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Jbel-Sendouq Khalladi
Wind Farm and 225kV Power Line Project
Tangier, Morocco

Environmental and Social Action Plan

August 2015

**Environmental and Social Action Plan
Khalladi Wind Farm Project**

Note: The personnel hired (or to be hired) by UPC renewables mentioned in the ESAP includes hired personnel (or to be hired) by ACWA Power Morocco.

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, International Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
EP1	Assessment and Management of Environmental and Social Impacts and Issues					
1.1	Environmental and Social Monitoring Report Submit to the EBRD a progress report: <ul style="list-style-type: none"> • Implementation status of the ESAP • Environmental and social performance report in relation project activities/status 	Environmental and social monitoring	EBRD PR1 Loan Agreement requirement	UPC renewables The format of the annual report will be provided by the EBRD.	Construction: every six months Operation: the end of the first quarter of each year during the credit period.	Reports submitted and approved by the EBRD.
1.2	Environmental and Social Management during the construction phase assign within the UPC renewables team the following three (3) responsibilities (one to three personnel, and providing the necessary resources), under the direct authority of the Project Manager:	Implementation of regulatory requirements and ESAP	Moroccan legislation EBRD PR1	Personnel engaged by UPC renewables (these three responsibilities)	Upon entry into force of the ESAP and for the duration of	The three leaders are recruited and retained in

	<ul style="list-style-type: none"> "Environment" responsibility in charge of compliance with environmental legislation Moroccan (including environmental recommendations of the EIA and specifications) and the implementation of the ESAP (EP1, EP3 and EP6) "Social" responsibility in charge of compliance with legislation Moroccan labor, social recommendations of the EIA and specifications, and implementation of the ESAP (EP2, EP5, EP10 and EP8) "Health and Safety" responsibility in charge of compliance with health and safety legislation Moroccan (including the recommendations of the EIA and specifications) and the implementation of the ESAP (EP4) 			can not be outsourced) and resources must be allocated	the construction period.	office until the end of the construction phase
1.3a	Prepare an Environmental and Social Management and Monitoring Plan that is based on the Framework ESMMP		Moroccan legislation EBRD EP1	UPC renewables with the support of a Specialist Consultant	By the end of the consultation period for the additional ESIA documents	The ESMMP is prepared by UPC Renewables and approved by EBRD
1.3b	Implementation of the Environmental and Social Management and Monitoring Plan (ESMMP English) by the Environmental, Social and Health and Safety Coordinator(s) during the construction phase, including notification to the EPC contractors of their obligations in		Moroccan legislation EBRD PR1	Organized by the coordinator(s), with support from external service	After 1.3.a and as soon as the coordinators are hired	The ESMMP is implemented

	relation to the ESMMP.			providers when needed	and during the construction phase	
1.4	Environmental and Social Management during the operation phase designate within the team UPC renewables the coordinator(s) "Environmental, Social, Health and Safety" in charge of compliance with Moroccan legislation (including environmental recommendations of the EIA and specifications) and the implementation of the ESAP for the operation phase.	Implementation of regulatory requirements and ESAP	Moroccan legislation EBRD PR1	personnel engaged by UPC renewables (these three responsibilities can not be outsourced)	6 months before the end of the construction phase	Coordinator(s) appointed and held in position throughout the operating phase
1.5	Update of the Environmental and Social Management and Monitoring Plan for the operation and implementation phase.		Moroccan legislation EBRD PR1	Organized by the coordinator(s) "Environmental, Social, Health and Safety", with support from external service providers when needed	ESMMP updated before the start of the operational phase ESMMP implemented during the operational phase	ESMMP updated and submitted for no objection to the EBRD The ESMMP is then implemented
1.6	Implementation of an Environmental and Social Management System (ESMS) Integrating ISO 9001, ISO 14001 and OHSAS 18001 covering all project activities for the operational phase	Quality Assurance and Continuous Improvement	EBRD PR1	UPC renewables with the possible assistance of	Prepared system: during the first year of operation	Integrated prepared and certified.

		nt		a specialized firm to prepare the ESMS. Certification audits by a certified firm.	Certification: in the second year of operation	Certification renewed regularly
1.7	<p>Quality, and Performance control of environmental, social and health / safety of the work or service providers:</p> <p>During the construction and operational phases, for contracts for services or work more than one million Euros, the providers are required to:</p> <ul style="list-style-type: none"> - Appoint a HSE (Health Safety Environment Health) - Include in their offers HSE risk management specific plan that comply with Moroccan legislation and the E&S EBRD policy: (i) review of the risks and HSE organization, (ii) personal protective equipment, (iii) management of solid and liquid waste, (iv) public protection and safety of neighboring communities to construction, (v) road traffic management and (vi) other specific measures that UPC renewables would like to see clarified. 	Quality assurance	<p>Moroccan legislation</p> <p>EBRD PR1</p>	<p>Request by UPC renewables</p> <p>Action to be implemented by the provider.</p>	<p>Upon entry into force of the ESAP and for the duration of the funding agreement</p>	<p>Request systematically made to the service provider.</p> <p>HSE Manager appointed HSE Plan prepared by the provider and implemented after approval by UPC renewables.</p>
1.8	<p>External audit in case of complaint or significant non-compliance</p> <p>On request of the EBRD, hire an independent consultant (chosen by agreement between</p>		<p>Moroccan legislation</p> <p>EBRD PR1</p>	UPC renewables	On request of the EBRD, in case of	Audit conducted

	UPC renewables and EBRD) for an E & S audit and recommendations for dealing with complaints or non-compliances.				complaint or significant non-compliance. (Max 2 audits per year)	
EP 2	Labour and Working Conditions					
2.1	Complaint management: Prepare and implement a complaints handling mechanism available to UPC renewables employees and employees of the EPC contractors and their subcontractors	Conflict prevention	EBRD PR2	UPC renewables.	Before the start of work	Mechanism implemented and effective
2.2	Human Resources Policy Prepare and make available permanently to all employees a Human Resources policy, in line with the H&S policy of the EBRD and including: <ul style="list-style-type: none"> equitable treatment, non-discrimination and equal opportunities for all workers; the right to membership in trade unions; No child and forced labour. 	Transparency and Human Resources Compliance Management	Moroccan legislation EBRD PR2	UPC renewables.	From the first year after the entry into force of the ESAP.	policy paper "Human Resources Policy" prepared and freely accessible
2.3	Human Resources of the EPC contractor: Require the EPC contractors working in Morocco: <ul style="list-style-type: none"> to manage human resources in accordance with the Moroccan legislation and with the EP2 of the H & S policy of the EBRD 	Preventing internal risks related to the presence of a large number of	Moroccan legislation EBRD PR2	Requirement made by UPC renewables. Action to be implemented by the EPC	Each EPC contractor management plan must be submitted to UPC	Requirement transmitted to each EPC contractor

	<ul style="list-style-type: none"> To prepare a human resource management plan for the construction phase including: <ul style="list-style-type: none"> The conditions of employment of local residents, Working conditions, The conditions of accommodation and catering. 	workers		contractors.	renewables before work begins	Human Resources Management Plan for each EPC contractor approved by UPC renewables social responsibility coordinator.
2.4	<p>Personal safety and security: Prior to the engagement (direct or via a service provider) of security staff, conduct a study of the risks (health, safety, working conditions) and on this basis prepare a management plan to apply to this activity.</p>	Anticipation and prevention of risks that security personnel will be exposed.	EBRD PR2	EPC contractor for the construction phase. UPC renewables for the operational phase	Risk assessment and management plan prepared before the start of the construction phase Updated plan for the operational phase	Risk and Management Plan prepared and implemented (directly or via a service provider)
EP 3	Resource Efficiency and Pollution Prevention and Control					

3.1	<p>Water supply: Include in the contract documents the obligation of the EPC contractors to supply their construction and site installations with water purchased from an authorized source (prohibition to pump from underground or surface sources)</p>	Preventing the risks of conflicting use of water resources	Moroccan legislation EBRD PR3	Notification of the EPC contractors by UPC renewables	Before the start of work construction	Obligation / restriction included in the contract documents of the EPC contractors.
3.2	<p>Prevention and control of pollution during the construction phase: Require the preparation and the implementation (after approval by UPC renewables) of the following:</p> <ul style="list-style-type: none"> waste management plan (all of waste: solid or liquid, domestic or construction waste, etc ..) soil conservation plan: land management, erosion control, revegetation of temporary sites, access roads and circulation, and borrow or disposal areas. The uncontrolled disposal of spoils along the roads/tracks is prohibited. 	Prevention and Control of Pollution	Moroccan legislation EBRD PR3	Requirement by UPC renewables Action to be implemented by the EPC contractors.	Prior to the start of work	Plan prepared, approved and implemented
3.3	<p>Prohibition of use of pesticides The nature of the project does not justify the use of pesticides (insecticides and herbicides) during the construction or operation phase. Their use is prohibited.</p>	Prevention and Control of Pollution	EBRD PR3 International best practices	Requirement by UPC renewables Action to be implemented by the EPC contractors for	From the start of work and for the duration of the financial agreement	Prohibition formulated and applied

				the construction phase and UPC renewables for the operational phase	t	
3.4	Flicker effect Implementation of the recommendation of the Flicker impact study	Prevention of Flicker effect	EBRD PR3 International best practices	UPC renewables	During the operational phase	Recommendations implemented
EP 4	Health and Safety					
4.1	Fire prevention and emergency plan Prepare a plan for the prevention of fire hazards and the management of emergency situations. The plan must include the safety of workers and the public; and will be presented to civil security authorities.	The risk of fire in the hills adjacent to the Project is a major risk to the safety of personnel	EBRD PR4	Requirement by UPC renewables Action to be implemented by each EPC contractor.	Before the start of work	Plan prepared and approved by UPC renewables, subject to civil protection authorities and implemented.
4.2	HSE Plan for major works: The measure in 1.7 of the ESAP (Quality, and Performance control of environmental, social and health / safety of the work or service providers) applies to the EPC contractors and	Risk prevention for personnel exposed to	EBRD PR4	Requirement by UPC renewables Action to be	HSE Plan each EPC contractor to prepare before	HSE Plan prepared by each EPC contractor

	their subcontractors.	work activities		implemented by the EPC contractors.	work	and implemented after approval by renewables UPC.
EP 5 Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	Restoring Livelihoods: Preparation and implementation of a plan to restore livelihoods, based on the Framework LALRPs and Social Impact Assessment, with particular attention to gender aspects.	Risk prevention, livelihood losses.	EBRD PR5 International best practices	UPC renewables	Plan prepared and approved by the EBRD before the start of works that may affect livelihoods. Implementation immediately after approval	Prepared and implemented Plan
EP 6 Biodiversity and Living Natural Resources management of living natural resources						
6.1	Biodiversity Protection Plan Implementation of biodiversity protection plan	Prevention of damage to biodiversity Site	Moroccan legislation EBRD PR5	UPC renewables	As soon as Environment Manager is engaged and during	Plan implemented

					the entire funding period	
EP 8	Cultural Heritage					
8.1	<p>Unforeseen encounters: Develop chance find procedure. Train/advise workers of the types of cultural heritage that could be discovered and what to do in case of unexpected discovery.</p>	Protection of cultural heritage	Moroccan legislation EBRD PR8	UPC renewables.	Before the start of the construction.	Procedure prepared before work. Inform workers.
EP 10	Information Disclosure and Stakeholder Engagement					
10.1	<p>Stakeholders Engagement Plan (SEP): Implement SEP prepared for the Project. The implementation of the SEP should ensure access to information of all parties involved in the project, including the vulnerable groups (illiterate women heads of household, etc.). The plan will be reviewed and adapted when the UPC renewables Social Manger deems it is necessary and at least at the start of the operational phase.</p> <p>Implement the Stakeholder Engagement Plan (SEP), including the grievance mechanism for external stakeholders, and a second round of public consultations which will specifically target women.</p>	Public information, complaint management	EBRD PR10	UPC renewables.	As soon as Social Manager is engaged and during the entire funding period. The public consultation following the disclosure of environmental and social documents should be undertake	The stakeholder participation plan is implemented by UPC renewables and updated in due course.

					n before the work begins.	
10.2	<p>Public information on environmental and social performance of the project Publish on line and up date at least annually, a comprehensive set of information selected by UPC and demonstrating good environmental and social performance of the Project.</p>	<p>Demonstration of the environmental & social performance of the Project</p>	EBRD PR10	UPC renewables.	From the first year after the entry into force of the ESAP.	Existing web page and updated annually.