

**ACWA Power: Sirdarya CCGT, Uzbekistan
Environmental and Social Action Plan (ESAP) – October 2020**

No	Action	Deliverable	Timetable Action Due Date
PS 1	Assessment and Management of Environmental and Social Risks and Impacts		
1.1	The Project shall produce an HSSE Policy, based on ACWA Power’s existing HSSE Policy; and fully aligned with the Performance Standards.	HSSE Policy	Prior to Financial Close.
1.2	Incorporate the requirements for Environment, Health, Safety and Social (EHSS) management (including HR and gender based violence or harassment (GBVH) policies) into contract documents.	Sub-contractor clauses setting out EHSS, labour and HR requirements included in the tender documentation	On-going and upon appointment of contractors
1.3	Obtain the necessary outstanding permits prior to commencements of activities for which the permits are required. These shall be inclusive of, but not limited to: <ul style="list-style-type: none"> ▪ Construction Permit(s) (following camps plan submission); ▪ Permit(s) for stationary air pollution sources; ▪ Permit(s) for water use; ▪ Permit(s) of temporary and permanent land use; and ▪ Permit(s) for use of foreign workers. If there are any design changes, obtain the necessary permits again prior to commencements of activities for which the permits are required.	Checklist of all required permits required for the Project, construction- and operational-phases, included within the Project’s Management System (see ESAP Item 1.7) Correspondence with regulatory bodies and copies of all applicable permits and certificates	Pror to activities for which authorisations are required; particularly commencement of construction activities.
1.4	Establish an EHSS incident reporting procedure (or equivalent) to maintain records of monitoring, accidents and incidents (including near-misses). Procuedure must include and auditable investigation procedure, including Corrective Action Reporing (CAR) system.	Format for EHSS Reports, including reporting of incidnets and near-misses	Prior to commencement of construction.
1.5	Prepare an <i>Influx Management Plan</i> , in accordance with IFC Publication, <i>Projects and People: A Handbook for Addressing Project-induced In-migration</i> .	Influx Management Plan	Prior to commencement of construction.
1.6	Workers accommodation facilities should be designed to meet regulations and the requiremetns of <i>Workers’ Accommodation: Processes and Standards; A guidance note by IFC and the EBRD, September 2009</i> . The plan should also detail prioritisation of workers for housing on the worker accommodation site; and also, integrate actions from the COVID-19 Risk Assessment (see ESAP Item 4.1).	Workers Accommodation Plan	Prior to commencement of construction works.
1.7	Establish and Implement Environmental, Health & Safety (EHS) management system consistent with the requirements of ISO 14001 and ISO 45001. The EHS Management System shall be prepared to cover the construction-, commissioning- and operational-phase of the Project. The CESMP, CoESMP and OESMP will include plans, procedures, checklists, etc. as required to ensure adequate implementation of the ESMS. The anticipated suite of Management Plans are provided under the ESIA Volume 3, and include: (i) waste management plan; (ii) occupational health and safety plan; (iii) emergency preparedness and response; (iv) hazardous materials handling and storage; (v) environmental monitoring plan; (vi) traffic management plan; (vii) security management plan; and (viii) chance find procedure.	Project-level EHS Management System	Prior to commencement of Construction
		Construction-phase Environmental & Social Management Plan (CESMP) submitted to Lenders, reviewed and approved.	Prior to commencement of Construction.
		Commissioning-phase Environmental & Social Management Plan (CoESMP)	Prior to commencement of Commissioning
		Operational-phase Environmental & Social Management Plan(OESMP)	By Early Power Period Commissioning
1.8	Undertake independent audits of construction activities by EHSS and Labour specialists.	Audit reports	Quarterly during Construction
1.9	Undertake independent audits of operation activities by EHSS and Labour specialists.	Audit reports	Semi-annually for the first year of Operation, and annually thereafter.

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1.10	Project Company and EPC Contractor to appoint suitably qualified HSE Managers to be based on site during the construction phase.	Proposed management staff CVs and confirmation of number of HSE dedicated roles	Prior to commencement of construction
1.11	Appoint a site-based Community Liaison Officer (CLO) with appropriate skills and experience to effectively manage the implementation of the Stakeholder Engagement Plan.	CLO curriculum vitae	Prior to commencement of construction.
1.12	Develop a community development plan	Community Development Plan	Prior to Early Power Commissioning
PS2	Labor and Working Conditions		
2.1	Project to develop Human Resources (HR) policies and procedures to ensure that rights of employees are protected in accordance with the Uzbekistan Labour Code and Lender / MIGA Requirements.	HR Policy Statement	Prior to Financial Close.
2.2	The EPC Contractor shall appoint a HR Manager.	EPC HR Manager CV	Prior to commencement of construction.
2.3	Develop and implement a sexual harassment policy to prevent and address any form of violence or harassment, including any form of GBVH.	GBVH Policy	Prior to Financial Close.
2.4	Develop an employee Code of Conduct, and include in induction training. The Code of Conduct should inform workers of local rules, etiquette and cultural sensitivities; and set out expectations relating to potential anti-social behaviour (alcoholism) and the Project's GBVH Policy (ESAP Item 2.2)	Code of Conduct; Records of induction materials; and register of induction completion by Project staff, including sub-contractor staff.	Prior to Commencement of Construction Induction training ongoing
2.5	Ensure that the Project Company Grievance Mechanism is extended / cascaded across all workers involved in the Project, including the EPC Contractor and their Sub-contractor staff.	Evidence of adoption of Grievance Mechanism	Prior to Commencement of Construction.
2.6	Undertake a supply chain risk assessment, and during the procurement process, put in place a mechanism for checking the presence/absence of child labour, forced labour and high risks of significant safety issues, in the production of core materials and equipment.	Supply Chain Risk Assessment Specific tender clauses on the exclusion, and definition, of 'forced' and 'child' labour; together with requirements to undertake; monitoring; and verification.	Prior to Commencement of Construction.
2.7	Develop an Employment Policy Document (EPD) for construction phase The EPD document should build upon the Human Resource Policy (ESAP Item 2.1) and GBVH Policy (ESAP Item 2.2), and will address: <ul style="list-style-type: none"> ▪ Working conditions ▪ Terms of employment ▪ Informing workers about their rights ▪ Child Labour ▪ Forced labour ▪ Equal Opportunities/non-discrimination ▪ Workers organisations ▪ Workers accommodation Regulations and Workers' accommodation: processes and standards; (A guidance note by IFC and the EBRD, September 2009) ▪ Occupational Health and Safety ▪ Grievance mechanism for all workers on the project site. The EPD should include targets and procedures for recruitment of local workers where possible.	EPD First EPD implementation report	Prior to commencement of the construction activities. Within 3 months of commencement of construction

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2.8	The EPC Contractor shall develop a staffing plan, detailing the projected workforce throughout construction, including the number of staff at various skills levels.	Staffing Plan	Prior to commencement of construction.
PS3	Resource Efficiency and Pollution Prevention		
3.1	Develop an air quality monitoring plan which sets out locations and methodology	Air quality monitoring plan	Prior to commencement of construction.
		Commence Ambient Air Quality Monitoring in line with plan.	1 year prior to Early Power Commercial Operation Date.
		Monitoring report	At least annually after Project Commercial Operation Date.
3.2	Develop a noise monitoring plan and submit to Lenders for review.	Construction noise monitoring plan	Prior to commencement of construction.
		Operational noise monitoring plan	Prior to Early Power Commercial Operation Date.
3.3	Install continuous emissions monitoring systems (CEMS) on all emission stacks – main- and bypass-stacks.	Evidence of CEMS on all locations	Prior to plant commissioning.
3.4	Undertake annual GHG Emissions reporting for the Project	GHG Reports	Commencing on 31 January following Early COD 1 and then annually thereafter
3.5	Commission Audit within 1 year of Operation inclusive of: <ul style="list-style-type: none"> ▪ NOx emissions; ▪ noise; ▪ water use, impacts and strategy for reduction (including cooling technology optimisation, and reviewed risk analysis based on updated climate change projections); ▪ labour issues; ▪ Greenhouse Gas (GHG) emissions. 	Compliance Report and Improvement Plan.	Within 1 year of Project (CCGT) Commissioning; repeat audits every 5 years thereafter.
PS4	Community Health and Safety		
4.1	Prepare a COVID-19 Risk Assessment	COVID-19 Risk Assessment	Prior to commencement of construction.
4.2	Develop a traffic management plan	Traffic management plan	Prior to commencement of construction works.
4.3	Develop an occupational health and safety (OHS) management system including a detailed OHS Management Plan	OHS System and Management Plan	Prior to commencement of construction works.
4.4	Develop a comprehensive Emergency Preparedness and Response Plan	Emergency Preparedness and Response Plan	Prior to commencement of construction works.
4.5	Develop a comprehensive Community Health and Safety Management Plan	Community Health and Safety Management Plan	Prior to commencement of construction.
4.6	Develop a Security Risk Assessment and Security Management Plan aligned to the UN Code of Conducts for law enforcement officials, the IFC's <i>Good Practice Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts</i> ; and the UN Basic Principles on the use of Force and Firearms by law enforcement officials (where firearms are in use).	Security Risk Assessment and Security Management Plan	Prior to commencement of construction.
PS5	Land Acquisition and Involuntary Resettlement		
5.1	Undertake supplementary studies, including consultation and asset inventories, once the route of the overhead transmission line (OHLT) is finalized, and incorporate findings into the Livelihood Restoration Plan (LRP).	Supplementary studies and update of LRP	Prior to finalisation of LRP

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5.2	Undertake supplementary studies, including consultation and asset inventories, once the route of the gas pipeline is finalized, and incorporate findings into the LRP.	Supplementary studies and update of LRP	Prior to finalisation of LRP
5.3	Confirm requirement for the Health Protection Zone. In the event that this is required, undertake supplementary studies, including consultation and asset inventories, and incorporate findings into the LRP.	Written confirmation from the relevant authorities that the Health Protection Zone is not required; OR Supplementary studies and update of LRP	Prior to Project Commercial Operations Date
5.4	Develop, implement and regularly update the LRP; based upon the <i>Livelihood Restoration Plan Framework</i> which was prepared as part of the Project's disclosure.	LRP	As soon as possible, and at the latest, prior to commencement of construction.
PS6	Biodiversity Conservation and Sustainable Management of Living Natural Resources		
6.1	Work with JSC National Electric Networks of Uzbekistan to ensure that bird protection measures are included in the final design and implementation of the OHTL.	Written statement confirming the mitigation incorporated, including risk assessment to demonstrate that the residual impacts will not result in significant harm to biodiversity.	Prior to construction of Overhead Transmission Line.
PS8	Cultural Heritage		
8.1	Develop a chance find procedure	Chance find procedure	Prior to commencement of construction.