

ENVIRONMENTAL AND SOCIAL ACTION PLAN

No.	Action	Environmental & Social Impacts	Requirements	Resources & responsibilities	Timeframe	Performance criteria	Status
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	ESAP Manager: Designate a person in charge of implementing the ESAP	Environmental and social monitoring	EBRD PR1 IFC PS1	Developer	Following signature of the funding agreement with EBRD, and for the entire lifespan of the agreement	Official appointed for the entire duration of the funding agreement (the individual may change, but the role is to be maintained as is)	
1.2	Environmental and Social Monitoring Report Report to the EBRD, commercial lenders as well as their consultant regarding: <ul style="list-style-type: none">Implementation of the Project's ESAPEnvironmental and social performance having regard to the Project's activities	Environmental and social monitoring	EBRD PR1 IFC PS1 Funding agreement	Developer Format of the annual report to be transmitted by EBRD	Construction: every six months Operation: by the end of the first quarter of each year for the entire duration of the funding agreement	Reports (covering any shutdown instances) submitted and approved by EBRD, commercial lenders as well as their consultant.	

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1.3	<p>Environmental and Social Management System (ESMS)</p> <p>Develop and implement an integrated Health, Safety, Environment and Social Management Plan (HSES) in accordance with the national regulatory requirements, the EBRD PR1 and international standards</p> <p>The HSES requirements were shared with the EPC Contractor in 2020. The HSES will be updated at the beginning of the operation phase.</p> <p>Pursuant to the Project's HSES, develop and implement plans and procedures for managing the specific environmental or social aspects.</p> <p>Such plans include (non-exhaustive list): an Environmental and Social Management Plan, a stakeholder engagement plan, Human Resources Policies, a Biodiversity Action Plan, a Land Acquisition Plan. This will also include avifauna monitoring and shut down on demand as needed.</p> <p>Those plans will be updated at the beginning of the operation phase.</p> <p>The plans will include performance requirements as well as reporting and monitoring requirements and include the EPC Contractor's obligations at the termination of its contract.</p>	Quality assurance and continuous improvement	<p>Moroccan Law</p> <p>EBRD PR1</p> <p>IFC PS1</p>	Developer	<p>Before work starts on site</p> <p>Updated before the operation phase</p>	<p>Demonstration of the implementation of an Environmental and Social Management System for the construction phase.</p> <p>Demonstration of the implementation of plans and procedures</p>	
1.4	<p>Change management procedure</p> <p>Ensure that the data generated from the various studies (avifauna, geotechnical study) or that changes, planned or unplanned, with a direct or indirect impact, require:</p> <ul style="list-style-type: none"> Reassessment of the environmental, social, health and safety hazards, Reassessment of the preventative and mitigation measures defined to minimise the impacts associated with the risks identified, Communication with the stakeholders concerned, including the EBRD 	Quality assurance and continuous improvement	<p>EBRD PR1</p> <p>IFC PS1</p>	<p>Developer</p> <p>EPC Contractor</p>	<p>From the completion of the studies conducted prior to the start of the works on site until the end of all phases of the Project</p>	<p>Assessment of risks relating to amendment and review of the Project documentation</p> <p>Communication with the EBRD and all stakeholders concerned</p>	

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1.5	<p>Environmental and Social Management and Monitoring Plan (ESMMP) during the construction phase</p> <p>Develop and implement an ESMMP by the Environment, Social and Health & Safety managers during the construction phase. The ESMMP is to comprise performance requirements, as well as requirements on reporting and monitoring. It is to be aligned with the Developer's ESMS requirements (see Action 1.3).</p> <p>The ESMMP is to be updated at the beginning of the operation phase (Environmental and Social Management and Monitoring Plan (ESMMP) during the Operation Phase).</p>	Implementation of the regulatory requirements	<p>Moroccan Law</p> <p>EBRD PR1 IFC PS1</p>	<p>EPC Contractor</p> <p>Approval by the Developer</p>	<p>ESMMP prepared by the EPC Contractor and validated by the Developer, EBRD, commercial lenders as well as their consultant before work starts on site</p> <p>Updated before the operation phase</p>	<p>ESMMP submitted and approved by EBRD, commercial lenders as well as their consultant</p> <p>Demonstration of implementation of the ESMMP</p>	
1.6	<p>Environmental and Social Management during the construction phase</p> <p>Within the monitoring team, assign the following managers who are to report directly to the Project Manager:</p> <ul style="list-style-type: none"> An “Environment” manager in charge of ensuring compliance with Moroccan environmental laws (including environmental recommendations of the ESIA and contractual specifications) and implementation of the ESAP (PR1, PR3 and PR6) A “Social” manager in charge of ensuring compliance with Moroccan laws, the ESIA social recommendations and the contractual specifications, as well as implementation of the ESAP (PR2, PR5, PR8 and PR10). The Social manager will be assisted by a community liaison officer who will act as a facilitator vis-à-vis the local population A “Health & Safety” manager in charge of ensuring compliance with Morocco's laws in regard to health & safety (including the ESIA recommendations and contractual specifications), as well as implementation of the ESAP (PR4) <p>One person can undertake several responsibilities</p>	Compliance with the regulatory requirements and the ESAP	<p>Moroccan Law</p> <p>EBRD PR1 IFC PS1</p>	Staff hired by the developer (these duties cannot be outsourced) and allocated resources	Prior to start of work at the site	Appointing managers and retaining them until the end of the construction phase	

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1.7	<p>Environmental and Social Management during the construction phase</p> <p>Put in place a system for monitoring the Project's environmental and social performance, at three levels:</p> <ul style="list-style-type: none"> - The EBRD team (by an independent consultant hired by the SPV) in charge of external monitoring - The Developer's monitoring team - a team in charge of monitoring within the EPC Contractor team <p>Before work starts at the site, the Developer shall ensure that Project's monitoring staff is adequately organised in terms of competencies and the number of staff assigned to monitoring workers' health and safety, environmental protection, societal aspects and implementation of the ESMS of the plans and associated procedures relating.</p> <p>The independent consultant will have to report and answer (duty of care) to the lenders.</p>	Quality assurance and continuous improvement	EBRD PR1 IFC PS1	EBRD Developer EPC Contractor	<p>Before work starts at the site</p> <p>Monitoring during the construction phase</p> <p>Non-objection of EBRD to the terms of reference and the choice of the independent consultant (Lenders Environmental and Social Advisor for punctual audits) hired by the SPV, for a minimum of 3 years (one audit per year) to monitor proper implementation of the ESAP and the overall performance of the Project's E&S.</p> <p>The need to continue with the monitoring by the independent consultant hired by the SPV is to be re-assessed by EBRD after 3 years.</p> <p>Independent Advisor to submit reports to the SPV and EBRD</p>	<p>Established monitoring system</p> <p>Full organisational chart with names and responsibilities/roles</p> <p>Follow-up reports</p> <p>Training records</p>	
1.8	<p>Plan for dismantling existing wind farm</p> <p>Develop and implement a Plan for dismantling the wind farm. The plan must lay out details on how to deal with environmental or social aspects specifically relating to this phase, including the specific measures envisaged for handling hazardous materials and waste (with the clear objective of optimum reuse/recycling of the dismantled equipment and its components)</p>	<p>Implementation of the regulatory requirements</p> <p>Circular economy</p>	<p>Moroccan Law</p> <p>EBRD PR1 IFC PS1</p>	<p>EPC Contractor</p> <p>Approval by the Developer and EBRD</p>	<p>HHSE Plan dealing with the E&S aspects, including waste materials emanating from the dismantling of the existing wind farm prepared by the EPC Contractor in accordance with the EPC Contract and validated by the Developer prior to the start of work at the site</p>	<p>Demonstration of implementation of the plan for dismantling of the existing wind farm</p>	

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1.9	<p>The Company will appoint a qualified Independent Ornithological (for bird and bat) Expert (IOE) on a non-objection basis by the Lenders on personnel and Terms of Reference, to provide independent expert advice on the seasonal bird and bat activity and carcass monitoring reports and provide input as per the active turbine management strategy of the Project. When needed, the IOE will immediately inform the control room operator to shut down on demand, and record this. The responsibility of the shut-down, based on this request, is for the operator.</p> <p>The IOE will be appointed by the Company up to the Project loan duration. The expert will be employed during the migration periods (and have adequate experience). The IOE scope will be reviewed with the Lenders every 3 years.</p> <p>Field monitoring data at post-construction will verify the performance of the shut-down on demand for adaptive management to take place and will inform on the requirement of additional measures to be implemented, if necessary.</p>	Minimize impacts to birds and bats	EBRD PR6 Best practice.	Responsibility: Project Company	<p>IOE appointed before start of operation phase</p> <p>IOE to be in place up to the Project loan duration</p>	<p>IOE appointed (two IOEs on site at same time during migration period)</p> <p>Lenders to sign off on non-objection basis,</p> <p>SPV to provide Final report of the IOE to Lenders every 6 months, including summary of action and recommendations</p>	
PR2	Labour and Working Conditions						
2.1	<p>Human Resources Policy</p> <p>Prepare and ensure accessibility to all Koudia SPV staff at all times to a document on "Human Resource Policys" in accordance with the sponsors' E&S policies and EBRD's PR2, and including:</p> <ul style="list-style-type: none"> equitable treatment, sexual harassment, non-discrimination and equal opportunities for all employees, male and female; the right to membership of labour organisations; non-use of forced labour and child labour. <p>It is to be published/circulated in the languages understood by the workers</p>	Transparency and conformity of human resources management	<p>Moroccan Law (Labour Code)</p> <p>EBRD PR2 IFC PS2</p>	Developer	Before work starts at the site	"Human Resources" policy accessible to SPV staff	

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2.2	Human Resources of the EPC Contractor and its sub-contractors Require from the EPC contractor involved in the Project, <ul style="list-style-type: none"> The management of its human resources in compliance with Moroccan Law and with the PR2 of the EBRD's E&S policy Preparation of a human resources management plan for the construction phase, including: <ul style="list-style-type: none"> ✓ The terms and conditions of local employees' contracts, ✓ Working conditions, ✓ Workers accommodation conditions, and, where applicable, catering. 	Preventing the risks associated with the presence of a large number of workers	Moroccan Law EBRD PR2 IFC PS2	EPC Contractor Approval by the Developer	EPC Contractor's Human Resources management plan validated by the Developer prior to commencement of construction at the site	Human resources management plan	
2.3	Management of the EPC and its sub-contractors Ensure that the EPC Contractor honours the commitments, policies, management plans and Project standards in accordance with its contract. Require the EPC Contractor involved in Project to ensure that the commitments, policies, management plans and Project standards also apply to its sub-contractors (including its service providers and suppliers) that are involved in the Project.	Preventing risks inherent to the presence of a large number of workers	Moroccan Law EBRD PR2 IFC PS2	Developer	Prior to construction works at the site and as it progresses	Record of inspections of the EPC Contractor by the Developer, and defined remedial action E&S requirements applied by the EPC Contractor to its own sub-contractors (including its service providers and suppliers) Record of inspections conducted by the EPC Contractor of its sub-contractors, as well as any defined remedial action	
2.4	Workers' accommodation on the Project premises Ensure that the EPC Contractor has in place an adequate housing arrangement for the workers, in accordance with the EBRD/IFC directives on <i>Workers' Accommodation: Processes and Standards</i> , in case providing workers with accommodation on Project premises is necessary	Preventing risks pertaining to workers' accommodation	EBRD PR2 IFC PS2	EPC Contractor Approval by the Developer	EPC Contractor's workers' accommodation plan as validated by the Developer prior to construction works the site	Workers' accommodation plan Workers' accommodation in compliance with EBRD/IFC directives	

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2.5	<p>Recruiting</p> <p>Develop and implement a recruiting policy in accordance with the EPC contract</p> <p>To the extent possible, priority for any recruiting (regular or technical staff), must be given to locally available human resources.</p> <p>Develop and implement a Skills Development Plan comprising training and skills enhancement for local workers in accordance with the EPC contract</p>	Favourable action benefitting the local population and prevention of conflicts associated with the presence of a local workforce.	<p>Moroccan Law</p> <p>EBRD PR2 IFC PS2</p>	<p>EPC Contractor</p> <p>Approval by the Developer</p>	Recruiting policy prepared by the EPC Contractor and validated by the Developer prior to construction works on site until the Project comes to a close	<p>Recruiting policy</p> <p>Number of local workers</p> <p>Record of training for local workers</p>	
2.6	<p>Security and guard personnel:</p> <p>Before hiring security and guard personnel (be it directly or through a staffing service), develop and implement a Security Management Plan in accordance with the voluntary principles on security and human rights and a code of conduct.</p> <p>Stipulate and implement measures on management of security personnel: checking, ensuring proper use of the force, training on human rights, proper equipment and surveillance.</p>	Anticipation and prevention of risks facing security personnel	<p>EBRD PR2 IFC PS4</p> <p>Voluntary principles on security and human rights</p>	<p>Developer</p> <p>EPC Contractor</p>	Security management plan prepared by the EPC Contractor and validated by the Developer prior to construction works on site	<p>Demonstration of implementation of the security management plan</p> <p>Training records</p>	
2.7	<p>Safeguarding the rights of the EPC Contractor's staff after termination of service</p> <p>Pursuant to the EPC contract, develop and implement a Staff Reduction Plan setting out the process to follow as regards layoffs and the measures required under the IFC guidelines on <i>Good Practice Note Managing Retrenchment</i>.</p> <p>Regularise the situation of workers (end of contract and/or fixed-term contract) in accordance with the regulations in place.</p> <p>Issue employees with attestations enabling them to seek employment at a new wind farm or another project.</p> <p>Give workers due notice (according to the regulations in place) as to the timing of termination of the project and/or their contract.</p>	Conflict prevention	<p>Moroccan Law</p> <p>EBRD PR2 IFC PS2</p>	<p>EPC Contractor</p> <p>Approval by the Developer</p>	Staff reduction plan prepared by the EPC Contractor in accordance with the EPC contract and validated by the Developer prior to completion of construction of the wind farm and a power line, and in the event of a termination or end of assignment.	<p>Demonstration of proper implementation of the Staff Reduction Plan</p> <p>Communications to the employees</p>	

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2.8	Grievances Implement grievance mechanism which must be accessible to the Developer's employees, the EPC Contractor and its sub-contractors. Inform the staff of their rights and obligations within the framework of the grievance mechanism and teach them how to use it. Address any grievances filed under the grievance mechanism	Conflict prevention	EBRD PR2 IFC PS2	Developer EPC Contractor and sub-contractors	Prior to construction works on site and for the entire duration of the project	Demonstration of proper implementation of the complaints resolution mechanism Communications to the Project employees concerning the mechanism	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Erosion prevention and soil conservation Any earthmoving undertaken for the Project must be compliant with international best practice on management of surface soil, prevention of erosion and management of borrow areas. This will include identifying cut and fill areas upstream of the Project.	Pollution prevention and control	Moroccan Law EBRD PR3 IFC PS3	EPC Contractor Approval by the Developer	Procedure to be developed by the EPC Contractor prior to construction works on site and will be applied during construction works and validated by the Developer.	Conservation and reuse of the topsoil Ensure that the surface runoff does not drain into <i>chaâbats</i> and <i>oueds</i> .	
3.2	Water supply Include in the contract the obligation for the EPC Contractor to supply its worksite and worksite facilities with water preferably purchased from an authorised source (it is forbidden to pump water from underground or shallow aquifers without authorisation) and to keep track of the Project's water consumption.	Anticipation and prevention of the risks relating to conflictual use of water resources	Moroccan Law EBRD PR3 IFC PS3	Developer EPC Contractor	Prior to construction works on site	Procedure for supplying the worksite with water from an authorised source Keeping track of water consumption	
3.3	Pollution Prevention and Control Develop and implement : <ul style="list-style-type: none"> A waste management scheme (all waste: solid or liquid, household waste, construction waste, waste generated by the dismantling of the existing wind turbines, etc.). Identify the nearby authorised waste management sites with the capacity to handle the waste materials generated by the Project <ul style="list-style-type: none"> Plan for soil conservation: topsoil management, prevention of erosion, revegetation of temporary sites, access and traffic routes, as well as borrow and spoil disposal areas. Definitive and uncontrolled disposal of spoils along secondary/major roads will be forbidden. 	Pollution prevention and control	Moroccan Law EBRD PR3 IFC PS3	EPC Contractor Approval by the Developer	Waste management plan and soil preservation plan prepared by the EPC Contractor and validated by the Developer at the beginning of construction works on site	Demonstration of implementation of the waste management Plan Demonstration of implementation of the soil preservation plan	

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3.4	Hazardous materials handling plan Develop and implement a hazardous materials handling plan	Pollution prevention and control	EBRD PR6 IFC PS3	EPC Contractor Approval by the Developer	Hazardous materials handling plan developed by the EPC Contractor and validated by the Developer prior to construction works on	Demonstration of implementation of the Hazardous materials handling plan	
3.5	Ban on the use of pesticides The nature of the Project does not justify intensive use of pesticides (insecticides or herbicides) during the construction or operation phase. A pest control programme minimising as much as possible the use of pesticides is to be developed and implemented. In the event that the Project should use herbicides, evaluation of their impacts and toxicity will be performed, and appropriate measures (on-site storage areas, safety datasheet of the products concerns, etc.) will be proposed and implemented	Pollution prevention and control	EBRD PR3 IFC PS3 Good international practices	EPC Contractor Approval by the Developer	From the start of construction works until completion of the project.	Implementation of the pest control programme prohibiting the use of pesticides, and demonstration of good performance. If the Project uses herbicides, conduct an impact assessment and implement proposed mitigation measures and demonstrate their effectiveness.	
3.6	Management of Greenhouse gases (GG) and study of physical risks related to climate change Quantify the Project's total greenhouse gas emissions during the construction phase. The Developer must ensure that the EPC Contractor adopts measures to mitigate greenhouse gas emissions, during the construction phase, to the extent possible Carry out a study of the physical climatic risks material to the Project on the basis of climatic projections available for the Project area and for Morocco.	Reduction of GG Prevention of physical climatic risks of the Project	EBRD PR3 IFC PS3 International best practices	Developer EPC Contractor	Prior to construction works During construction works	Quantification of GG Study of the physical climatic risks of the Project Measures adopted to mitigate greenhouse gas emissions during the construction phase	

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PR4	Health and safety						
4.1	<p>Project's environmental, social and health/safety performance</p> <p>The Developer shall supervise and monitor the activities of both the EPC Contractor and of its sub-contractors during the construction phase so as to ensure that any and all risks to health and safety are identified and adequately addressed. Performance in regard to health and safety will be assessed within the framework of the ESMS and the management schemes associated thereto, and also in line with the Project's performance requirements in regard to health and safety. The Project's performance as regards health and safety will be the subject of reports and feedback.</p>	EPC Contractor's H&S performance	<p>EBRD PR 4 IFC PS2</p> <p>International best practices</p>	Developer	<p>During the construction phase</p> <p>During the operation phase</p>	Evaluation, monitoring and reporting on the H&S performance of the EPC Contractor and its sub-contractors	
4.2	<p>Project's environmental, social and health/safety performance</p> <p>During the construction and operation phase, require the EPC Contractor to:</p> <ul style="list-style-type: none"> - Appoint an HSE (Hygiene Health Safety Environmental) manager <p>Develop and implement a Hygiene and Safety Plan describing the management and monitoring of the safety and health hazards during the construction and operation phases, including: (i) review of the risks (working at height, lifting operations, live electric circuits, mobile heavy equipment, hazardous products, noise and vibrations, etc.) and HSE organisation, (ii) personal protection equipment, (iii) handling of solid and liquid waste, (iv) protection of the public and safety of the community living near the construction site, (v) management of road traffic and (vi) other specific HSE measures that the SPV may wish to see identified</p>	Prevention of health and safety hazards facing workers	<p>EBRD PR 4 IFC PS1</p> <p>International best practices</p>	<p>EPC Contractor</p> <p>Approval by the Developer</p>	Hygiene and safety plan prepared by the EPC Contractor and validated by the Developer prior to commencement of construction works on site	Demonstration of implementation of the hygiene and safety plan	

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4.3	<p>Protect the workers and the population from the dangers of traffic within and outside the Project</p> <p>Develop and implement a Plan on managing traffic within and outside the Project.</p> <p>The plan on managing traffic outside the Project must take account of the initial traffic on Route RP4703, as well as cumulative impacts on the access routes (e.g. on work at quarries).</p> <p>Put in place a system for ensuring all drivers (those who are involved in the smooth running of the Project: both working at the project and sub-contractors and suppliers) report about traffic incidents/accidents and potentially dangerous driving conditions on external roads used by the Project.</p>	Prevention of health and safety hazards facing workers and the local population	EBRD PR 4 IFC PS1 International best practice	EPC Contractor Approval by the Developer	Management Plan of internal and external traffic prepared by the EPC Contractor and validated by the developer prior to construction works at the site	Demonstration of implementation of internal and external traffic management plan	
4.4	<p>Protect workers, the population and biodiversity from dangers in emergencies</p> <p>Develop and implement an emergency preparedness and response plan.</p> <p>Such a plan shall include a description of the channels of communication with the communities, nearby projects and the authorities. It is to be presented to the civil protection authorities, as necessary.</p> <p>The plan shall also include a plan for preventing and fighting fires, which is to be linked to the warning system (i.e., observation towers), staff training on best avoidance practices, the protocol and emergency response equipment, training of staff that are part of the protocol, coordination with the Water and Forest Department (which has its own fire-fighting mechanism) and the fire brigade.</p> <p>The plan is to be updated before the onset of the operation phase.</p>	Prevention of health and safety hazards facing workers and the local population Prevention and management of the risk of loss of biodiversity as a result of forest fires	EBRD PR 4 IFC PS1 and PS4 International best practice	EPC Contractor Approval by the Developer	Emergency response plan comprising a plan on preventing and fighting fires as prepared by the EPC Contractor and validated by the Developer prior to construction works at the site	Demonstration of implementation of the emergency response Plan, including a plan on preventing and fighting fires	

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4.5	<p>Protecting the population from the hazards of the wind farm and power lines</p> <p>Integrate the wind farm facility into rural landscape planning so as to prevent any occupancy that could expose the population to hazards.</p> <p>Include the power line in the urban planning documents so as to ensure that no construction is permitted within 60 metres on either side of the power line.</p>	Prevention of health and safety risks to the population	<p>EBRD PR4 IFC PS1</p> <p>International best practice National legislation</p>	Developer, local authorities and urban agency	At the completion of the wind farm and the power line	Demonstration at the start of construction that no occupancy is planned that could endanger the population owing to the wind farm and high voltage power line	
4.6	<p>Protecting the population from noise generated by the wind turbines</p> <p>Put in place a noise monitoring programme during the first year of the operation phase, at a time of night when the wind speed reaches a maximum 9 m/s (highest noise level of the wind turbines at 9 m/s based on the results of the noise modelling) as recorded at the sensitive receptors closest to the wind turbines (sample of residential houses). After one year, stop the systematic monitoring of noise emissions if the results are positive, and instead, focus on addressing complaints.</p> <p>Ensure that the complaints resolution mechanism (see Action 2.8) includes entertaining complaints about noise levels exceeding the limits set out in the contract with the EPC.</p> <p>Verify implementation of the noise reduction strategy put in place by the EPC Contractor to limit the operation of those turbines identified as exceeding the wind speed and, hence the noise levels set out in the EPC contract.</p>	Prevention of health and safety risks to the population	<p>EBRD PR 4 IFC PS1 and PS4</p> <p>International best practice</p>	Developer	During operation of the wind farm	<p>Records of the monitoring programme put in place, including identification of sensitive receptors</p> <p>Results of noise measuring exercises</p> <p>Demonstration of proper implementation of the EPC Contractor's noise mitigation strategy</p> <p>Complaints log</p>	

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4.7	Protecting the population from the stroboscopic effects of the wind turbines Verify the implementation of the EPC Contractor's shut-down protocol when shadow-flicker thresholds are exceeded, based on the model developed by the EPC Contractor, as part of the impact study on the expected stroboscopic effect. Put in place a programme for monitoring the stroboscopic effect during the operation at the sensitive receptors on the basis of the grievance mechanism (see Action 2.8) and implementation of mitigating measures when thresholds are exceeded. Ensure that the complaints resolution mechanism (see Action 2.8) includes entertaining grievances concerning stroboscopic effects	Prevention of health and safety risks for the local population	EBRD PR 4 IFC PS1 and PS4 International best practice	Developer	During operation of the wind farm for the implementation	Monitoring system put in place, including sensitive receptors and a protocol on shutting off turbines Complaints log	
4.8	Human Rights Risk Assessment Complete the socio-economic impact analysis with an assessment of the main human rights risks in relation to the potential impacts of the Project activities, including the supply chain, and the recommended management measures to mitigate these identified potential risks.	Prevention of risks related to human rights material to the Project	International best practice	Developer	Prior to construction works	Assessment of human rights risks material to the project	
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	Continue to implement the Framework Land Acquisition Plan ("le Plan Cadre d'Acquisition des Terres") as developed by the Project , while at the same time ensuring that the acquisition of land and property, compensations and other forms of assistance and the consultations are in compliance with Moroccan law and the Land Acquisition Framework Plan, as well as the EBRD's PR5 requirements. Put in place a specific engagement plan on land acquisition which includes a complaints resolution mechanism.	Prevention of impacts relating to the acquisition of land, restrictions on use of such land and involuntary resettlement and mitigation of the risk of delays to the construction	Moroccan Law Framework Land Acquisition Plan (LARF) EBRD PR5 IFC PS5 International best practice	Developer	Pursuant to the Framework Land Acquisition Plan (including for monitoring)	Demonstration of the Plan's implementation Implementation of the specific engagement plan, inclusive of a complaints resolution mechanism. Minutes of meetings and consultations. Complaints log	

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5.2	Plan and perform the construction work while ensuring that it has minimum impact related to physical and economic displacement , notably when selecting the location of worksite accommodation camps, electric power poles and potential temporary construction areas (whose exact location is unknown at this stage).	Prevention of impacts relating to acquiring land, restrictions on the use of such land and temporary resettlement	Moroccan Law EBRD PR5 IFC PS5 International best practice	Developer	During the project design phase and prior to commencement construction works	Project design	
5.3	Identification of and, where necessary, assistance to vulnerable persons Identify vulnerable persons among the people affected by the Project in terms of the ongoing or pending land acquisition process. (The Sponsors confirm that no economic or physical displacement is expected along the power line segment). Where applicable, quantify them, ensure that they are fully engaged in the process, and provide social and legal assistance based on the Project's Land Acquisition Plan and existing legislation.	Protection of vulnerable persons	EBRD PR5 IFC PS5 International best practice	Developer	During the administrative and legal phases of the land acquisition process, still to be conducted or in progress.	Identification of vulnerable persons among the people affected by the Project in terms of land acquisition. As necessary, impact assessment and putting measures in place, as well as a calendar and a detailed budget and the people responsible for implementation. Demonstration of implementation of the measures proposed.	

No.	Action	Environmental & Social Impacts	Requirements	Resources & responsibilities	Timeframe	Performance criteria	Status
5.4	<p>Follow-up and evaluation</p> <p>In accordance with the LARF as it pertains to the power line segment</p> <p>Implement proximity follow-up to ensure that the owner is adequately compensated by contracting party for any losses incurred, in the event of damage to crops.</p> <p>(The Sponsors confirm that no economic or physical resettlement is to be envisaged for the power line. This could be further confirmed during the identification of the people affected by the Project, or alternatively, the matter will be followed up (see LARF).</p> <p>In accordance with the LARF as it pertains to the wind farm</p> <p>Implementation of close monitoring to ensure that the living conditions of the persons affected by the land acquisition and physical resettlement are improved, or at least re-established.</p> <p>Independent assessment by the independent consultant hired by the SPV (Lenders Environmental and Social Advisor) to be conducted at the end of the Process in order to verify compliance with PR5 and the provisions of the plans mentioned above.</p>	Ensure effective follow-up on the land acquisition	<p>EBRD PR5 IFC PS5</p> <p>International best practice</p>	Developer	<p>Close monitoring by the Developer until confirmation of re-establishment of livelihood.</p> <p>External monitoring: Annual and closure audit by the independent consultant hired by the SPV (see ESAP measure 1.7 – Lenders Environmental and Social Advisor) depending on scheduled plans, once improvement measures or re-establishment of means of livelihood in terms of damage to crops have been implemented and their results can be assessed.</p>	<p>Evaluation reports submitted to the EBRD every ten months,</p> <p>External evaluation monitoring reports submitted yearly, and closure audit</p>	

No.	Action	Environmental & Social Impacts	Requirements	Resources & responsibilities	Timeframe	Performance criteria	Status
PR6	Biodiversity and Living Natural Resources						
6.1	<p>Monitoring habitats</p> <p>Monitor the impact of the construction on the habitats:</p> <ul style="list-style-type: none"> - The developer shall monitor sensitive habitats to avoid destruction of sensitive habitats such as cushion plants, salamander habitats, habitats where sensitive birds are known to nest, and trophic and breeding habitats for chiropterans. Any salamander individuals found will be translocated to an equivalent habitat outside of the developed habitat, if possible. If breeding birds or chiropterans are found during construction, they will not be disturbed, and bird nests or chiropteran breeding sites will be preserved until breeding is complete. For nesting birds, chicks will be transported to the equivalent habitat near the work site. - The developer will limit dust generation to avoid habitat alteration by limiting traffic speed in work areas and will implement clear signage and penalties <p>Where appropriate, If it is necessary to use a sensitive habitat (e.g., cushion plants and salamander habitat), a formulation of measures (including a compensation plan and a rehabilitation plan - see Action 6.3 and Action 6.8) will be required by a competent person trained and knowledgeable about sensitive habitats.</p> <p>Any changes to the project or works will be studied in consultation with ecological experts.</p> <p>A micro-siting approach to avoid direct encroachment of turbines and mounting areas on sensitive habitats may be considered. Clearing in wooded habitats will have to be discussed with the Regional Water and Forestry Directorate (who will determine the cost of compensation if necessary).</p>	Risk of loss of sensitive habitats	EBRD PR6 IFC PS6	Developer	Before clearing, excavating and occupying sensitive habitats.	<p>Avoiding destruction of sensitive habitats, such as cushion plants, salamander habitats, cork oak trees (the latter close to the power lines).</p> <p>As necessary, assessment of the impact of putting a sensitive habitat to such use, and formulation of mitigation and compensation measures.</p> <p>Speed limit respected on site</p> <p>Report on salamander translocation, if individuals are spotted</p> <p>Planning of interventions on site outside of the breeding season (from nest occupation to fledging)</p> <p>Ornithological monitoring report in case nests are present.</p>	

No.	Action	Environmental & Social Impacts	Requirements	Resources & responsibilities	Timeframe	Performance criteria	Status
6.2	Spoil material disposal areas Identify the sensitive zones to avoid for disposal of spoil material. The material dug up during excavation must immediately be loaded up on vehicles and transported to disposal sites specially built for that purpose.	Preventing the risk of mishandling work to manage spoil and rehabilitate habitats	EBRD PR6 IFC PS1 and PS6	EPC Contractor	Before excavation at the site	Identification of sensitive areas for spoil disposal Specially built spoil disposal areas	
6.3	Rehabilitation plan Develop and implement a rehabilitation Plan (e.g., by means of revegetation) of the impacted habitats. Prohibit the introduction of foreign soils or plants to the site in order to avoid any risk of propagation of invasive species likely to modify the habitats. Use only native species.	Preventing loss of habitats and their flora and fauna	EBRD PR6 IFC PS1 and PS6	EPC Contractor Approval by the Developer	Rehabilitation Plan prepared by the EPC Contractor and validated by the Developer prior to construction works	Demonstration of implementation of the Rehabilitation Plan	
6.4	Environmental incidents Keep a record of any environmental incidents (fires, pollution, accidental or intentional deaths of animals, translocation of animals and plants ...) and ensure that it is regularly updated. The incident report will also include bird collisions. Immediately transport wildlife carcasses detected on site to the vulture cache to prevent the presence of carcasses on site. Conduct daily inspections of cable trenches to ensure that no reptiles, amphibians, or mammals are trapped.	Improving management of environmental impacts	EBRD PR6 IFC PS1	Developer EPC Contractor	Throughout the Project	Record of ecological incidents In case of a significant E&S incident, a report will be submitted to the lenders within 24 hours to alert them Pre-trench inspection record	

No.	Action	Environmental & Social Impacts	Requirements	Resources & responsibilities	Timeframe	Performance criteria	Status
6.5	Design of power lines The "AEWA Guidelines on How to Avoid or Mitigate Impact of Electricity Power Grids on Migratory Birds" will be included among the technical requirements established as regards the technical design of the power lines under the EPC contract.	Preventing mortality risk of avifauna at the site	ONEE standard AEWA-CMS Guidelines (Agreement on the Conservation of African-Eurasian Migratory Waterbirds) Convention on Migration. Species (Bonn Convention) Guidelines of the "Group of experts of the Bern Convention on the conservation of birds and "Birds and Power Lines within the Rift Valley/ Red Sea Flyway" EBRD PR6 IFC PS1 and PS6	EPC Contractor Approval by the Developer	Design of power lines to be validated by the Developer prior to construction works	Application of "AEWA Guidelines on How to Avoid or Mitigate Impact of Electricity Power Grids on Migratory Birds" to the technical design of power lines. Demonstration of application.	
6.6	Modelling of collision risks for avifauna Thereafter, the bird collision risk modelling will be updated every 3 years by the IOE, or at any other frequency agreed between the parties. The bird collision risk modelling will be carried out in line with good practice (e.g. Scottish Heritage Guidance Notes or similar BirdLife International guidelines).	Managing the risks of loss of the site's avifauna	EBRD PR6 IFC PS6	Developer EPC Contractor	During Operation phase ; revision every 3 years or at any other frequency agreed between the parties.	Updated model on collision risks	

No.	Action	Environmental & Social Impacts	Requirements	Resources & responsibilities	Timeframe	Performance criteria	Status
6.7	<p>Biodiversity action plan – update</p> <p>Updating the Biodiversity Action Plan (BAP) prepared for the Project</p> <p>The BAP will be updated every 3 years, or at any other frequency agreed upon by the parties.</p> <p>The update will include:</p> <ul style="list-style-type: none"> - Reassessment of the Project's impacts on herpetofauna, avifauna, and chiropterans, including cumulative impacts, and updating of related measures; - Identification of positive conservation actions where necessary (see Action 6.15). 	Preventing harm to the site's biodiversity	<p>Moroccan Law</p> <p>EBRD PR6</p> <p>IFC PS6</p>	<p>Developer</p> <p>EPC Contractor</p>	During Operation phase ; revision every 3 years or at any other frequency agreed between the parties.	Updated Biodiversity Action Plan (BAP)	

6.8	<p>Biodiversity action plan – implementation</p> <p>Implement the Biodiversity Action Plan (BAP).</p> <p>Specifically in relation to construction activity, perform the following tasks:</p> <ul style="list-style-type: none"> - verify and guarantee conformity of the construction with the measures set out in the ESIA and the Biodiversity Action Plan, - Avoid creating artificial habitats near wind turbines that are attractive to large birds, - minimizing the lighting of wind turbines, and - ensure that new impacts do not arise and, if they do, devise appropriate mitigations and develop specific action plans (transplanting plants, especially vulnerable species or preventing their destruction, rehabilitation/revegetation of the impacted habitats, occupation of sensitive habitats, management of spoil disposal areas, handling of potentially polluting materials, etc.). <p>Specifically in relation to operation activity, perform the following tasks:</p> <ul style="list-style-type: none"> - In line with Before-After Impact Control approach, depending on the outcome of the field data at post-construction phase, implement measures as per EUROBATS Guidelines such as increase of cut-in speed of turbine blades associated with bat injury or mortality to ensure risks are mitigated associated with the turbines leading to injury or mortality of bat species or any other appropriate alternative. . Verify through field monitoring data the performance of the implementation of the mitigation measures. - Additional conservation measures for bats species will be developed in case the results of monitoring of bats mortality will show significant effects. These measures might include support to bats conservation off-site like roosts 	Preventing harm to the site's biodiversity	<p>Moroccan Law</p> <p>EBRD PR6</p> <p>IFC PS6</p>	<p>Developer</p> <p>EPC Contractor</p>	From the time the Environmental manager takes up their post and for the entire duration of the Project	<p>Demonstration of implementation of the Biodiversity Action Plan (BAP)</p> <p>Reports assessing how far any action taken complies with the Biodiversity Action Plan (BAP), with recommendations for corrective and monitoring work, and with additional measures with which the Developer can reinforce the BAP as necessary.</p>	
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No.	Action	Environmental & Social Impacts	Requirements	Resources & responsibilities	Timeframe	Performance criteria	Status
	<p>protection and enhancement, and awareness raising at the local and national level in cooperation with local qualified experts, or other appropriate alternative.</p> <p>Biodiversity Action plan will also include avifauna mitigation and management.</p>						
6.9	<p>Mortality of birds and bats</p> <p>Develop a monitoring system for mortality of birds and bats) under the programme for monitoring avifauna and chiroptera as set out in the BAP.</p> <p>Experts on birds and bats (IOE) will be hired to undertake the monitoring during migration periods (September-November and April-June approximately)</p>	<p>Mitigating collision and/or electrocution of migratory birds and chiroptera</p> <p>Monitoring mortality of birds and bats</p> <p>Reporting mortality of birds and bats</p>	EBRD PR6 IFC PS6	Developer EPC Contractor	Throughout the operation phase	<p>Demonstration of implementation of the avifauna monthly monitoring programme and the chiroptera monitoring programme.</p> <p>Monthly monitoring mortality of migratory birds and chiroptera</p>	

No.	Action	Environmental & Social Impacts	Requirements	Resources & responsibilities	Timeframe	Performance criteria	Status
6.10	<p>Shut-Down On Demand Protocol</p> <p>Design of a preventive on-demand shutdown protocol based on avian collision risk modeling.</p> <p>The on-demand shutdown protocol will define the mechanisms and criteria to be used to make shutdown decisions, by the Operator after notification by the IOE. Shutdown will be based on available data (including field monitoring) and will focus on birds and possibly bats (depending on the results of the additional study - Action 6.14). The IOE will keep a record of all such actions.</p> <p>Review/adjust the shutdown protocol during the first few years of operation if needed, based on the results of the Biodiversity monitoring during the operation phase.</p> <p>The on-demand shutdown system will be based on the monitoring system and will include the use of:</p> <ul style="list-style-type: none"> - Radar or camera systems, and - Field observers (IOE) to provide data to supplement normal observations and track carcasses. - Adjustments to the shutdown protocol will be made every 3 years to take into account available data to optimize the systems, or at any other frequency agreed upon by the parties. <p>Freewheeling situations, i.e. free rotation of the turbines in light wind without electricity production, will be limited (SPV will do its best to limit them).</p> <p>-</p>	<p>Collision risk for migratory birds</p> <p>Mitigation of barotrauma and collision risks for bats</p>	<p>EBRD PR6</p> <p>IFC PS6</p>	<p>The project company and the operations and maintenance company</p>	<p>Development of a shut-down protocol based on the findings of the additional studies prior to operation.</p> <p>Adjustments, where relevant, and at least every 3 years, based on the results of post-construction monitoring programmes specifically concerning birds and chiroptera and findings from mortality monitoring</p>	<p>Shut-down on demand protocol for birds and bats</p> <p>Monthly census of mortality of birds and chiroptera in the surroundings of the wind turbines</p> <p>Follow-up on any red flags concerning birds and chiroptera</p>	

No.	Action	Environmental & Social Impacts	Requirements	Resources & responsibilities	Timeframe	Performance criteria	Status
6.11	Compensatory measures Develop measures to compensate for net losses or net gains of the species at issue, should preventive and corrective measures prove insufficient for: <ul style="list-style-type: none"> - Sensitive habitats (Action 6.1) and the sensitive species that inhabit them - Birds and chiroptera where the mortality thresholds have been exceeded (Action 6.9) 	Compensation for loss of identified sensitive habitats and the sensitive amphibian, reptile or insect species that inhabit them Compensation for risk of collision for birds and bats	EBRD PR6 IFC PS6	Developer EPC Contractor	As soon as possible following the expected impact of the construction on sensitive habitat. As soon as possible following the results of the mortality monitoring.	Development of compensation measures based on the findings of: monitoring sensitive habitats; and the mortality of birds and chiroptera.	
6.12	Support for the activities of the Jbel Moussa Vulture Rehabilitation Centre Provide support to the Vulture Shelter at Jbel Moussa. The aim is to prevent the death of these birds of prey, given that they are drawn towards Jbel Moussa and do not have to look for food elsewhere, including in the environs of the Koudia El Baida facility. The actions in support of work at the Vulture Rehabilitation Centre are to be defined by the Developer.	Risk of mortality of chiroptera from barotrauma (or impact)	EBRD PR6 IFC PS6	Developer	Throughout the operation phase	Demonstration of support to the CAV-JM vulture rehabilitation centre	
6.13	Training/sensitisation Training/awareness of personnel on biodiversity in general and the site in particular (habitats and species including avifauna, chiropterans, amphibians, reptiles, insects and terrestrial mammals, impacts and losses, pollution, conservation, regulations ...). This training should also cover the formal prohibition of the use of vulnerable flora species and the respect of delimited areas for construction by all those involved in the construction, the respect of speed limits and the associated risk of crushing terrestrial fauna. Prohibit and control all activities that may lead to wildlife mortality (poaching, poisoning, keeping and trading of animals, use of pesticides) by project stakeholders and the community. Sanction all disturbances to birds and chiropterans, including noise disturbances.	Raising workers' awareness about biodiversity	EBRD PR6 IFC PS6	Developer EPC Contractor	At the launch of construction works and operation phases	Compliance with the skills enhancement plan Staff training records Restrictions on access to the area acquired for park development for activities harmful to wildlife (hunting, poaching)	

No.	Action	Environmental & Social Impacts	Requirements	Resources & responsibilities	Timeframe	Performance criteria	Status
6.14	Additional study on chiropterans Conduct a chiropteran survey The study will be conducted with pre-operation ground level measurements in all areas of the project, and specifically in the four areas where the 2018 nacelle surveys took place. These measurements may be taken by continuous ultrasonic detection with a detector-recorder at ground level. A 6-day visit in June, July and August during periods of high chiropteran activity. The study, the re-evaluation of the impacts of the project on the group and in particular its habitat and the updating of the related measures will be carried out by a chiropteran expert.	Prevention and management of the risks of loss of chiropterans from the site	EBRD PR6	Developer	Before the start of construction	Additional study of chiropterans	
PR7	Indigenous People						
7.1	PR7 is not deemed applicable to this Project						
PR8	Cultural Heritage						
8.1	Tangible and intangible cultural heritage Develop and implement a procedure for safeguarding tangible and intangible cultural heritage (sacred buildings, mosques and burial grounds, etc.) located in the Project area. Keep written records of the demands of the people affected, as well as the competent religious and interested local authorities who are in charge of safeguarding cultural heritage.	Safeguarding cultural heritage	Moroccan Law EBRD PR8 IFC PS8	EPC Contractor Approval by the Developer	Procedure governing safeguarding of tangible and intangible cultural heritage prepared by the EPC Contractor and validated by the Developer prior to the start of construction work	Demonstration of compliance with the Procedure governing the safeguarding of tangible cultural heritage. Staff training records. Records of consultations with people affected, and interested local authorities.	
8.2	Chance finds Develop a procedure on how to handle chance archaeological discoveries. Inform the workers about the kind of objects they might find and the procedure to follow in the event of a chance find.	Safeguarding cultural heritage	Moroccan Law EBRD PR8 IFC PS8	EPC Contractor Approval by the Developer	Procedure governing chance archaeological discoveries as prepared by the EPC Contractor and validated by the Developer prior to the start of the construction phase	Demonstration of compliance with the Procedure governing chance archaeological discoveries. Staff training records.	

No.	Action	Environmental & Social Impacts	Requirements	Resources & responsibilities	Timeframe	Performance criteria	Status
8.3	<p>Respect for the culture, customs and habits of local communities</p> <p>Organise awareness sessions to help foreign staff understand how they are expected to interact with local communities (focusing on preventing/avoiding sexually harassing behaviour).</p> <p>Educate workers from outside Morocco on religious issues and on what is considered culturally appropriate behaviour.</p>	Safeguarding cultural heritage	<p>Moroccan Law</p> <p>EBRD PR8</p> <p>IFC PS8</p>	EPC Contractor Developer	For every new recruit with no prior working experience in Morocco	Training records and sensitisation of foreign workers	
PR10	Information Disclosure and Stakeholder Engagement						
10.1	<p>Stakeholder Engagement Plan (SEP)</p> <p>Publish and implement the Stakeholder Engagement Plan prepared by the Project, according to modalities that vary depending on the stakeholder's category. Implementation of the SEP will guarantee access to information for all parties with an interest in the project, including vulnerable groups.</p> <p>The SEP is to be regularly updated when necessary, as the Project progresses.</p> <p>Establish a grievance mechanism. The mechanism will apply to grievances of all kinds that external stakeholders could raise about the Project.</p>	Stakeholder engagement	<p>Moroccan Law</p> <p>EBRD PR10</p> <p>IFC PS1</p>	Developer	From the time the Social manager takes up their post and for the entire duration of the Project	<p>Publication of the engagement plan.</p> <p>Demonstration of implementation of the Stakeholder Engagement Plan and timely updating (as a minimum, before the start of construction).</p> <p>Record of grievances.</p>	

No.	Action	Environmental & Social Impacts	Requirements	Resources & responsibilities	Timeframe	Performance criteria	Status
10.2	<p>Informing the public about the Project's environmental and social performance</p> <p>Conduct a public inquiry ("enquête publique" pursuant to the implementation decrees of Law No. 12-03. Submit the draft to the Unified Regional Investment Committee (URIC) to gain environmental acceptability.</p> <p>Undertake public consultations in the Project's catchment area during the period leading up to the start of construction.</p> <p>Once implemented, the SEP will be self-supporting and accessible to the public, and will include the contact details of the Project officials (including community liaison officers) in charge of engaging with stakeholders and recording grievances.</p> <p>Publish on an website updated at least once a year a coherent package of information selected by the Developer which demonstrates the Project's good environmental and social performance.</p>	<p>Information to the public, grievance mechanism.</p> <p>Demonstration of the Project's environmental and social performance.</p>	<p>Moroccan Law</p> <p>EBRD PR10 IFC PS1</p> <p>Communication policy of the SPV/Sponsors</p>	Developer	<p>From the time the Social manager takes up their post and for the entire duration of the Project.</p> <p>Public consultations to be undertaken prior to the start of construction works.</p> <p>Starting from the first year following the entry into force of the ESAP.</p>	<p>Public inquiry conducted and environmental acceptability received before the start of construction.</p> <p>Public consultations to be undertaken before construction starts.</p> <p>Records of public consultations and engagement meetings held.</p> <p>Webpage in place and updated annually.</p>	
10.3	<p>CSR Programme</p> <p>Develop and implement a corporate social responsibility programme (CSR)</p>	<p>Non-discrimination and equality of opportunity</p> <p>Economic inclusion</p>	<p>Moroccan Law and Public Policy</p> <p>EBRD PR1 IFC PS1</p> <p>EBRD economic inclusion strategy</p> <p>International best practice</p>	Developer	For the entire duration of the Project	Demonstration of implementation of the CSR programme	
10.4	<p>Biodiversity information sharing with the Global Biodiversity Information Facility (GBIF)</p> <p>Share non-sensitive biodiversity data from studies conducted for environmental impact assessment and during biodiversity monitoring on the GBIF network to contribute to the availability of primary biodiversity data.</p>	Non-sensitive biodiversity data sharing	International best practice	Developer	For the entire duration of the Project	Non-sensitive biodiversity data shared on the GBIF network	

Acronyms and Abbreviations

Name	Description
EBRD	European Bank for Reconstruction and Development
GIIP	Good international (industrial) practices
CAV-JM	Jbel Moussa Vulture Rehabilitation Centre
URIC	Unified Regional Investment Committee
ESDD	Environmental and Social Due Diligence
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
PR	Performance Requirements
EHS	Health and Safety Environment
WBG	World Bank Group
HHSE	Hygiene Health Safety and Environment
MASEN	Moroccan Agency for Sustainable Energy
ONEE	Office National de l'Eau et de l'Electricité
BAP	Biodiversity Action Plan
ESAP	Environmental and Social Action Plan
LAP	Land Acquisition Plan
SEP	Stakeholder Engagement Plan
ESP	Environmental and Social Policy
ESMMP	Environmental and Social Management and Monitoring Plan
PIP	Public Information Policy
NTS	Non-Technical Summary
CSR	Corporate Social Responsibility
IFC	International Finance Corporation
SBEI	Site of Biological and Ecological Interest
ESMS	Environmental and Social Management System
EU	European Union
IUCN	International Union for Conservation of Nature