibility Classification • Compensation and Benefits for Affected Persons • Voluntary Land Donations • Loss of Community Facilities, Utilities and Public Amenities • Stakeholder Engagement • Grievance Mechanism • Planning and Implementation • Organisational capacity and commitment • Monitoring and Evaluation • Physical Displacement and Resettlement Assistance
PR6: Biodiversity conservation and sustainable	<p>Summary</p> <p>This PR recognises that the conservation of biodiversity and sustainable management of living natural resources are fundamental to environmental and social sustainability. The</p>	<p>Biodiversity conservation</p> <ul style="list-style-type: none"> • Assessment of issues and impacts • The Protection and Conservation of

Relevant Legislation and Lender Requirements

Performance Requirement	Summary and Objectives	Areas Covered
management of living natural resources	<p>objectives of PR10 must be balances with the potential for utilising multiple economic, social and cultural values of biodiversity and living natural resources in an optimised manner.</p> <p>Objectives</p> <ul style="list-style-type: none"> • Protect and conserve biodiversity using a precautionary approach; • Adopt the mitigation hierarchy in the design and implementation of projects with the aim of achieving no net loss and where appropriate, a net gain of biodiversity; • Maintain ecosystem services; and • Promote good international practice in the sustainable management and use of living natural resources. 	<p>Biodiversity, Priority Biodiversity Features and Critical Habitats</p> <ul style="list-style-type: none"> • Legally Protected and Internationally Recognised Areas of Biodiversity Value • Invasive Alien Species <p>Sustainable management of living natural resources</p> <ul style="list-style-type: none"> • Supply chains
PR8: Cultural heritage	<p>Summary</p> <p>This PR recognises the importance of cultural heritage for present and future generations. Both tangible and intangible cultural heritage are important assets for economic and social development and are an integral part of cultural identity. In pursuing these aims, this PR is guided by applicable international conventions.</p> <p>Objectives</p> <ul style="list-style-type: none"> • Support the protection and conservation of cultural heritage; • Adopt the mitigation hierarchy approach to protecting cultural heritage from adverse impacts arising from the project; • Promote the equitable sharing of benefits from the use of cultural heritage in business activities; and • Where significant elements of cultural heritage are identified, promote the awareness, appreciation and enhancement of cultural heritage as well as potential socioeconomic benefits for local communities. 	<ul style="list-style-type: none"> • Consultation with Affected People, Communities, and Other Stakeholders • Assessment of Risks and Impacts • Chance Finds Procedure • Legally Protected and Internationally Recognised Areas • Project's Use of Cultural Heritage
PR10: Information disclosure and stakeholder engagement	<p>Summary</p> <p>This PR recognises the importance of an open and transparent engagement between the clients, its workers, worker representatives, local communities and persons affected by the Project and, where appropriate, other project stakeholders as an essential element of good international practice and corporate citizenship. Such engagement is also a way of improving the environmental, social and overall sustainability of projects.</p> <p>Objectives</p> <ul style="list-style-type: none"> • Outline a systematic approach to stakeholder engagement that will help the client build and maintain a constructive relationship with their stakeholders; • Provide means for effective and inclusive engagement with project stakeholders throughout the project cycle; • Ensure that appropriate environmental and social information is disclosed and meaningful consultation is held with the project's stakeholders and where appropriate, feedback provided through the consultation is taken into consideration; and • Ensure that grievances from stakeholders are responded to and managed appropriately. 	<ul style="list-style-type: none"> • Stakeholder Identification • Stakeholder Engagement Plan • Information Disclosure • Meaningful Consultation • Disclosure and Consultation on Category A Projects • Grievance Mechanism • Changes to Project Environmental and Social Risks and Impacts

Relevant Legislation and Lender Requirements

Relevant EU Directives

The EBRD ESP requires the Project to meet all relevant EU substantive environmental standards. The key relevant EU Directives are as follows:

- Directive 2011/92/EU Environmental Impact Assessment, amended in 2014 by the EIA Directive 2014/52/EU
- EU Directive 2000/60/EU Water Framework Directive
- EU Directive 2009/147/EC on the Conservation of Wild Birds
- EU Habitats directive, Council Directive 92/43/EEC
- Directive 2003/4/EC of the European Parliament and of the Council of 28 January 2003 on Public Access to Environmental Information
- Directive 2008/98/EC – The Waste Framework Directive
- EU Framework Directive on Safety and Health at Work (89/391/EEC) and associated directives [89/654 EEC (workplaces), 89/655 EEC (work equipment), 89/656 EEC (personal protective equipment), 90/269 EEC (manual handling of loads) and 90/270 EEC (display screen equipment)]
- EU Directive 2013/35/EU of the European Parliament of and of the Council of 26 June 2013 on the minimum health and safety requirements regarding the exposure of workers to the risks arising from physical agents (electromagnetic fields) (20th individual Directive within the meaning of Article 16(1) of Directive 89/391/EEC) and repealing Directive 2004/40/EC (the EMF Framework Directive)
- EU Directive 2012/27/EU of the European Parliament and of the Council of 25 October 2012 on Energy Efficiency
- EU Council Recommendation (1999/519/EC)

Appendix E

Outline Labour Management Plan

Objective

The objective of the Labour and Working Conditions Management Plan (the Plan) is to address the requirements of EBRD Performance Requirement (PR) 2 in relation to the labour force and their working conditions and rights.

Scope

This Plan outlines EBRD PR 2 requirements for labour and working conditions, as well as those measures identified in the ESIA to address the potential labour and working conditions that may arise in the context of this Project. This Plan will need to be developed further by the Construction Contractor for the construction phase.

Relevant legislation, standards and guidance

The following legislation, guidance and performance standards are relevant to this Plan:

Level	Key legislation / policy / guidance
International	EBRD PR2 Labour and Working Conditions
	EBRD PR4 Health, Safety and Security
	EBRD Strategy for the Promotion of Gender Equality 2021-2025
	EBRD PR10 Information Disclosure and Stakeholder Engagement
International	European Framework Directive on Safety and Health at Work, 1989 (89/391/EEC) and associated directives
	European Directive on Workplace Requirements, 1989 (Directive 89/654/EEC)
	International Labour Organisation (ILO) Conventions: <ul style="list-style-type: none"> Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) Right to Organise and Collective Bargaining Convention, 1949 (No. 98) Workers' Representatives Convention, 1971 (No.135) Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol) Abolition of Forced Labour Convention, 1957 (No. 105) Minimum Age Convention, 1973 (No. 138) Worst Forms of Child Labour Convention, 1999 (No. 182). Equal Remuneration Convention, 1951 (No. 100) Discrimination (Employment and Occupation) Convention, 1958 (No. 111) Employment Service Convention, 1948 (No.88) Employment Policy Convention, 1964 (No.122) Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No.159) Private Employment Agencies Convention, 1997 (No.181) Occupational Health and Safety Convention, 1981 (No.155) Safety and Health in Mines Convention, 1995 (No.176) Maternity Protection Convention, 1952 (No.103)
	Tripartite Consultation (International Labour Standards) Convention, 1976 (No.144)
National Law	Guiding Principles on Business, United Nations, and Human Rights (2011)
	The Voluntary Principles on Security and Human Rights (2000)
National Law	Civil Code, 2002
	Labour Code, revised version, 2021

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Level	Key legislation / policy / guidance
	<p>Law on Occupational Health and Safety, 2008</p> <p>Law on promotion of employment, revised edition 2011</p> <p>Law on Pensions Benefits provided by the Social Insurance Fund in Case of Industrial Accidents and Occupational Diseases</p> <p>Law on Health, 2011</p> <p>Law on Labour Safety and Hygiene, 2008</p> <p>Law on Hygiene, 2016</p> <p>Law on Minimum Wage, revised version, 2010</p> <p>General Law on Social Insurance, 2023</p> <p>Law on Pensions to be Issued from the Social Insurance Fund, 2023</p> <p>Law on Benefits to be Issued from the Social Insurance Fund, 2023</p> <p>Law on Ensuring Gender Equality, 2011</p> <p>Law on Children's Rights, 2016</p> <p>Law on Combating Domestic Violence, 2016</p> <p>Law on Human Rights of Persons with Disabilities, 2016</p> <p>Law on State Inspection, 2003</p> <p>Law on Violations, 2017</p> <p>Law on Sanitation, 2016</p> <p>Law on Standardization, Technical Regulation, and Conformity Assessment Accreditation, 2017</p> <p>Rules of the Labor Dispute Resolution Commission, Government Resolution #153, 13 April 2022</p> <p>Procedure for resolving labour disputes with the support of a labour mediator, Government Resolution #04, 4 January 2023</p> <p>Labor Arbitration Rules, Government Resolution #05, 4 January 2023</p> <p>Approval of general procedures for conducting inspection, Government Resolution #479, 28 December 2022</p> <p>Action Plan for the Protection of Human Rights in Business Activities, the Prevention of Human Rights Violations, and the Restoration of Violations (2023-2027)" (Parliament Resolution No. 231, June 14 2023)</p>

Potential impacts

The Project will generate a range of employment opportunities, including specialist labour, however there will also be the requirement for semi-skilled and unskilled labour. During construction potential impacts related to labour and working conditions include:

- Migrant workers, especially those who are unskilled, are more vulnerable to exploitation.
- Potential for migrant workers to pay recruitment fees to secure work, increasing vulnerability to exploitation, such as forced labour.
- Potential for employers to hold migrant workers' passports on arrival in Mongolia, increasing vulnerability to exploitation, such as forced labour.
- Potential for workers to be paid below the minimum wage or not be paid on time.
- Excessive overtime and inadequate rest time.
- Potential for workers to be discriminated against.
- Inability of workers to raise complaints or to engage constructively with employers.
- Potential for workers to be employed in unsafe and/or unhealthy working conditions, and potential loss of life.

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- Limitations on free association and right to strike.
- Right to an effective remedy/ availability of suitable means of grievance resolution in relation to incidents involving security services.
- Potential for workers' freedom of movement to be negatively impacted.
- Potential for workers to be informally recruited, increasing risk of unethical recruitment practices, increasing worker vulnerability to exploitation.
- Potential for child workers to be employed at the margins of the Project or in supply chains.
- Risk of spread of infectious diseases among working personnel.

Roles and responsibilities

The Construction Contractor will be responsible for complying with all relevant national and EBRD PRs and adhere to all standards specified in this Plan during construction.

Contractor Project Manager

The Contractor Project Manager will:

- Have overall responsibility for ensuring the CEMSP, including this Plan, are implemented by the Project.
- Ensuring that labour and work conditions are in compliance with this Plan;
- Contracting the construction workforce and ensuring that there are clear contractual management responsibilities and monitoring and reporting requirements.
- If required, will ensure that all work permits are obtained and in place prior to outset of work.
- Liaising with the Contractor HR Manager.
- Setting targets for monitoring to ensure that all activities and results are measured against a goal.
- Monitoring Third party suppliers to ensure the requirements and responsibilities set out in this Plan are met.

Contractor Human Resource Manager

The Contractor HR Manager will undertake the following:

- Maintaining and ensuring overall implementation of this Plan.
- Project labour/workforce management together with Project Manager.
- Development, roll-out and maintain Human Resources policies, procedures and standards.
- Public distribution of vacancy announcements.
- Recruitment and selection governance.
- Contract administration.
- Develop and maintain an ongoing Workforce Plan.
- Management of any union relationships and communications.
- Preparation of the Code of Conduct and overall responsibility for ensuring that all employees have been inducted in the Code of Conduct.
- Management of salaries and benefits including monitoring market conditions and proposing changes to salary and benefit arrangements, for approval by the Project Manager.
- Maintain individual employee training requirements register and completion of training records.
- Maintain the Labour Grievance Mechanism (together with collecting any grievances recorded by others) and ensuring relevant personnel are notified of actions to address grievances, and monitor follow up.
- Prepare salaries for all staff.
- Management of social aid payments and salary advances.

Contractor E&S and H&S Managers

In addition to the overarching responsibilities identified in the ESMP, specific responsibilities of the Contractor E&S and H&S Managers in relation to this Plan include:

- Report to the Contractor HR Manager on issues related to workers' health, safety and environment.

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- Training in relation to this Plan, supported by the HSE Supervisors on site.
- Undertaking a monthly site inspection.
- Ensuring that the Daily Site Logs (as appropriate) and Monthly Checklists have been completed.
- Maintaining the Non-conformance and corrective action register and Accident, Incident and Near Miss Register.
- Ensuring corrective actions are implemented, as relevant.
- Reporting on any issues as part of the Monthly Project Progress Reporting.
- Recommending to the Project Manager additional/revised mitigation measures to ensure effectiveness.
- Developing and implementing the training and toolbox talks related to this Plan.

Contractor Site Manager

The Site Manager will be responsible for:

- Detailed programming of construction activities.
- Ensuring that all supply chains are aware of and comply with the applicable policies and this Plan.
- Labour/workforce management at each site, in liaison with HR Manager.
- Identifying Work Force requirements and communicating these to the HR Manager and Project Manager.
- The application of HR policies, procedures and standards in work teams.
- Developing and obtaining approvals of performance assessments and fitness for work.
- Ensuring all personnel have the appropriate training to undertake their work including any specialised training.
- Ensuring Labour Management issues and the Labour Grievance Mechanism on site are reported and referred to the HR Manager for resolution.

All employees

All employees are responsible for:

- Be familiar with Human Resources Policies, Procedures and Standards through induction and other company provided training and communications and applying these requirements in the discharge of their duties.

Control measures

Human resources policies and procedures

The Construction Contractor will have in place, as a minimum, the following Project policies:

- HR Policy
- Discrimination and Harassment Policy
- Gender Equality and GBVH Action Plan
- Local Employment and Procurement Policy and procedure
- Supply chain policy
- Health and Safety Policy
- Labour Grievance Policy

The Construction Contractor will provide all construction workers with documented information that is clear and understandable, regarding their rights under national labour and employment law and any applicable collective agreements, including their rights related to hours of work, wages, overtime, compensation, and benefits upon beginning the working relationship and when any material changes occur.

The Construction Contractor will provide all construction workers with a summary of their employment service and training activities at the end of each contract as a means to finding continued employment.

The Construction Contractor will provide all construction workers with documented information that is clear and understandable, regarding their rights under national labour and employment law and any applicable

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collective agreements, including their rights related to hours of work, wages, overtime, compensation, and benefits upon beginning the working relationship and when any material changes occur.

The Construction Contractor will provide all construction workers with a summary of their employment service and training activities at the end of each contract as a means to finding continued employment.

Responsible recruitment and procurement of goods and services

The Construction Contractor will screen all potential service and construction suppliers on the basis of whether they are able to comply with the above policies, Mongolian labour code and anti-corruption, and EBRD PR 2.

The Construction Contractor will develop systems to promote responsible recruitment of migrant workers:

1. Work with suppliers to develop a specific policy prohibiting the practice of charging recruitment fees to migrant workers and communicate this to recruitment or manpower agents responsible for this.
2. Engage with authorities to identify any blacklisted contractor companies or recruitment agencies or brokers.
3. Require that migrant workers receive offer letters that are in a language they understand, and that recruitment agents to go through the letters with candidates to make sure they understand the Terms and Conditions (T&Cs).
4. Develop a system to collect information during the interview process, before migrant workers leave the home country, and a mechanism to gather feedback about the recruitment process once the worker has arrived in Mongolia.

Recruitment selection and hiring

The Construction Contractor will ensure that discrimination in relation to recruitment and employment on the grounds of race, gender, age, disability, sexual orientation, or religious or political beliefs is not permitted under any circumstances.

A **Recruitment and Selection Procedure** will be in place which will contain details of the recruitment process. This will include specific requirements for local resourcing; to minimise adverse effects on project affected persons and to maximise benefits locally, aimed at enhancing the chances for local community employment and local companies to win contracts where feasible. This should be prepared in liaison with the aimag and sum governors.

A **Hiring Procedure** will also be in place, which will comprise the following:

- identify project recruitment needs and staffing requirements;
- develop and review job descriptions in a standard template;
- post internal and external advertisements for available job vacancies;
- initial screening by the HR Manager where appropriate, or Project Manager or his designated person, to develop a shortlist of suitable candidates;
- conduct initial face-to-face interviews with short-listed candidates by the Project Manager, or their designated person or a selection committee;
- conduct follow-up interviews of candidates if required by the Project Manager, or their designated person or a selection committee, or HR Manager;
- skills and capability testing (where appropriate e.g. for Equipment drivers/operators, Systematic preliminary examination of CACES (Certificate of Aptitude to Safety Driving); for vehicle drivers, Systematic Defensive Driving Training, before starting work) and pre-employment medical checks if necessary) performing reference checks where references are available; and
- processing the Employment Contract for job placements.

Identifying labour needs

The following management measures will be put in place in relation to identifying labour needs:

- Forecasting workforce requirements in a systematic and timely fashion is important for the Project to ensure that sufficient time and internal resources are available to identify and find suitable local/regional candidates for all unskilled, semi-skilled and skilled positions.

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- Generating labour forecasts for the relevant positions. Drafting detailed job descriptions, identifying whether the vacancies are categorised as skilled, semi-skilled or unskilled, and specifying the number of personnel required and the expected duration of employment.
- A **Workforce Plan** will be developed and maintained to help forecast labour requirements and to undertake appropriate planning for the relevant recruitment and employment activities.

Informal hiring

The Construction Contractor will not permit informal approaches of hiring at any site or office and all recruitment will be managed through a formal process. To enforce this requirement, the Contractor will implement the following measures:

- The Construction Contractor will advertise in communities local to the sites to identify suitable candidates.
- There is no fee or payment involved when a candidate makes an application for a Project job.
- The Construction Contractor will not employ or work with any informal mediation individuals who claim to recruit the project workforce.
- The Construction Contractor will recruit solely from the designated recruitment mechanisms and not via informal requests, approaches or solicitations from community members, relatives of the currently employed personnel and other job seekers, at work sites.
- For specialist roles, professional recruitment firms may be used.

Local Hires

The Construction Contractor will recognise that it will be necessary to collaborate closely with both National Government and local and regional communities. The Project is committed through this Labour and Working Conditions Management Plan to define and develop measures to manage and maximise local hires by:

- Community engagement and disclosing local hiring policy: The Construction Contractor will work in cooperation with local communities on influx and other issues that arise. The Construction Contractor will implement a communications strategy as part of their community engagement process to inform widely on the rules and procedures for recruitment and employment with the Project. Awareness campaigns should continue throughout project construction to repeatedly inform the public of project recruitment procedures before speculative jobseekers decide to move to the area.
- Assist local authorities and communities in compiling lists of eligible workers and lists of skills with the aim of ensure as much local employments as possible during the construction phase.
- Assisting where appropriate and feasible with capacity-building for local communities to develop skills, products and other services that can be sourced locally.
- Maximising local content in employment and procurement practices and support regional economic development. Where local suppliers and enterprises are part of the Projects' supply chain, ensure that benefits derived from participation are long lasting and sustainable.
- Transparency in hiring: Employment opportunities will be advertised within the local communities and recruitment procedures will be fair and transparent. The local authorities should be informed of the hiring process.
- Local training: The Construction Contractor will be committed to facilitate local people in applying for positions, including providing on the job training for locally employed workers to better understand and cope with wage-based employment required for the construction activities.
- Worker education: The workforce will be sensitised to local social and cultural practices through provision of an induction course for all employees that stipulates expected behaviour.
- Spread and balance employment opportunities: Where possible, the Construction Contractor will balance selected employment across the aimag to spread and balance the positive impacts on local economies.
- The Construction Contractor will assist local law enforcement agencies responsible for crime prevention and enforcement, including information meetings and if appropriate and acceptable may provide support for carrying out increased patrolling in specified areas near project construction sites.

Outline Labour Management Plan

Information provision

Dissemination of all recruitment advertisements for the Project will be controlled by the Construction Contractor. Recruitment procedures in relation to information provision include the following:

- Vacancy advertisements must have appropriate approvals from the HR Manager.
- The Construction Contractor will ensure that relevant announcements are made for all available vacancies.
- Means of information distribution may include where available, advertising of employment opportunities in the local daily newspapers, online resources, local TV channels, local job centres, community notice boards, advertisements in local places of social gathering, town/village halls, and liaison with the local communities.
- The HR Manager is responsible for the international public distribution of vacancy announcements and provides advertising support for publication on the internet.
- Provision of information will also be managed through the CSEP with local communities in the project area of influence so that they are made aware of, and can respond to, vacancies when they arise.

Non-discrimination and equal opportunity

The Construction Contractor will not make employment decisions on the basis of personal characteristics unrelated to inherent job requirements. They will base the employment relationship on the principle of equal opportunity and fair treatment and will not discriminate with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices. The Construction Contractor will take measures to prevent and address harassment, intimidation, and/or exploitation. The principles of non-discrimination apply to migrant workers.

Special measures of protection or assistance to remedy past discrimination or selection for a role based on the inherent requirements of the job will not be deemed as discrimination, provided they are consistent with national law.

Terms of employment

The Construction Contractor will define categories of employees for its workforce. All recruitment information and employment contracts will specify an employee category and duration of the employment term.

Basic eligibility requirements for employment are likely to include:

- all applicants should complete an application form where they are able, detailing their applicable experience related to the minimum required and any desirable qualifications;
- applicants must be at least 18 years of age on the date of hiring for all positions or 16 years for non-hazardous positions;
- citizens convicted of a criminal act by a legal court and currently serving their sentences are not eligible for appointment;
- priority is given to Mongolian residents; and
- medical clearance if necessary, to be fit for work and role.

Procedures for verifying the age of relevant candidates will be implemented, including checks of personal identification documentation and birth certificates (or in the absence of such – applicable medical or registry records). No child or forced labour will be permitted.

Work contracts, working hours and vacation

Contracts of employment will be in writing and may be for a fixed or indefinite term. All employees will receive a copy of their contract of employment. Contracts of employment will include amongst others, details of the role and responsibilities, line manager, wages and salaries, working hours, remuneration for overtime, overtime limits per month, medical provisions, holiday entitlements, Labour Grievance Mechanism, freedom to join a union wherever permitted by law, notice periods and mechanisms for termination of employment.

Outline Labour Management Plan

Working hours will be in compliance with national legislation. All employment contracts may refer to other relevant HR documentation.

Wages

ILO standards deal with the issue of wage protection, Protection of Wages Convention (No. 95) and Recommendation (No. 85). They also deal with protection of workers' claims in case of their employer's bankruptcy or judicial liquidation: Protection of Workers' Claims (Employer's Insolvency) Convention (No. 173) and Recommendation (No. 180).

The Construction Contractor will pay rates of wages and observe conditions of labour in accordance with the Biwater Collective Agreement.

Records

The Construction Contractor will keep proper records of the time worked by every employee engaged on the project irrespective of the employee's method of payment (hourly or salary), the class of work on which employed and the wages paid. Proper records will for every employee engaged, their gender, the class of work in which employed, whether as a temporary or permanent employee, and the wages (and allowances if any), paid in accordance with Ivorian regulations will be kept. These records will be available at any time for inspection by authorized lender representative or authorized representative of the government. The Construction Contractor will produce, if required, other records that may be necessary to provide evidence of their compliance with these requirements.

Labour remuneration

All employees will be provided with a contract of employment that clearly sets out their wages or salary conditions and other allowances. They must be paid in accordance with this contract.

Alcohol and drugs

The Construction Contractor will not import, sell, give, barter or otherwise dispose of any alcoholic liquor or illegal drugs, or permit or suffer any such importation, sale, gift, barter or disposal by its employees, labour or contractors.

Festivals and religious customs

In all dealings with staff and labour, the Construction Contractor will have due regard to all recognised festivals, days of rest and religious or other customs. It is recognised that some form of construction activities will be required during these times and will be managed as described in the section on working hours.

Training

The Construction Contractor will develop a Worker Code of Conduct to govern the behaviour of all workers on site and in the local communities. This should cover *inter alia*: cultural awareness for workers coming from outside of the area, a drugs and alcohol policy with information about testing and penalties for contravention. The Worker Code of Conduct should promote an inclusive approach and address behaviour related to equal opportunity and non-discrimination based on personal characteristics (such as gender, race, nationality, ethnicity, origin, religion, disability, age or sexual orientation). The Worker Code of Conduct should have a zero tolerance for harassment and bullying.

Toolbox talks on labour law issues and the labour grievance mechanism will be held at least twice a year during construction.

The Construction Contractor will organise a training programme and maintain individual training registers for each construction worker which they can have at the end of contract for procuring future work.

Termination and retrenchment

All worker terminations will be performed strictly according to Construction Contractor policies, which will establish procedures to guide the retrenchment of employees should this process be required.

Retrenchment will be based on the principle of non-discrimination and will reflect Contractor consultation with workers, their organisations, and, where appropriate, the government, and comply with collective bargaining agreements if they exist. The Construction Contractor will comply with all legal and contractual requirements related to notification of public authorities, and provision of information to, and consultation with workers and their organisations.

Outline Labour Management Plan

The Construction Contractor will ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay and social security benefits and pension contributions and benefits will be paid (i) on or before termination of the working relationship to the workers, (ii) where appropriate, for the benefit of the workers, or (iii) payment will be made in accordance with a timeline agreed through a collective agreement. Evidence of any discretionary payments will be kept.

Collective redundancies

Any proposed collective redundancies shall be notified in advance to the MoE/PIU and the EBRD notified. Notification will include the reason for the proposed retrenchment, the expected number of workers affected, and the time frame.

Workforce demobilisation

The Construction Contractor will help the local workforce to transition from construction into the post-employment closure period, specifically to deal with the impacts of loss of employment.

The Contactor Project Manager or their designated person will, where feasible, work with government and private recruitment and training agencies if available to establish career transition or employee mitigation programmes to ease the impact of closure.

Workers' organisations

Mongolian law recognizes workers' rights to form and to join workers' organizations of their choosing without interference and to bargain collectively. With regard to workers' organisations the Construction Contractor shall comply with national law.

The Construction Contractor will not discourage workers from electing worker representatives, forming or joining workers' organizations of their choosing, or from bargaining collectively, and will not discriminate or retaliate against workers who participate, or seek to participate, in such organizations and collective bargaining. The Construction Contractor will engage with such workers' representatives and workers' organisations and provide them with information needed for meaningful negotiation in a timely manner. Workers' organizations are expected to fairly represent the workers in the workforce.

Unions and bargaining

In any collective bargaining, workers can be represented by this trade union.

Labour grievance mechanism

The Construction Contractor will implement a Labour Grievance Mechanism and will inform the workers of the Mechanism at the time of recruitment and make it easily accessible to them.

Protecting the work force

Child labour

It is unlikely that child labour will be an issue during the Project. However, to ensure conformance with EBRD PR2, the Construction Contractor will not employ children in any manner that is economically exploitative, or is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development. Certain types of work performed by children may be acceptable, but only when carried out in a manner that is both legal and safe.

The Construction Contractor will review the likelihood of the use of child or forced labour or the presence of occupational safety issues within their primary supply chain prior to engaging suppliers. The Construction Contractor will endeavour to work with service providers that have systems and procedures that comply with national laws. The Construction Contractor will not deal with companies where there are unacceptable risks. The Construction Contractor will audit their suppliers in accordance with Project policies and procedures to identify any new risks and will take appropriate actions to remedy any significant problems which may be discovered.

Forced labour

Outline Labour Management Plan

It is unlikely that forced labour will be an issue during construction of the Project. However, to ensure conformance with EBRD PR 2, the Construction Contractor will not employ forced labour, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This covers any kind of involuntary or compulsory labour, such as indentured labour, bonded labour, or similar labour-contracting arrangements. Also, the Construction Contractor will not employ trafficked persons.

Occupational Health and Safety

The Construction Contractor will develop and implement an OHS Plan and appoint a single point of final responsibility for health and safety on site. As part of the OHS Plan, the Construction Contractor will develop and use formal Permit to Work (PTW) system or equivalent to ensure that all potentially hazardous work is carried out safely and ensures effective authorization of designated work, effective communication of the work to be carried out including hazards involved, and safe isolation procedures to be followed before commencing work.

Occupational hazards to workers will be clearly explained to them when they receive their offer letters, and make clear to workers at induction and toolbox talks that they have the right to leave their work if they consider that there is a serious threat to their health.

Epidemics

In the event of any outbreak of illness of an epidemic nature, the Construction Contractor will comply with and carry out such regulations, orders and requirements as may be made by the Government, or the local medical or sanitary authorities, for the purpose of dealing with and overcoming the epidemic.

Third parties

The Construction Contractor will ascertain that any intermediaries that procure workers, are reputable and legitimate enterprises and have appropriate management systems to operate in a manner consistent with the requirements of EBRD PR 2. The Construction Contractor will monitor the performance of third party suppliers in relation to the requirements of EBRD PR 2. In addition, the Construction Contractor will incorporate these requirements in contractual agreements.

Workers engaged by third parties

Where there is a high risk of child labour or forced labour in the primary supply chain, the Construction Contractor will identify those risks consistent with EBRD PR 2. If child labour or forced labour cases are identified, the Construction Contractor will take appropriate steps to address them. The Construction Contractor will monitor their primary supply chain on an ongoing basis in order to identify any significant changes in its supply chain and if new risks or incidents of child and/or forced labour are identified, appropriate steps will be taken to remedy them.

Additionally, where there is a high risk of significant safety issues related to supply chain workers, the Construction Contractor will introduce procedures and mitigation measures to ensure that primary suppliers within the supply chain are taking steps to prevent or to correct life-threatening situations.

Where remedy is not possible, the Construction Contractor will shift the Project's primary supply chain over time to suppliers that can demonstrate that they are complying with EBRD PR 2.

Security

All security personnel should be required to undergo formal induction and special awareness training on Project risks and conduct requirements in relation to workers on the Project. Training will be reinforced through regular debriefings and performance reviews. This will include training in the use of force and in the applicable laws so that no contravention of national legislation takes place. Training will be provided to security personnel using the guiding principle that force shall not be used except in defence and in proportion with the nature and extent of the threat.

Training

Induction

A site induction will be held by the E&S and H&S Managers for all employees to ensure they are aware of the requirements of the CESMP, this Plan and Code of Conduct. This will be conducted in a quiet place / room conducive to ensuring everyone's undivided attention.

Project-wide training plan

Outline Labour Management Plan

A Training Plan will be developed for the Project by the Construction Project Manager in liaison with the HR Manager. Workforce training will be undertaken and coordinated through this Training Plan if practical.

Specialised training will be provided to those completing tasks with significant associated H&S risks. Specialised training should, where necessary, also be provided by external service providers for specific subject areas with these requirements being outlined in the Training Plan.

The following will be required:

- All employees shall attend routine toolbox briefings.
- Office based staff will be provided with, for example, on the job project management training and other job-specific training that may be required, as determined by the Construction Contractor.
- As part of the engagement process, worker qualifications and training records, where workers can provide them, will be gathered to help verify competency. These qualifications and records if any, and records of training provided during employment on the Project can be used to manage staff competency.

Job specific training

Specialised training will be provided to those completing tasks with significant associated E&S or H&S risks, with training programmes also being produced to meet the Construction Contractor's Health and Safety Policy. Specialised training should, where necessary, also be provided by external service providers for specific subject areas with these requirements being outlined in the Training Plan.

Monitoring programme and reporting

Monitoring

During construction, the Project Manager will monitor the following:

- Ensure that this Plan is being implemented by the HR Manager.

During construction, the HR Manager, or nominated person, will monitor the following:

- Implementation of this Plan - the Plan will be reviewed annually, and any necessary revisions made to reflect the changing circumstances or needs of the Contractor. The Labour Management Plan may also be updated on an 'as required' basis at any time.
- Non-compliances; and corrective actions.
- Number and type of recorded labour grievances, Grievance Forms and Grievance Log and report these to the Contractor Project Manager and HSE Supervisor.

During construction, the E&S and H&S Managers will:

- Carry out a daily site walkover to understand whether the measures identified in this Plan are being implemented. This will be recorded in the Daily Site Log.
- Undertake a more detailed monthly inspection and results will be recorded in the Monthly Checklists.
- Record and report any non-compliances; and corrective actions required from site monitoring.
- Report on the results of the above to the HSE Manager, for inclusion in monthly HSE reporting.

Key Performance Indicators (KPIs)

Key Performance Indicators (KPI) are quantitative or qualitative measurements used to measure performance over time. They can be used to evaluate the effectiveness of control measures and demonstrate performance improvements during steady state operations. The number and nature of complaints is addressed under the Labour Grievance Mechanism in the next section. Indicative KPIs are provided in the table below.

ID	KPI	Target / Action Threshold	Means of verification
LWC01	Instances of non-compliance with the requirements of this construction management plan	Minimization and continued improvement	Non-conformance and Corrective Action Register

Outline Labour Management Plan

ID	KPI	Target / Action Threshold	Means of verification
LWC02	Number of reportable breaches of worker Code of Conduct	Minimization and continued improvement	Non-conformance and Corrective Action Register
LWC03	Number of worker grievances received related to discrimination	Minimization and continued improvement	Labour grievance Log
LWC04	Number of calendar days within which responses are addressed and resolved	Efficiency and continued improvement	Labour grievance Log
LWC05	Proportion of workers interviewed that know about the grievance mechanism and can explain how to use it	Continued improvement	E&S/H&S Daily Site Log and Monthly Checklists
LWC06	Number of contracts in place versus number of workers employed	100%	Contracts of employment
LWC07	Number of workers reporting that they had paid recruitment fees to secure the job – through complaints and interviews	Minimization and continued improvement	Labour grievance Log
LWC08	Number of staff having received training	Continued improvement	Training records
LWC09	Number of workers that have received an induction / information on their workplace rights	Continued improvement	Training records
LWC10	Proportion of workers interviewed that understand their workplace rights	Continued improvement	E&S/H&S Daily Site Log and Monthly Checklists
LWC11	Percentage of persons having undergone and passed a background screening from the Contractor	Continued improvement	HR policies and procedures
LWC12	Number of reported incidences of breaches of labour issues by security personnel	Minimization and continued improvement	Non-conformance and Corrective Action Register / Grievance Mechanism

Reporting

Records will be kept of:

- HR policies and procedures, including the Recruitment and Selection Procedure and Hiring Policy and Procedure (HR Manager)
- Code of Conduct (HR Manager)
- Collective Agreement (HR Manager)
- Workforce Plan (HR Manager)
- Contracts of employment (HR Manager)
- Labour Grievances Log and Forms (HR Manager)
- Training Plan (HR Manager)

Outline Labour Management Plan

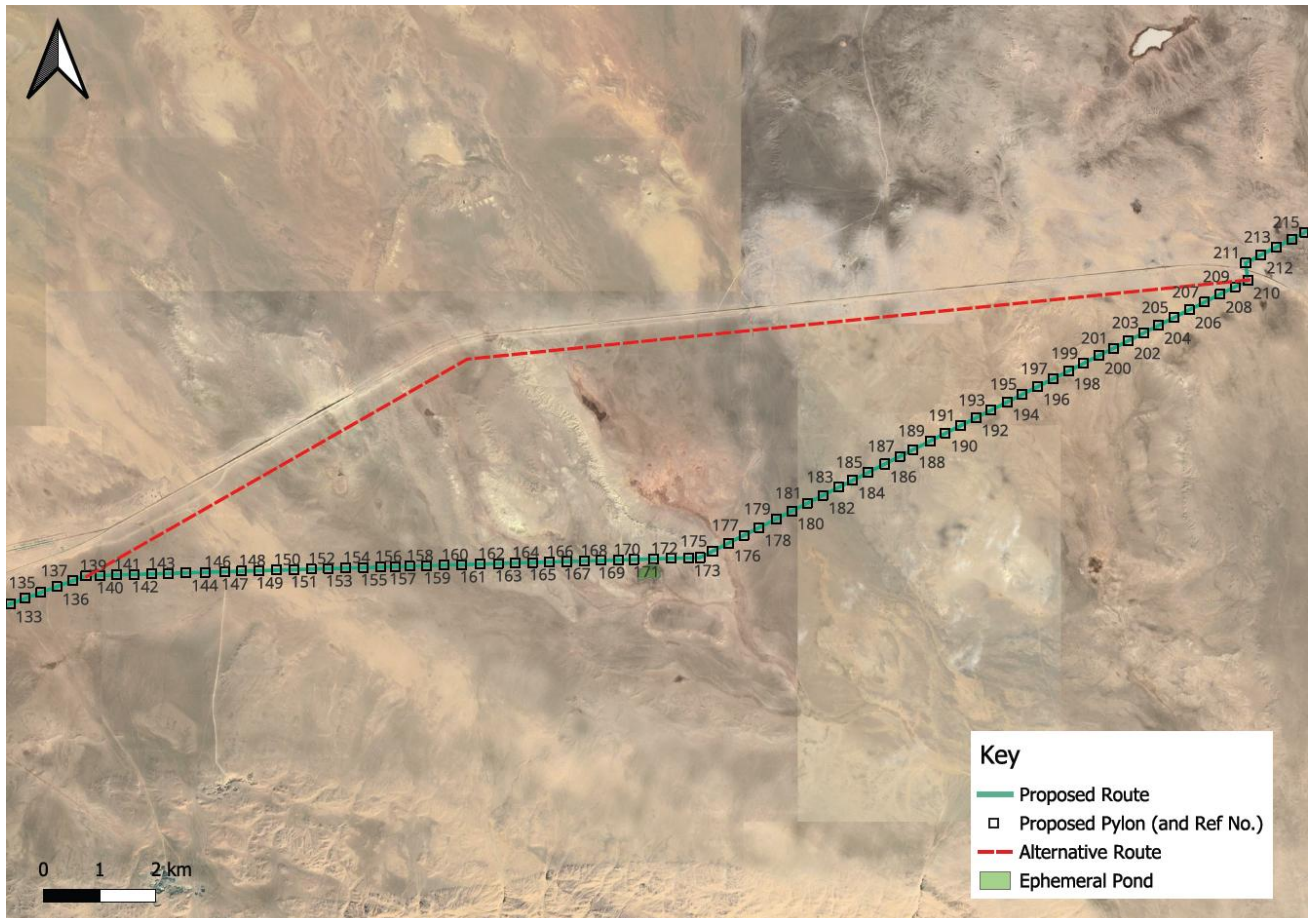
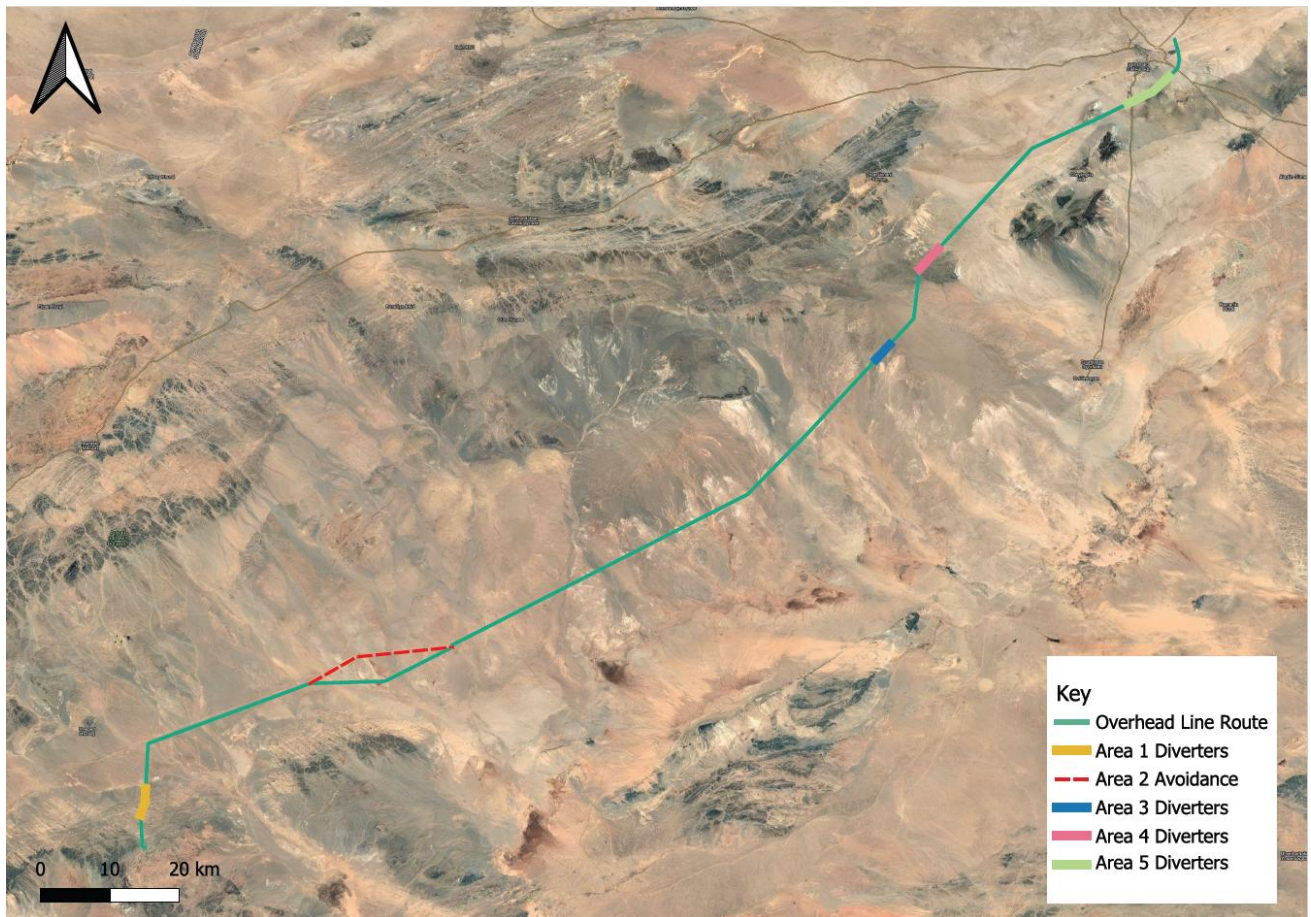
- E&S and H&S Daily Site Log and Monthly Checklists (E&S and H&S Managers)
- Non-conformance and Corrective Action Form (E&S and H&S Managers)
- Non-conformance and Corrective Action Register (E&S and H&S Managers)

Recommended Route Adjustment

Appendix F

Recommended Route Adjustment

Recommended Route Adjustment

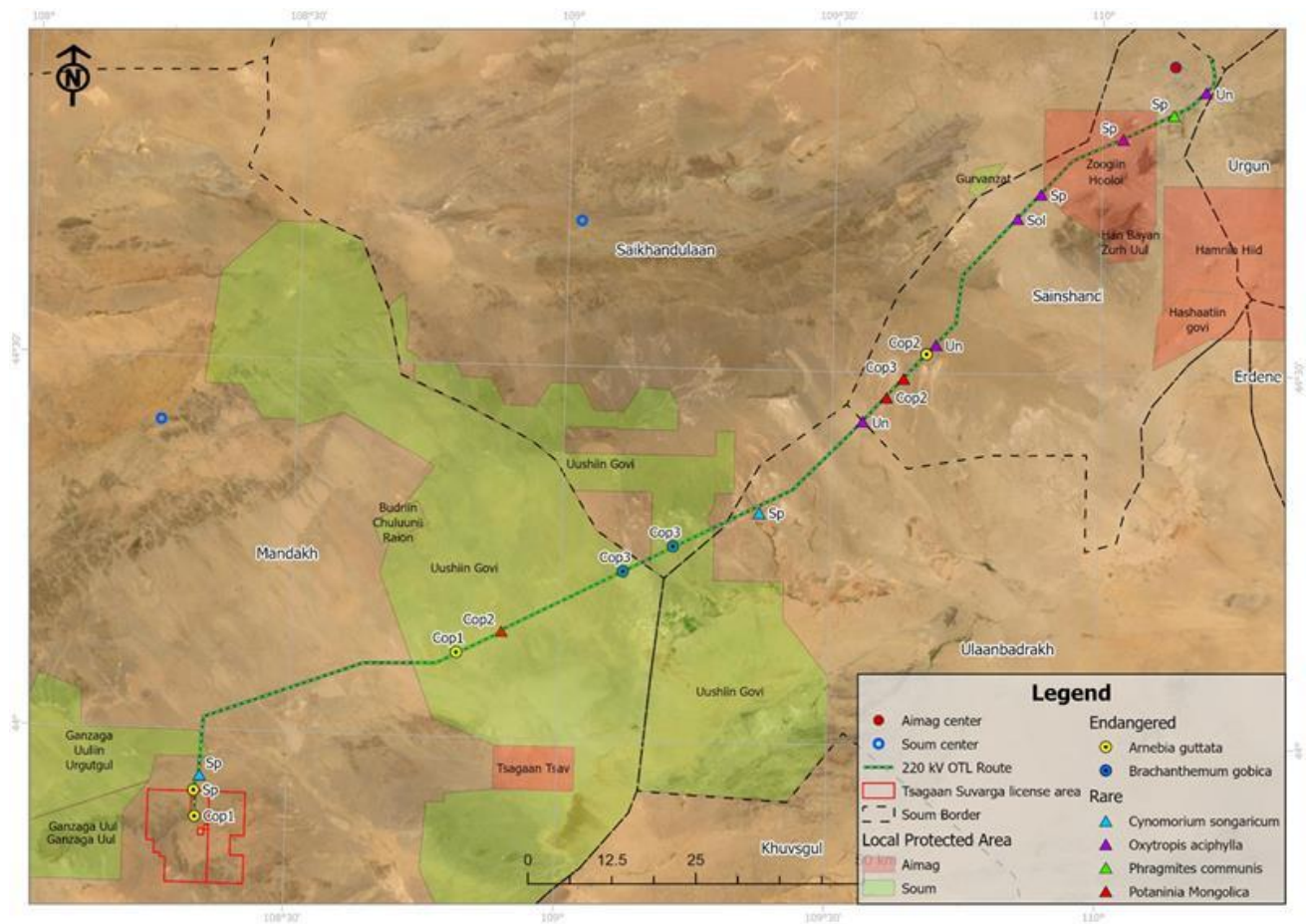


Ecological Areas to Avoid

Appendix G

Ecological Areas to Avoid

Ecological Areas to Avoid



Ecological Areas to avoid during construction

Cultural Heritage Sites to Avoid

Appendix H

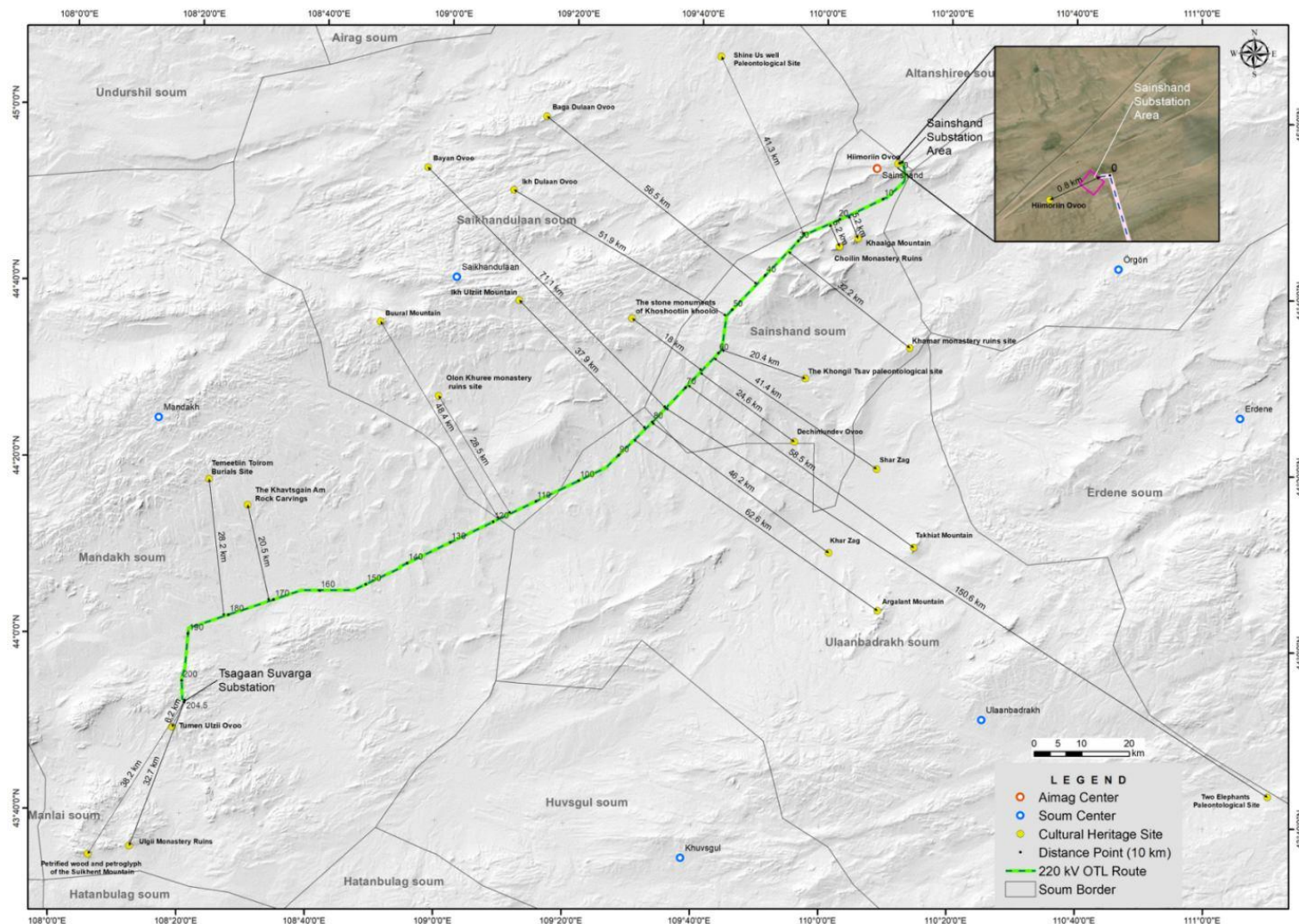
Cultural Heritage Sites to Avoid

Cultural Heritage Sites to Avoid

Archaeological Sites and Monuments in the wider region around the Project Site

No.	Soums	Archaeological Site and Monument Name	Approximate Distance from Project (km)
AM07	Sainshand	Khiimoriin Ovoo	0.8
-	Sainshand	Choilin Mountain and Monastery	5.2
-	Sainshand	Khaalga Mountain	5.2
AM08	Mandakh	Tumen Ulzii Ovoo	6.2
AM04	Saikhandulaan	The stone monuments of Khoshootiin Khooloi	18
AM02	Mandakh	The Khavtsgain Am rock carvings	20.5
AM06	Sainshand	The Khongil Tsav paleontological site	20.4
-	Sainshand	Dechinlundeov ovoo	24.6
AM01	Mandakh	Temeetiin toirom burials site	28.2
AM03	Saikhandulaan	Olon Khuree Monastery ruins site	28.5
	Saihandulaan	Baga Dulaan Ovoo	56.5
-	Mandakh	Ulgii Monastery Ruins	32.7
AM05	Sainshand	Khamar Monastery ruins site	32.2
-	Saihandulaan	Ikh Ulziit Mountain	37.9
-	Mandakh	Petrified wood and petroglyph of the Suikhent Mountain	38.2
-	Saihandulaan	The Shine Us Well palaeontological site	41.3
-	Ulaanbadrakh	Shar Zag	41.4
-	Saihandulaan	Buural Mountain/Zagal Ovoo	48.4
-	Saihandulaan	Ikh Dulaan ovoo	51.9
-	Ulaanbadrakh	Takhiat Mountain	58.5
-	Ulaanbadrakh	Argalant Mountain	62.6
-	Saihandulaan	Bayan ovoo	71.1

Cultural Heritage Sites to Avoid



Map of Cultural Heritage Sites Near Project Route

Appendix I

Construction Workers' Accommodation Checklist

Construction Workers' Accommodation Checklist

Topic	Y	N	Comments
General Regulatory Framework			
Have the international/national/local regulatory frameworks been reviewed?			
Are mandatory provisions on workers' accommodation identified?			
Assessing the need for workers' accommodation			
Availability of Workforce			
Has there been an assessment of workers' availability in the neighbouring communities?			
Has there been an assessment of the skills and competencies of the local workforce and how do those skills and competencies fit the project's need?			
Has there been an assessment of the possibility of training a local workforce in order to fulfil the project's needs?			
Availability of housing			
Has there been a comprehensive assessment of the different type of housing available in the surrounding communities prior to building any workers' accommodation?			
Has there been an assessment of the impact on the communities of using existing housing opportunities?			
Have measures to mitigate adverse impacts on the local housing market been identified and included in the Environmental and Social Action Plan (ESAP) or other relevant action plan?			
Assessing impacts of workers' accommodation on communities			

Topic	Y	N	Comments
Has a community impact assessment been carried out as part of the Environmental and Social Assessment of the overall project with a view to mitigate the negative impacts of the workers' accommodation on the surrounding communities and to enhance the positive ones?			
Have the potential health and safety impacts and consequences of land acquisition and involuntary resettlement occurring during the construction phase of the workers' accommodation been included in the assessment?			
Have the impacts of workers' accommodation on community infrastructures, services and facilities been included in the assessment?			
Have the impacts on local community's businesses and local employment been included in the assessment?			
Have general impacts of workers' accommodation on communities' health, (notably the increased risk of road accidents and of communicable diseases), and community social cohesion been included in the assessment?			
Does the assessment include appropriate mitigation measures to address any adverse impacts identified?			
Types of workers' accommodation			
Has consideration been given to provision of family accommodation?			
Are individual accommodations comprising bedrooms, sanitary and cooking facilities provided as part of the family accommodation?			
Are adequate nursery/school facilities provided?			
Is special attention paid to providing adequate safety for children?			
Standards for workers' accommodation			

Topic	Y	N	Comments
National/local standards			
Have the relevant national/local regulations been identified and implemented?			
General Living Facilities			
Is the location of the facilities designed to avoid flooding or other natural hazards?			
Are the living facilities located within a reasonable distance from the worksite?			
Is transport provided to worksite safe and free?			
Are the living facilities built using adequate materials, kept in good repair and kept clean and free from rubbish and other refuse?			
Drainage			
Is the site adequately drained?			
Heating, air conditioning, ventilation and light			
Depending on climate are living facilities provided with adequate heating, ventilation, air conditioning and light systems including emergency lighting?			
Water			
Do workers have easy access to a supply of clean/potable water in adequate quantities?			
Does the quality of the water comply with national/local requirements or WHO standards?			
Are tanks used for the storage of drinking water constructed and covered to prevent water stored therein from becoming polluted or contaminated?			
Is the quality of the drinking water regularly monitored?			
Wastewater and solid waste			
Are wastewater, sewage, food and any other waste materials adequately discharged in compliance with local or World Bank standards and without causing any significant			

Topic	Y	N	Comments
impacts on camp residents, the environment or surrounding communities?			
Are specific containers for rubbish collection provided and emptied on a regular basis?			
Are pest extermination, vector control and disinfection undertaken throughout the living facilities?			
Rooms/dormitories facilities			
Are the rooms/dormitories kept in good condition?			
Are the rooms/dormitories aired and cleaned at regular intervals?			
Are the rooms/dormitories built with easily cleanable flooring material?			
Are the rooms/dormitories and sanitary facilities located in the same buildings?			
Are residents provided with enough space?			
Is the ceiling height high enough?			
Is the number of workers sharing the same room/dormitory minimised?			
Are the doors and windows lockable and provided with mosquito screens when necessary?			
Are mobile partitions or curtains provided?			
Is suitable furniture such as table, chair, mirror, bedside light provided for every worker?			
Are separate sleeping areas provided for men and women?			
Bed arrangements and storage facilities			
Is there a separate bed provided for every worker?			
Is the practice of "hot-bedding" prohibited?			
Is there a minimum space of 1 metre between beds?			
Is the use of double deck bunks minimised?			

Topic	Y	N	Comments
When double deck bunks are in use, is there enough clear space between the lower and upper bunk of the bed?			
Are triple deck bunks prohibited?			
Are workers provided with comfortable mattresses, pillows and clean bed linens?			
Are the bed linen washed frequently and applied with adequate repellents and disinfectants (where conditions warrant)?			
Are adequate facilities for the storage of personal belongings provided?			
Are there separate storages for work clothes and PPE and depending on condition, drying/airing areas?			
Sanitary and toilet facilities			
Are sanitary and toilet facilities constructed from materials that are easily cleanable?			
Are sanitary and toilet facilities cleaned frequently and kept in working condition?			
Are toilets, showers/bathrooms and other sanitary facilities designed to provide workers with adequate privacy including ceiling to floor partitions and lockable doors?			
Are separate sanitary and toilet facilities provided for men and women?			
Is there an adequate number of toilets and urinals?			
Are toilet facilities conveniently located and easily accessible?			
Showers/bathrooms and other sanitary facilities			
Is the shower flooring made of anti-slip hard washable materials?			
Is there an adequate number of hand wash basins and showers/bathrooms facilities provided?			
Are the sanitary facilities conveniently located?			

Topic	Y	N	Comments
Are shower facilities provided with an adequate supply of cold and hot running water?			
Canteen, cooking and laundry facilities			
Are canteen, cooking and laundry facilities built with adequate and easy to clean materials?			
Are the canteen, cooking and laundry facilities kept in clean and sanitary condition?			
If workers cook their own meals, is kitchen space provided separately from the sleeping areas?			
Are places for food preparation adequately ventilated and equipped?			
Are kitchen floor, ceiling and wall surfaces adjacent to or above food preparation and cooking areas built in non-absorbent, durable, non-toxic, easily cleanable materials?			
Are wall surfaces adjacent to cooking areas made of fire resistant materials and food preparation tables equipped with a smooth, durable, noncorrosive, non-toxic, washable surface?			
Are adequate facilities for cleaning, disinfecting and storage of cooking utensils and equipment provided?			
Are there adequate sealable containers to deposit food waste and other refuse? Is refuse frequently removed from the kitchen to avoid accumulation?			
Standards for nutrition and food safety			
Is there a special sanitary process such as the WHO "5 keys to safer food" implemented in relation to food safety?			
Does the food provided contain appropriate nutritional value?			
Does the food provided take into account workers' religious/cultural backgrounds?			

Topic	Y	N	Comments
Medical facilities			
Are first aid kits provided in adequate numbers?			
Are first-aid kits adequately stocked?			
Is there an adequate number of staff/workers trained to provide first aid?			
Are there any other medical facilities/services provided on site? If not, why?			
Are there any other medical facilities/services provided on site? If not, why?			
Are basic social collective spaces and adequate recreational areas provided to workers?			
Are workers provided with dedicated places for religious observance?			
Can workers access a telephone at an affordable/public price?			
Are workers provided with access to internet facilities?			
Management and staff			
Are there carefully designed worker camp management plans and policies especially in the field of health and safety (including emergency responses), security, workers' rights and relationships with the communities?			
Where contractors are used, have they clear contractual management responsibilities and duty to report?			
Does the person appointed to manage the accommodation have the required background, competency and experience to conduct his mission and is he/ she provided with the adequate responsibility and authority to do so?			
Is there enough staff to ensure the adequate implementation of housing standards (cleaning, cooking and security in particular)?			

Topic	Y	N	Comments
Are staff members recruited from surrounding communities?			
Have the staff received basic health and safety training?			
Are the persons in charge of the kitchen particularly trained in nutrition and food handling and adequately supervised?			
Charging fees for accommodation and services			
Are the renting arrangements fair and transparent?			
Are workers provided with adequate information about payment made?			
Where appropriate, are renting arrangements and regulations clearly included in workers' employment contracts?			
Are food and other services provided for free or reasonably priced, that is, not above the local market price?			
Is the payment in kind for accommodation and services prohibited?			
Health and safety on site			
Have health and safety management plans including electrical, mechanical, structural and food safety been designed and implemented?			
Has the accommodation manager a duty to report to the health authority specific diseases, food poisoning or casualties?			
Is there an adequate number of staff/workers trained in providing first aid?			
Has a specific and adequate fire safety management plan been designed and implemented?			
Is guidance on alcohol, drug and HIV/AIDS and other health risk-related activities provided to workers?			

Topic	Y	N	Comments
Are contraception measures (condoms in particular) and mosquito nets (where relevant) provided to workers?			
Do workers have an easy access to medical facilities and medical staff, including female doctors/nurses where appropriate?			
Have emergency plans on health and fire safety been prepared?			
Depending on circumstances, have specific emergency plans (earthquakes, floods, tornadoes) been prepared?			
Security on workers' accommodation			
Has a security plan including clear measures to protect workers against theft and attack been designed and implemented?			
Has a security plan including clear provisions on the use of force been designed and implemented?			
Have the backgrounds of security staff been checked for previous crimes or abuses?			
Has the recruitment of security staff from both genders been considered?			
Have security staff received clear instruction about their duty and responsibility?			
Have security staff been adequately trained in dealing with domestic violence and the use of force?			
Are body searches only performed in exceptional circumstances by specifically trained security staff of both genders?			
Do security staff have a good understanding about the importance of respecting workers' rights and the rights of the surrounding communities and adopt appropriate conduct?			
Do workers and communities have specific means to raise concerns about security arrangements and staff?			
Workers' rights, rules and regulations on workers' accommodation			

Topic	Y	N	Comments
Are limitations on workers' freedom of movement limited and justified?			
Is an adequate transport system to the surrounding communities provided?			
Is the practice of withholding workers' ID papers prohibited?			
Is freedom of association expressly respected?			
Are workers' religious, cultural and social backgrounds respected?			
Are workers made aware of their rights and obligations and provided with a copy of the accommodations' internal rules, procedures and sanction mechanisms in a language or through a media they understand?			
Are house regulations non discriminatory, fair and reasonable?			
Are regulations on alcohol, tobacco and third parties' access to the camp clear and communicated to workers?			
Is a fair and non-discriminatory procedure to implement disciplinary procedures, including the right for workers to defend themselves, set up?			
Consultation and grievance mechanisms			
Have mechanisms for workers' consultation been designed and implemented?			
Are workers provided with processes and mechanisms to articulate their grievances in accordance with PR2?			
Have workers subjected to disciplinary proceedings arising from conduct in the accommodation had access to a fair and transparent hearing with the possibility to appeal the decision?			
Are there fair conflict resolution mechanisms in place?			

Topic	Y	N	Comments
In cases where serious offences occur, are there mechanisms to ensure full cooperation with police authorities?			
Management of community relations			
Have community relation management plans addressing issues around community development, community needs, community health and safety and community social and cultural cohesion been designed and implemented?			
Do community relation management plans include the setting up of liaison mechanisms to allow a constant exchange of information and consultation of the surrounding communities?			
Is there a senior manager in charge of implementing the community relation management plan?			
Is there a senior manager in charge of liaising with the surrounding communities?			
Are the impacts generated by workers' accommodation periodically reviewed, mitigated or enhanced?			
Are community representatives provided with easy means to voice their opinions and lodge complaints?			
Is there a transparent and efficient process for dealing with community grievances, in accordance with PR10?			



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