

<b>No.</b>	<b>Action</b>	<b>Source of requirement</b>	<b>Date required</b>	<b>Target and Evaluation Criteria For Successful Implementation<sup>1</sup></b>
0	Submit report to the Bank on environmental, social, health and safety performance, including status of each ESAP element and other agreed activities.	EBRD	- Each six months during construction - Annually during operation	Submission of reports on schedule and in a mutually agreed format.
<b>1</b>	<b>PR 1: Environmental and social management</b>			
1.1	Ensure that the Project Implementation Unit (PIU) and PIU Consultant have sufficient capabilities to address environmental, occupational health and safety, and social (ESHS) issues associated with the project and to ensure appropriate EHS management of contractors.	Best practice EBRD PR 1	All times during PIU and PIU Consultant function	- Clear ESHS requirements specified in Terms of Reference for PIU Consultant selection - Qualified ESHS personnel available at PIU and PIU Consultant - Qualifications submitted with first relevant report to the Bank (in line with ESAP item 0)
1.2	Appoint and maintain on-site a person to be responsible for ESHS compliance, to report directly to the project manager, and to WPY management.	Best practice EBRD PR 1	Appoint prior to construction initiation. Maintain permanently during construction and operation	- Appointment of qualified person - Qualifications submitted with first relevant report under ESAP item 0 - Responsible person maintained at all times
1.3	Establish and implement corporate policy and procedures for oversight of contractor ESHS performance during construction, to include (at a minimum): - ESHS procedures and system for compliance reporting and monitoring; - Inclusion of appropriate Environmental and Social Management Plan (ESMP) and legal requirements in contracts/subcontracts, including requirement for staff/management training. - Assignment of clear responsibilities within WPY for contractor oversight - Regular inspections of contractors' construction	Best practice EBRD PR 1	Prior to entry into EPC contracts/subcontracts	Include in ESHS reports to Bank: - Program description and implementation status - Summaries of project and contractor - ESHS performance

<sup>1</sup> Items required to be reported to the Bank will be included in the semi-annual or annual reports required under ESAP item or as specifically indicated within this column.

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	<p>operations.</p> <ul style="list-style-type: none"> <li>- Contractor reports on performance sufficient to allow inclusion of data in ESHS reports to the Bank, and to allow WPY PIU to determine if corrective actions are needed.</li> <li>- Verification of training and professional qualifications for contractor ESHS managers and staff.</li> </ul>			
1.4	Develop and implement integrated environmental, social, and occupational health and safety management system at WPY	Best practice EBRD PR 1	<ul style="list-style-type: none"> <li>- Develop systems prior to operation phase of the project</li> <li>- Implement all time throughout project operation</li> </ul>	<ul style="list-style-type: none"> <li>- System developed by qualified consultant, staff trained, system implemented.</li> <li>- Status reported in each report to Bank</li> </ul>
1.5	Implement the environmental and social monitoring and management plan (ESMP), an integrated part of the ESIA Addendum Report	EBRD PRs	As required by ESMP	Report to Bank on highlights of implementation
<b>2</b>	<b>PR 2: Labour and working conditions</b>			
2.1	Develop a formal grievance mechanism for employees and contractors and disseminate information about its uses to the workforce, in the language(s) of the workers (note: this is separate from the stakeholder grievance mechanism required under PR10)	EBRD PR 2	Develop and implement prior to construction and throughout project lifetime	<ul style="list-style-type: none"> <li>- Submission to Bank (with first report under item 0) of grievance procedure for review and approval</li> <li>- Thereafter, report to Bank to include all worker grievances and resolutions</li> </ul>
2.2	<p>Develop and implement an occupational health and safety (OHS) plan to guide all activities on project sites during site preparation, construction, and operation. Also require contractor plan/compliance. Requirements to include (but not to be limited to):</p> <ul style="list-style-type: none"> <li>- Job and task specific hazard analysis and controls for all activities</li> <li>- Mandatory reporting by contractors</li> <li>- Requirements for and enforcement of PPE use</li> </ul>	Best practice EBRD PR 2	Prior to initiation of contractor activities on-site	<ul style="list-style-type: none"> <li>- Confirmation of WPY plan by EBRD</li> <li>- Availability of contractor OHS plans approved by WPY or by independent OHS professional</li> <li>- Reports to Bank on OHS issues, statistics and training delivered</li> <li>- Reports to Bank on major accidents</li> </ul>

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	<ul style="list-style-type: none"> <li>- Safety training for personnel</li> <li>- Review and approval of contractors' OHS plans</li> <li>- Maintain statistics of total work hours, lost time incidents, injuries, near misses etc.</li> </ul>			
2.3	Employ workers from local population whenever possible. Establish and meet goals for local hires, advertise locally for all open positions.	EBRD PR 2 Best practice Kazakhstan Law	Permanently during construction and operation	<ul style="list-style-type: none"> <li>- Availability of local announcements when hiring</li> <li>- Number of employees/contractor workforce selected from local population</li> </ul>
2.4	Provide workers accommodation in line with the Guidance Note on Workers' Accommodation (EBRD and IFC, 2009)	EBRD PR2 Best practice	Permanently during construction	Workers' accommodation conditions compliant with guidance note
<b>3</b>	<b>PR 3: Pollution prevention and abatement</b>			
3.1	Develop and implement solid waste management plan for all wastes, including spent oils, construction debris, domestic/household solid wastes. Ensure that disposal is by licensed companies and to licensed facilities	EBRD PR1, PR3 Best practice Kazakhstan Law	<ul style="list-style-type: none"> <li>- Develop: prior to start of construction</li> <li>- Implement: throughout project lifetime</li> </ul>	<p>Development:</p> <ul style="list-style-type: none"> <li>- Review and/or approval of plan by authorities, if required</li> <li>- Require compliance with wastes management plan in all contracts</li> <li>- Report to Bank on status of plan and approval</li> </ul> <p>Implementation:</p> <ul style="list-style-type: none"> <li>- All wastes managed in accordance with approved plan</li> <li>- Reports to authorities as required in permits</li> <li>- Reports to WPY PIU by all contractors on quantities, types, and management of all solid wastes</li> <li>- Reports to Bank on quantities, types, and management of all solid wastes</li> <li>- Immediate report to Bank and relevant authorities of significant</li> </ul>

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				incidents and response actions
3.2	Implement management practices for dust abatement: <ul style="list-style-type: none"> <li>- Watering of roads during dry periods, with priority and increased frequency for road sections nearby residential areas</li> <li>- Define and enforce maintaining speed limits by construction traffic</li> <li>- Cover loads on trucks to prevent dust generation</li> </ul>	EBRD PR 3 Best practice	All time during construction	Report to Bank on implemented dust control activities
3.3	Develop and implement erosion control for all areas where the ground will be disturbed during construction including at a minimum: <ul style="list-style-type: none"> <li>- Minimize disturbance on slopes and in/near water</li> <li>- Repair ruts and other features caused by work in wet weather</li> <li>- Segregate topsoil from subsurface material and store</li> </ul>	EBRD PR 3 Best practice	<ul style="list-style-type: none"> <li>- Erosion control plan available prior to construction initiation</li> <li>- Erosion control implementation throughout relevant construction stages</li> </ul>	Erosion control plan available and provided to the Bank for review Report to Bank on erosion control plan implementation
3.4	Provide portable toilets or other means to contain sanitary wastes as needed, at all work locations. Discharge wastes to appropriate treatment as required by authorities.	EBRD PR 3 Best practice	All times during construction and operation	<ul style="list-style-type: none"> <li>- No unauthorized discharges</li> <li>- No releases of untreated sanitary wastes</li> <li>- Report to Bank on any accidental releases/discharges</li> </ul>
<b>4</b>	<b>PR 4: Community health, safety, and security</b>			
4.1	Develop and enforce implementation by contractors of procedures to protect public health and safety. Procedures to include (but not to be limited to): <ul style="list-style-type: none"> <li>- Traffic management plan for contractors (speed limits, training, traffic routes, avoidance of sensitive areas)</li> <li>- Public notice of construction operations in areas open to the public</li> <li>- Security as needed to prevent unauthorized access to project locations, with appropriate training for security personnel</li> </ul>	EBRD PR 4 Best practice	<ul style="list-style-type: none"> <li>- Develop procedures: prior to construction initiation</li> <li>- Implement: all time during construction</li> </ul>	<ul style="list-style-type: none"> <li>- Submission of procedures to Bank for review</li> <li>- Public notices, hazard signs, barriers available</li> <li>- Report to Bank on traffic management, security, other activities, including any incidents/accidents involving the public</li> </ul>

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	<ul style="list-style-type: none"> <li>- Measures to minimize disruption and closures of public access to grazing areas</li> <li>- Hazard notices/signs/barriers to prevent access to hazardous project areas</li> <li>- Notice to nearby residents and local authorities before major activities and traffic</li> </ul>			
4.2	Perform noise monitoring in residential areas from south-east of Yereymentau to define baseline conditions.	EBRD PR4 Best practice	Prior to construction initiation but not later than Q2 2015	- Noise monitoring preformed. Report submitted to Bank
4.3	Perform noise monitoring in residential areas from south-east of Yereymentau during operation. In case of exceedance of regulatory threshold levels due to Project operation, identify and implement applicable mitigation.	EBRD PR4 Best practice	First year of operation	<ul style="list-style-type: none"> <li>- Noise monitoring preformed. Report submitted to Bank</li> <li>- If applicable, mitigation identified, and implemented.</li> </ul>
<b>6</b>	<b>PR 6: Biodiversity conservation and sustainable management of living natural resources</b>			
6.1	Develop biodiversity survey methodology and program to allow mapping of protected species of flora including Red List species and mapping of the habitats of protected terrestrial fauna at the site.	EBRD PR 6 Best practice	Survey methodology and program available by February 2015 to allow survey performance in all relevant seasons of 2015	<ul style="list-style-type: none"> <li>- Methodology and program available and approved by qualified EBRD expert</li> <li>- Methodology and program submitted to Bank with first relevant report under ESAP item 0</li> </ul>
6.2	Undertake biodiversity survey (flora and fauna, including birds/bats) at the site. Data must be sufficient to inform Project's detailed design (prepared by EPC contractor) to avoid impacts on national Red Book and IUCN Red List species. Update ESMP in response to survey outcomes and prepare Biodiversity Management Plan (BMP).	EBRD PR 6 Best practice	<ul style="list-style-type: none"> <li>- Terms of Reference and experts selection is agreed with EBRD. Survey to cover relevant seasons of 2015</li> <li>- Updated ESMP available by Q3, 2015</li> <li>- BMP is agreed by Q4, 2015</li> <li>- EPC contractor to implement BMP and ESMP</li> </ul>	<ul style="list-style-type: none"> <li>- Survey reports prepared by qualified experts</li> <li>- Biodiversity Management Plan in place and implemented by WPY</li> <li>- Updated ESMP in place</li> <li>- Survey report, GIS mapping of flora and habitats and updated ESMP submitted to Bank for approval with first relevant reports under ESAP item 0</li> </ul>

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6.3	Perform operational phase bird and bat monitoring including carcass searches. Performed during operation years 1 and 2. Pending on monitoring outcome, option to extend program to part of or all of years 3, 5, 10, 15.	EBRD PR 6 Best practice	During operation, in line with defined methodology and program.	<ul style="list-style-type: none"> <li>- Survey reports available and approved by qualified independent expert.</li> <li>- Updated ESMP in place</li> <li>- Survey reports, and updated ESMP submitted to Bank with first relevant reports under ESAP item 0</li> </ul>
6.4	Establish and enforce rules for workers to prohibit hunting, and wood-cutting except as allowed with lawful permits	EBRD PR 6 Kazakhstan law	At all times during construction and operation	<ul style="list-style-type: none"> <li>- No violations of hunting and, wood-cutting regulations</li> <li>- Report to Bank on actions taken to control worker behaviour, including incidents</li> </ul>
<b>8</b>	<b>PR 8: Cultural heritage</b>			
8.1.	Appoint independent expert to perform cultural heritage assessment based on review of secondary data sources. Perform visual inspection of relevant site areas if initial research indicates necessity. Perform cultural heritage discharge in line with applicable national law, if required.	EBRD PR 8 Kazakhstan law	Prior to construction initiation but not later than Q3 2015.	Assessment report available and submitted to Bank with first relevant report under ESAP item 0.
8.2	Develop and implement a chance finds procedure. Chance finds procedure to be part of project management system and procedures implemented by contractors. Training of relevant contractor staff to include chance finds procedure implementation. Appoint licences archaeologist to supervise field works at relevant locations if assessment under 8.1 indicate necessity.	EBRD PR 8 Kazakhstan law	Procedure in place prior to construction initiation	Report to Bank on highlights of chance find procedure implementation and on any discoveries made.
<b>10</b>	<b>PR10: Stakeholder engagement</b>			
10.1	Implement Stakeholder Engagement Plan, including stakeholder grievance mechanism and notice to authorities and residents of major construction events	EBRD PR 10 Best practice	On ongoing basis during construction and operation	<ul style="list-style-type: none"> <li>- Report to Bank on consultation activities, including notices given</li> <li>- Report to Bank on all grievances</li> </ul>

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				received and how addressed/ resolved
10.2	Update the Stakeholder Engagement Plan during lifecycle of the project	EBRD PR 10 Best practice	Prior to construction Prior to operation	Stakeholder Engagement Plan updated and complied with during construction and operation phase.
10.3.	Report on a regular basis to community on project progress status, and progress in the implementation this ESAP	EBRD PR 10 Best Practice	Semi-annually during construction and annually during operation	- Report to Bank on consultation activities - Report to communities on status