

ENVIRONMENTAL AND SOCIAL ACTION PLAN TEMPLATE

| No. | Action | Environmental & Social Risks (Liability/Benefits) | Requirement (Legislative, EBRD PR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|------------|--|--|---|--|---|--|---|
| PR1 | Assessment and Management of Environmental and Social Impacts and Issues | | | | | | |
| 1.1 | <p>Environmental Management</p> <p>Develop and implement an EMS based on ISO 14001. Use the current existing structures and expertise at Damanhour power station as the basis. The EMS development is a gradual process and should start at beginning of NDPP site works, so that a fully functioning and certifiable system is in place at time of NDPP commissioning.</p> | Benefit: Optimisation of environmental management through a formalised system. | EBRD PR1 International best practice | <p>WDEPC resources</p> <p>External consultants for EMS implementation</p> <p>Accredited certification consultants will be required for ISO certification.</p> <p>Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and the Environmental Manager of NDPP.</p> | <p>6 -12 months for development of a formal EMS system</p> <p>Within 2 years certification</p> <p>Annual EHS Report to the Bank</p> | <p>Develop and implement an EMS</p> <p>Attain ISO 14001 or equivalent certification latest within 2 years of commissioning of NDPP</p> | <p>There is a functioning EMS system in place at DPP (responsibilities; training; procedures; records) which could be an ideal basis for an ISO based and certified system for both DPP and NDPP.</p> |

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| 1.2 | Environmental Manager Appoint a qualified Environmental Manager for the NDPP construction phase and subsequent plant operation. This function can be combined with H&S | Optimisation of environmental performance of NDPP | EBRD PR1 Legal requirement and best practice | WDEPC resources Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager). | Immediate | Minimisation of incidents (ideally zero incidents) during construction and later plant operation | To be put in place for NDPP |
| 1.3 | Training Develop and implement a staff environmental training plan for the new project. | Benefit: Avoidance/minimisation of environmental incidents and associated liability | EBRD PR1 International best practice | WDEPC resources Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and the Environmental Manager of NDPP. | Immediate Completion of training prior to the start of site works | Minimisation of incidents (ideally zero incidents) during construction and later plant operation | Staff of DPP receive training and WDEPC has training facilities |

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| 1.4 | <p>Contractor Management</p> <p>Develop and implement and contractor control and management system for the new project.</p> <p>Provide training and supervision of Contractors working on-site and off-site; this is to include dust mitigation; noise reduction (e.g. limitation of working hours) and traffic control (routing of lorries; driver training; speed restrictions)</p> <p>Continue active contractor management during operational phase of NDPP</p> | Benefit: Avoidance/minimisation of environmental incidents and associated liability | EBRD PR1 International best Practice | WDEPC resources Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and responsibility of the Environmental Manager of NDPP. | Develop a training program prior to start of works. Training to be provided as contractors are employed | Minimisation of incidents | To be put in place for NDPP |

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| 1.5 | <p>Incident Response Team Train a response team for environmental incidents during demolition and construction (mainly for oil spillages to soil and accidental discharges into the canals). Ensure that the team is available during all working hours.</p> | <p>Benefit: Avoidance/minimisation of environmental incidents and associated liability</p> | <p>EBRD PR1 International best Practice</p> | <p>WDEPC resources Responsibility of the NDPP Project Manager and the Environmental and H&S Manager of NDPP</p> | <p>Team to be put together and trained prior to start of NDPP site works</p> | <p>Immediate response in case of accidents/incidents</p> | <p>To be put in place for NDPP</p> |

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| 1.6 | <p>New Projects and Associated Projects</p> <p>All new projects which require an EIA to include a Non-Technical Summary (NTS); a Stakeholder Engagement Plan (SEP); and an Environmental and Social Action Plan (ESAP). The NTS, SEP and ESAP are to be disclosed locally and on the internet.</p> | <p>Benefits:</p> <p>Avoidance of risk</p> <p>Improved relationship with the affected population</p> | EBRD PR1 | <p>WDEPC resources and ESIA Consultants</p> <p>Responsibility of WDEPC</p> | As projects are identified and as required for permitting | No objections or delays to projects | <p>This action applies to projects associated with NDPP (14.5 km HV line; 60 km HV line; 4 km gas pipeline). They are scheduled to have ESIA's carried out this year, in compliance with national requirements and policies of funding IFIs.</p> |
| 1.7 | <p>Grievance System</p> <p>Implementation of grievance/complaints response system to address any issues brought forward by stakeholders</p> | <p>Benefits:</p> <p>Avoidance of risk</p> <p>Improved relationship with the affected population</p> | <p>EBRD PR1 and 10</p> <p>International best Practice</p> | <p>WDEPC resources</p> <p>Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and of the NDPP Environmental Manager.</p> | Immediate | No complaints; early resolution of issues with local residents and stakeholders | This will be part of the EMS |

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| 1.8 | <p>Audits</p> <p>Carry out an independent audit at NDPP commissioning stage to assess compliance with performance targets.</p> <p>As part of the EMS carry out annual environmental audits to measure progress against annual targets.</p> <p>Every 5 years commission an independent environmental and social audit to review performance and assess compliance.</p> | <p>Benefits:</p> <p>Reduction of risks</p> <p>Assurance of legal compliance</p> <p>Assurance of compliance with EBRD requirements</p> | <p>EBRD PR1</p> <p>International best Practice</p> | <p>For annual audits internal (WDEPC) staff; for audits every 5 years use independent consultants</p> <p>Responsibility of WDEPC and the NDPP Project Manager (after commissioning, the NDPP Station Manager), and the Environmental Manager of NDPP.</p> | <p>At commissioning stage and from then on regularly (annually and every 5 years respectively)</p> | <p>Compliance with EBRD requirements, BAT and legal compliance requirements and internally set improvement targets.</p> | <p>The existing Damanshour power station is subject to compliance checks by authorities.</p> <p>There is no system of regular independent E&HS performance audits</p> |

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| PR2 | Labour and Working Conditions | | | | | | |
| 2.1 | <p>H&S Management</p> <p>Develop and implement an occupational health and safety management system based on OHSAS.</p> <p>This is needed for site works (demolition and site clearance; construction) and subsequent operation of NDPP.</p> <p>This is to include a dedicated H&S Manager appointed for the construction phase and plant operation.</p> | <p>Benefit: Optimisation of H&S management through a formalized system</p> | <p>EBRD PR2</p> <p>Voluntary and best practice</p> | <p>WDEPC resources</p> <p>Consultants for setting up an EMS</p> <p>Consultants for certification</p> <p>Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and the H&S Manager of NDPP</p> | <p>Immediately</p> <p>6 months for development of a formal EHS</p> <p>2 years for OHSAS certification</p> <p>Annual EHS Report to the Bank</p> | <p>Operate an efficient H&S Management System (less incidents/accidents)</p> <p>OHSAS or equivalent certification</p> | <p>There is a functioning H&S management system in place at DPP (responsibilities; training; procedures; records) which could be the basis for an OHSAS/ ISO based and certified system for both DPP and NDPP.</p> |

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| 2.2 | H &S Training Develop and implement a staff H&S training plan for new staff. (This can be combined with environmental training). | Benefit: Avoidance/minimisation of accidents and associated liability | EBRD PR2 Legal requirement International best Practice | WDEPC resources Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and the H&S Manager of NDPP | Modify existing training procedures and plans | All staff trained prior to start of work | To be put in place for NDPP |
| 2.3 | Contractor Training and Supervision Assess training needs for contractors and provide training as required, particularly during site clearance and construction works. | Benefit: Avoidance/minimisation of accidents and associated liability | EBRD PR2 Legal requirement International best Practice | WDEPC resources Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and the H&S Manager of NDPP | From start of demolition/construction works | All contractors trained/instructed before start of work | To be put in place for NDPP |

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| 2.4 | <p>Use of Personal Protective Equipment</p> <p>Assess the need for use of PPE for each job (permanent and temporary staff; contractors) on the NDPP project. Provide adequate PPE as required. Regularly control and enforce use of PPE.</p> | Benefit: Avoidance/minimisation of accidents and associated liability | EBRD PR2 Legal requirement International best Practice | WDEPC resources Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and the H&S Manager of NDPP | From start of demolition/costruction works | Target is zero accidents | To be put in place for NDPP |

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| 2.5 | <p>Machinery/Equipment</p> <p>Ensure that all machinery used during demolition and construction fully complies with national environmental and health and safety standards, This is particularly important for noise (noise levels on site not to exceed 85 dB).</p> <p>Regularly monitor noise levels and mitigate as appropriate (e.g. construction of noise barriers; shielding of machinery).</p> <p>Ensure that all staff exposed to noise (inclusive of contractors) use adequate PPE.</p> | Benefit: Avoidance/minimisation of accidents and associated liability | EBRD PR2 Legal requirement International best Practice | WDEPC resources Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and the H&S Manager of NDPP | To be part of equipment specifications ; monitoring of noise and use of PPE from start of works. | Target is avoidance of complaints and claims from staff, contractors and local residents | To be put in place for NDPP |

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| 2.6 | <p>Dust</p> <p>Ensure that working practices during demolition and construction include dust (e.g. damping down dust with water during excavation). Control dust emissions regularly and modify working practices as required.</p> <p>Ensure that all staff exposed to dust (inclusive of contractors) use adequate PPE.</p> | Benefit: Avoidance/minimisation of nuisances/accidents and associated liability | EBRD PR2 Legal requirement International best Practice | WDEPC resources Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and the Environmental and H&S Managers of NDPP | From start of works onwards | Target is avoidance of complaints and claims from staff, contractors and local residents | To be put in place for NDPP |

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| 2.7 | <p>Traffic during Construction</p> <p>Prepare a detailed plan for site traffic, particularly heavy lorries during demolition and construction.</p> <p>Make use of the results and recommendations of the traffic study done for the ESIA.</p> <p>Instruct and monitor all contractors and their drivers; ascertain that all drivers have the correct licenses and are trained for this project.</p> | Benefit: Avoidance/minimisation of accidents and associated liability | EBRD PR2 Legal requirement International best Practice | WDEPC resources Responsibility of the NDPP Project Manager and the Environmental and H&S Managers of NDPP | Plan to be ready before start of works, for instruction/trainings | Target is avoidance of accidents, complaints and claims | To be put in place for NDPP |
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| PR3 | Resource Efficiency and Pollution Prevention and Control | | | | | | |
| 3.1 | <p>Regular Environmental Performance Checks and Key Performance Indicators (KPIs)</p> <p>After commissioning of NDPP, carry out annual technical performance assessments aimed to increase efficiency and reduce emissions and discharges</p> <p>Based on BAT develop a set of key technical performance indicators for NDPP und use those for technical assessments. Review KPIs annually.</p> | <p>Benefits:</p> <p>Optimisation of combustion technology and emission control technology</p> | <p>EBRD PR3</p> <p>International best Practice</p> | <p>WDEPC resources and specialist technical staff providing equipment maintenance services</p> <p>Responsibility of NDPP Station Manager and Environmental and H&S Managers of NDPP</p> | <p>From commissioning onwards, as part of regular services (but not less than once per year)</p> | <p>Compliance with BAT</p> | <p>To be put in place for NDPP; this is also an integral part of the EMS (continual improvement)</p> |

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| 3.2 | Decommissioning of 3x65 MWe units Ensure that these three units are decommissioned as part of the project. | Benefit: Reduction of emissions (notably SO2, NO2 and particulates) | EBRD PR3 International best Practice | Removal by contractors Responsibility of WDEPC | Not later than by commissioning of NDPP | Reduced emissions | This is part of the NDPP project |

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| 3.3 | <p>Solid Waste Disposal</p> <p>Prepare a detailed disposal plan for solid (non hazardous) waste from site clearance and ground preparation for NDPP.</p> <p>Ensure disposal is in compliance with national requirements and keep a detailed log of wastes, volumes and disposal routes (inclusive of ultimate disposal site).</p> <p>Recycle wastes where possible.</p> <p>Continue good practised during operations of NDPP (part of EMS)</p> | Benefit: Avoidance/minimisation of environmentally dangerous disposal and associated liability | EBRD PR 3 Legal requirement International best Practice | WDEPC resources Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and the Environmental Manager of NDPP | Disposal plan, procedures and trained staff to be ready at start of site works | Target is legal compliance and avoidance of fines or claims for clean-up | To be put in place for NDPP |

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| 3.4 | <p>Hazardous and Toxic Wastes</p> <p>Prepare a detailed disposal plan for hazardous and toxic wastes (e.g. oils; asbestos) arising from site clearance. Ensure disposal in compliance with national requirements and keep a detailed log of wastes and disposal routes.</p> <p>Similarly, control and manage wastes during NDPP operation (this is part of the EMS).</p> | <p>Benefit: Avoidance/minimisation of environmentally dangerous disposal and associated liability</p> <p>Legal compliance</p> | <p>EBRD PR3</p> <p>Legal requirement</p> <p>International best Practice</p> | <p>WDEPC resources</p> <p>Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and the Environmental Manager of NDPP</p> | <p>Start of works</p> | <p>Target is legal compliance and avoidance of fines or claims for clean-up</p> | <p>To be put in place for NDPP</p> |

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| 3.5 | <p>Emission Monitoring</p> <p>As part of the EMS (and in compliance with national regulatory requirements and in line with the design specifications of NDPP) implement and operate a continuous emissions monitoring system during the operation of NDPP.</p> | Benefit: Allows effective control of emission levels and prevents accidental illegal emissions and associated liabilities | EBRD PR1 and 3 Legal requirement International best Practice | WDEPC resources At commissioning, the NDPP Project Manager. Later the Station Manager and the Environmental Manager of NDPP | To be fully operational at commissioning of NDPP | Compliance with legal requirements | To be put in place for NDPP |

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| 3.5 | <p>Noise Monitoring and Reduction at DPP</p> <p>Noise levels originating from the older units are at times exceeding national legal limits and are high in comparison to modern plant. Investigate options for noise reduction or shielding and implement reasonable measures.</p> | <p>Benefit:</p> <p>Legal compliance</p> <p>Avoidance of complaints from local residents</p> | <p>EBRD PR3</p> <p>Legal requirement</p> <p>Best international practice</p> | <p>Independent external specialist are required for regular noise measurements</p> <p>There is potentially the need for structural improvements (noise barriers) or better equipment with lower noise emissions.</p> <p>Responsibility of WDEPC and the DPP Station Manager.</p> | Immediate | No complaints and full legal compliance | To be put in place at the existing power plant (there were complaints made during the ESIA consultation meetings) |

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| PR4 | Public Health and Safety | | | | | | |
| 4.1 | <p>Impacts on the Neighbourhood</p> <p>As part of the EMS carry out regular assessments of the impact of (i) demolition and building works and later (ii) operation of NDPP on the residential areas close to the power station. Key issues are noise, traffic (heavy lorries) and dust emissions.</p> | <p>Benefit: Avoidance/minimisation of incidents and associated liability</p> <p>Better relationship with local residents</p> | International best Practice | <p>WDEPC resources</p> <p>During construction responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and the H&S and Environmental Managers of NDPP.</p> | From start of site works | Legal compliance and avoidance of fines and claims | To be put in place for NDPP; see also Action 3.5 |

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| 4.2 | <p>Community Advisory Panel</p> <p>Ensure that local residents are fairly represented.</p> <p>Put in place a system of regular meetings of the Panel.</p> <p>Ensure that these meetings and their results are immediately and effectively dissipated to the local community.</p> | <p>Benefit:</p> <p>Good relationship with stakeholders</p> | <p>EBRD PR4</p> <p>International best Practice</p> | <p>WDEPC resources</p> <p>During construction responsibility of the NDPP Project Manager; during subsequent operation of NDPP responsibility of the Station Manager of NDPP</p> | <p>To be implemented now</p> | <p>Target is an effective response to effective stakeholder engagement and avoidance of grievances or claims</p> | <p>CAP is already established</p> |
| 4.3 | <p>Grievance Procedure</p> <p>Put in place an effective grievance procedure for neighbours and other stakeholders in the project.</p> <p>Ensure that grievances are dealt with speedily, effectively and fairly.</p> | <p>Benefit:</p> <p>Good relationship with stakeholders; helps to de-fuse disagreements and avoid liability claims</p> | <p>EBRD PR4</p> <p>International best Practice</p> | <p>WDEPC resources</p> <p>During construction responsibility of the NDPP Project Manager; during subsequent operation of NDPP responsibility of the Station Manager of NDPP</p> | <p>Immediate</p> | <p>Target is zero complaints</p> | <p>To be put in place for NDPP</p> |

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| 4.4 | <p>Traffic outside NDPP during Construction</p> <p>Provisions of adequate training of drivers to familiarize them with the narrow and congested roads in the Nile Delta.</p> <p>Instruction to use the International Highway for transport from the Port Said and Damietta ports to the power plant.</p> | <p>Benefit: Avoidance/minimisation of accidents and associated liability</p> | <p>International best Practice</p> | <p>WDEPC resources</p> <p>Responsibility of the NDPP Project Manager and the Environmental Manager of NDPP.</p> | <p>Completion of training to be a condition for work on the project (on and off-site)</p> | <p>Target is zero accidents and zero complaints</p> | <p>To be put in place for NDPP</p> |

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| PR5 | Land Acquisition, Involuntary Resettlement and Economic Displacement | | | | | | |
| 5.1 | Livelihood Restoration Plans and Resettlement Plans EBRD PR 5 applies to the associated infrastructure projects (HV lines; gas pipeline). | Benefit: Avoidance of risk Improved relationship with local population | PR1 and 5; EIA required for the pipeline and grid connections under national law; International best practice | EIAs are the responsibility of GASCO and EETC. | ESIA's are scheduled for 2015; WDEPC to check with EETC and GASCO for compliance with this legal requirement | Check status of EIAs and compliance with permitting requirements with GASCO and EETC and their consultants. NDPP/WDEPC need to check compliance of ESIA procedures with EBRD requirements. | EETC and GASCO are in the process of hiring consultants for due diligence/ESIA's. |
| 5.2 | Commission an Independent Check of the Implementation of Stakeholder Engagement Plans; Resettlement Plans; and Livelihood Restoration Plans This relates to the associated infrastructure projects | Benefit: Compliance with legal national and Lender requirements Improved relationship with affected communities | EBRD PR5 International best practice | NDPP/WDEPC need to check ESIA's of the three associated projects for any such plans and then for their effective implementation. This should be done by a qualified independent consultant | Check progress on ESIA's; independent audit when such plans are implemented | Compliance; avoidance of complaints | To be put in place for NDPP |

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| PR6 | Biodiversity and Living Natural Resources | | | | | | |
| 6.1 | <p>Accidental Damage to Habitats</p> <p>Although this is an industrial site with no biodiversity value, negative impacts on the surrounding area (land and adjacent canals) can occur, e.g. caused by accidental discharges into the canals. Working practices, training of staff, and incident response plans need to consider this.</p> | Risk of non-compliance and fines | PR6 Legal national compliance | NDPP Project Manager (later NDPP Station Manager) and NDPP Environmental Manager | From start of site works up to and inclusive of operation of NDPP | No accidental discharges into the canals | To be done for NDPP |
| PR7 | Indigenous People | | | | | | |
| 7.1 | Not applicable | | | | | | |
| PR8 | Cultural Heritage | | | | | | |
| 8.1 | Not applicable | | | | | | |

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| PR10 | Information Disclosure and Stakeholder Engagement | | | | | | |
| 10.1 | Stakeholder Engagement Plan Implement the SEP and develop an effective system to communicate and work with stakeholders. See also Actions 4.2 Community Advisory Panel (CAP) and Action 4.3 Grievance Procedure | Benefit: Improved relationship with local stakeholders | EBRD PR10 | WDEPC resources Responsibility of the NDPP Project Manager (after commissioning, the NDPP Station Manager) and the Environmental Manager of NDPP | Immediate | No complaints | Continuing stakeholder information and engagement are existing commitments of WDEPC; the CAP provides the formal forum |