Environmental and Social Action Plan

Abbreviations

Acronym	Definition
CESMP	Construction Environmental and Social Management Plan
COD	Commercial Operation Date
CWMP	Construction Waste Management Plan
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EHS	Environment, Health and Safety
EP	Environmental Permit
EPC	EPC (Contractor) Engineering, procurement, and construction (Contractor)
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESG	Environment, Social and Governance
ESMP	Environmental and Social Management Plan (prepared as part of the ESIA process)
ESMS	Environmental and Social Management System
HR	Human resources
IFC	International Finance Corporation
ISO	international Standards Organization
KPIs	Key Performance Indicators
LARF	Land acquisition and resettlement framework
LRP	Livelihood restoration Plan
LTA	Lenders Technical Advisor
NEGU	J.S.C NEGU (Owner)
OHS	Occupational Health and Safety
OESMP	Operation Environmental and Social Management Plan
PIT	Project Implementation Team (NEGU)
PR	Performance Requirements
PS	Performance Standards
SEE	State Ecological Expertise
SEP	Stakeholder Engagement Plan

No.	Action required	Environmental and social risks (liability/benefits)	Requirements (legislative, EBRD PR, best practice)	Resources, investment needs, responsibility	Timeframe	Target and evaluation criteria for successful implementation
-	porate actions	0	EDDD DD4	NEOU	0	0
0.1	Develop and maintain a corporate EHS management system including corporate ESG Policy in line with international standards to enable the implementation of Project commitments on the Project.	Corporate reporting does not meet PR1 requirements	EBRD PR1 GIP	NEGU (Corporate) (operation) (own resources, supported by external consultants)	2 years post COD	Corporate EHS management system
0.2	Develop and implement a corporate ESG reporting on corporates sustainability reporting. This will include information on ESG performance, KPIs, such as, H&S, labor and gender report and statistics outlining positive employment actions and mechanism for promoting of women or other "vulnerable" groups in the Company & other relevant sustainability indicators.	Corporate reporting does not meet PR1 requirements	EBRD PR1 GIP	NEGU (Corporate) (Own resources, supported by external consultants)	2 years post COD	Corporate ESG reporting procedure and 1st annual reports
1 Ass	sessment and Management of Envir	onmental and Socia	l Impacts and Issu	ies		
1.1	Assign dedicated E&S responsible person for overseeing E&S obligations of this Environmental and Social Action Plan (ESAP) construction and operational	Adequate E&S oversight for the construction and operation phase	EBRD PR1	NEGU PIT (construction) NEGU (Regional Department) (operation)	Financial Close Pre-COD	Dedicated E&S responsible person - Name and contact details.

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	Environmental and Social Management plan (CESMP & OESMP) (including SEP).			(own resources, supported by external consultants)		
1.2	Develop a project level Environmental and Social Management Systems (ESMS) to oversee construction phase works including policies, procedures, forms for managing:	Optimization of environmental and social management though a formalized system	EBRD PR1 Aligned to ISO14001:2015 (or equivalent certified integrated management systems)	NEGU PIT (own resources, supported by external consultants)	Drafted prior to any site-mobilization	Project ESMP and supporting procedures, forms and templates outlining the ESMS (reviewed and accepted by the lender) Appended to EPC Contract ESMS Audit report
1.3	Develop Owner Permit Matrix	Compliance with	EBRD PR1	NEGU PIT	Positive conclusions	Permit matrix (Owners)

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	including: : A) Positive Conclusion of SEE for the national EIA report (Stage I and/or Stage II). B) Positive Conclusion of SEE for the national EIA report (Stage III)	national legislation Approved EIA/OVOS	National Law and Regulation	(development and construction) Regional NEGU department (operation)	from SEE at financing. Other permits prior to works on-site (construction) and prior to COD.	Positive conclusions from SEE Stage 1 Positive Conclusion of SEE for the national EIA report (Stage III)
1.4	Verify EPC Contract includes provisions for compliance with Project E&S standards including: • National law • EBRD ESP 2019	Regulatory and Lender compliance	Uzbekistan Standards and EBRD ESP	NEGU PIT (own resources, external consultants)	Pre-NTP	Signed EPC Contract Signed Sub-contracts
1.5	Establish construction phase ESMS for implementing the requirements of the ESIA and ESMP.	E&S compliance	EBRD PR1 Aligned to ISO14001:2015 and & ISO 45000 (or equivalent certified integrated management systems)	Main Contractor (own resources, external consultants)	42 days prior to site mobilization	E&S Policy, ESMS manual including supporting policies, procedures, method statements reviewed and accepted by the lender (e.g., aspects impact register and legal register, CESMP etc.)
1.6	Prepare and implement a Construction Environmental and Social Management Plan (CESMP) (including any relevant supporting sub-plans as defined by ESIA and	Optimization of environmental and social management though a	ESIA, ESMP EBRD PR1	Main Contractor (own resources, external consultants)	42 days prior to site mobilization	Documented CESMP

No.	Action required	Environmental and social risks (liability/benefits)	Requirements (legislative, EBRD PR, best practice)	Resources, investment needs, responsibility	Timeframe	Target and evaluation criteria for successful implementation
	ESMP)	structured management plan				
1.7	As part of the Contractor CESMP develop EHS monitoring program (contractor and subcontractor activities) including: OHS and E&S statistics (as per ESMP) Biodiversity mitigation and management Labor working conditions and procurement (including worker grievances) Labor accommodation Potential pollutant sources Security Continual oversight in working areas, alongside regular inspection, and audits. Verification of effective accident/incident reporting	Optimization of environmental and social management though a formalized system. Protection of environment and human health Reduced contractor related EHS risks. Protection of company reputation	EBRD PR1 EBRD PR3 EBRD PR4 National Air Pollution Control Regulation National Water Pollution Control Regulation	Main Contractor (own resources, external consultants)	42 days prior to site mobilization	E&S monitoring Program Records of regular inspection and audits, including (but not limited to) observation/non- conformity trackers, corrective action plans and evidence of actions being implemented. Records of contractor accidents/incident reporting.
1.8	Appoint site E&S team with relevant qualifications, defined roles and responsibilities, and authority. Site E&S team to include: H&S Manager, site environmental officer, site H&S officer (or combined EHS manager) for each Lot, HR officer, community liaison	Ensure implementation of E&S management plans	EBRD PR 1 (para 21)	Main Contractor (own resources, external consultants)	42 days prior to site mobilization	Organogram Terms of reference/job descriptions for key roles CV for the designated person(s) Evidence of appointment (contract)

No.	Action required	Environmental and social risks (liability/benefits)	Requirements (legislative, EBRD PR, best practice)	Resources, investment needs, responsibility	Timeframe	Target and evaluation criteria for successful implementation
	officer (CLO), Biodiversity monitor (site clearance and excavation works), project archaeologist.					
1.9	Develop Contractor Permit Matrix and obtain all required construction permits.	National compliance	EBRD PR1 National Law and Regulation	Main Contractor (own resources, external consultants)	42 days prior to site mobilization (construction phase)	Permit matrix Evidence of all relevant permits.
1.10	Organize E&S and OHS awareness training for all employees and sub-contractors.	Optimization of environmental and social management though a formalized system	EBRD PR1	Main Contractor (own resources, external consultants)	Construction phase	Documented training plan (matrix), training program (timeline) and records of training taking place (attendance) Training records.
1.11	1.Prepare Supply Chain Procurement Policy (SCPP). SCPP must 1) set out minimum requirements for selection of all sub-contractor based on the questionnaires and assessment of the past HSE records and compliance 2) Define strict environmental and EHS terms for supplier/contractor into the EPC tender addressing forced labor, child labor, health and safety standards, E&S standards	Minimize E&S impacts in the supply chain.	EBRD PR1, (para 23) EBRD PR2	NEGU PIT (supported by third party consultant)	Pre-EPC Contract Signature (EPC contract Effective Date)	1. Documented SCPP 2. Evidence of SCPP appended to EPC Contract (construction) 3. SCPP appended to any O&M supply contracts (operation)

No.	Action required	Environmental and social risks (liability/benefits)	Requirements (legislative, EBRD PR, best practice)	Resources, investment needs, responsibility	Timeframe	Target and evaluation criteria for successful implementation
	and labor management policies. 3) require all contractors and suppliers to be screened prior to their involvement in the project (including H&S and E&S risks). 4) Select contractors that demonstrate adequate capability in EHS and labor management including managing subcontractors. 5) Require periodic EHS compliance audits or inspections to ensure compliance of the suppliers/contractors with applicable national legislation and the EBRD's					
1.12		Minimize E&S impacts in the supply chain.	ESIA, ESMP EBRD PR1 EBRD PR2	Main Contractor (own resources, external consultants)	1.Pre-mobilization 2. During the project lifetime but checks to be made prior to signing each subcontractor's agreement	Supply Chain Management Procedure Due diligence and screening pre- qualification report (per contractor/supplier) Evidence of back-to- back E&S commitments

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	the prohibition of forced and child labor in their supply chain and demonstrate health and safety standards that align with GIP and robust labor management policies as part of the bidder selection process.					in agreements with suppliers/sub-contractors to ensure alignment with applicable project standards.
1.13	Develop Decommissioning ESMP (including OHS plan and other relevant topic-specific plans)	Impact on environment and community during decommissioning	EBRD PR1	Decommissioning Contractor / NEGU	120 days pre- decommissioning	Decommissioning ESMP Decommissioning OHS Decommissioning sub- plans
1.14	Provide evidence that the following have been included in the EPC Design Specification: • Full tension stringing • 200m between receptors and OHTL center line • Bird Flight Diverters on overhead, or static lines of the OHTL following GIP, within highrisk portions of the lines 1	Reduce E&S impacts through design	EBRD PR1 EBRD PR 6	NEGU PIT	Pre-EPC Contract Signature (EPC contract Effective Date)	EPC Contract /Design drawings

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¹ All of Lot 2 (40.687271° 64.625539° to 40.620080° 64.705109°), westernmost 5 km of Lot 1 (41.097761° 61.969967° to 41.098389° 62.029836°), eastern 33% of Lot 1 (41.008969° 62.943141° to 40.870647° 63.386358°)

No.	Action required	Environmental and social risks (liability/benefits)	Requirements (legislative, EBRD PR, best practice)	Resources, investment needs, responsibility	Timeframe	Target and evaluation criteria for successful implementation
	 Raptors safe towers2 Micro siting of pylons and access road to avoid takyrs to the extent possible within the potential habitat of SEFG, Tulipa lehmanniana (Lot 2) and Acanthophyllum cyrtostegium (Lot 1) to the extent possible No access track along the entire ROW. Use existing road where possible to access the tower Work fronts 					
1.15	Provide evidence that the following have been included in Master Schedule: • Groundworks performed outside wet season. • Restriction of construction activity to outside of April and May, for Goitered Gazelle (GG) & Macqueen's Bustard (as per ESIA)	Reduce E&S impacts through design	EBRD PR1 EBRD PR6	NEGU / Main Contractor	Pre-EPC Contract Signature (EPC contract Effective Date)	EPC Contract - Schedule
1.16	The Project is required to undertake Quarterly Construction Monitoring audits of construction activities by Environmental, Health and Safety, Social, and Labor (EHSS) specialists.	Prevention of damage to environment, accidents prevention, ensuring adequate labor	Good Practice EBRD: PRs Regulations Environmental Regulations Environmental Consent	Cost of Independent Environmental & Social Consultant,	During Construction	Audit reports to be provided to Lenders. (In addition to regular monthly monitoring reports).

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² Electrified cables suspended below, rather than above support structures, ≥2m of insulators at each attachment point of a powerline to a support structure, ≥2m separation between electrified cables, Jumper cables suspended below insulators/support structures

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		working conditions, cooperation with administration. Supervision of implementation of environmental consent decisions for construction works				
1.17	The project shall be subject to independent annual Operational Monitoring audit by Environmental, Health and Safety, Social, and Labor (EHSS) specialists.	Confirm the implementation biodiversity mitigation	GIP EBRD: PRs National laws	Cost of Independent Environmental & Social Consultant,	First year post COD	Audit reports to be provided to Lenders.
2.1	Establish Human Resource (HR) Policy that aligns with NEGU Project Labor Agreement e.g.,2.2 below). Working conditions Terms of employment Informing workers about their rights Child Labor Forced labor Equal op opportunities/nondiscrimina tion Workers organizations	Ensure adequate management of workforce in line with EBRD requirements and law of the Republic of Uzbekistan (including labor conditions, social security, minimum wage, working hours, no child/forced labor	EBRD PR2 Labor code of Uzbekistan	Main Contractor (supported by specialist) (own budget and resources)	42 days before Site mobilization	HR Policy Labor Management Plan Worker grievance mechanism

No.	Action required	Environmental and social risks (liability/benefits)	Requirements (legislative, EBRD PR, best practice)	Resources, investment needs, responsibility	Timeframe	Target and evaluation criteria for successful implementation
	 Worker's 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. 	etc.).				
2.2	Develop Project Labor Code of Conduct for signature by all employees working on the Project and all Contractor and sub- contractors. To be appended to the EPC Contract.	management of	EBRD PR2 Labor code of Uzbekistan	NEGU PIT (supported by third party specialist)	Prior to EPC Contract signature for the duration of the Project.	Project Labor Code of Conduct aligned to EBRD PR2 and national law appended to EPC Contract
2.3	Develop Local Employment and Procurement Plan including Equal Opportunities Action Plan to promote good practices with respect to gender and equal opportunities in the Contractors workforce and include checks for child labor, forced labor, OHS and biodiversity risks in the supply chain.	Maximize local employment opportunities and gender balance in the work force.	EBRD PR2 ILO Best Practices Labor Law Compliance with national legislation	Main Contractor	42 days before Site mobilization	Construction Labor statistics dis-aggregated by Gender and skill level. Local Employment and Procurement Procedure

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2.4	Establish and disclose Worker Grievance Mechanism (WGM) for permanent and subcontracted employees.	Improved employee/ subcontractor relationship and management	EBRD PR2 GIP	Main Contractor	Prior to any site works and continued for the lifetime of the project	Documented WGM Evidence of disclosure WGM Log including raised grievances and resolutions.
2.5	Perform labor monitoring on all contractors and sub-contractors following protocol defined in Contractor LMP (as approved by the Lenders).	Ensure the cascading of PR2 requirements through the contracting chain.	EBRD PR2 Uzbek Labor Law	Main Contractor (or specialist labor auditor)	via annual reporting	Labor audit report submitted twice per year and approved by Lenders
2.6	Develop a Project Security Management Plan (SMP) ³ Conduct reference checks on all security personnel and confirm required training.	Reduced security risks / keep the facilities in secure	EBRD PR2 EBRD PR 4	Main Contractor	42 days before Site mobilization Prior to appointment of security personnel	Security Management Plan Training records. Copies of reference checks.
2.7	Prepare a Worker and Security Guard Code of Conduct and require workers (and security	Protection of workforce and local community	ESIA, ESMP EBRD PR2	Main Contractor (supported by specialist) (own	42 days before Site mobilization COC signed within	Worker and Security Guard Code of Conduct

³ As relevant the SMP to include requirements for relevant training to security personnel on conflict resolution, crowd management, restraint and cautious exercise of the security activity, proportional use of force (if allowed) and basics of human rights, reference checks to ensure that candidates do not have any criminal record or record of abuse or violation of human rights.

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	personnel) to sign it during their site induction (including GBVH expectations).	members		budget and resources)	2 weeks of appointment of each contractor and subcontractor on site.	Signed Code of Conduct (for each worker)
2.8	Prepare an Accommodation Management Plan (AMP) as per IFC/EBRD guidance on worker accommodation 2009. Audit accommodation	Provide adequate accommodation for workers in line with GIP welfare standards.	ESIA, ESMP EBRD PR2 EBRD and IFC 'Workers' Accommodation: Processes and Standards'	Main Contractor (support by specialist) (own budget and resources)	42 days before Site mobilization Within 1 month from mobilization	AMP submitted for Lender's clearance Accommodation monitoring report twice per year.
2.9	Develop and implement a sexual harassment policy to prevent and address any form of violence or harassment, including any form of gender-based violence or harassment (GBVH). Training on this policy will be provided to all employees and contractors. Human resources personnel will also be trained on how to respond to incidents of GBVH	Protection of workers and project stakeholders from GBVH risks; and clearly aligning the project's GBVH policy with EBRD Requirements.	Good Practice EBRD: PR 1 / 2 / 4	Internal Costs.	Prior to Financial Close.	GBVH Policy which all employees have access to.
3.1	Resource Efficiency and Pollution Properties Develop a Waste Management		ESIA, ESMP	Main Contractor	42 days prior to site	Documented WMP
3.1	Plan (WMP) for construction phase. WMP must require Temporary Waste Storage Areas in accordance with the technical specifications set by the Ministry	are managed in accordance with	National law EBRD PR3 Basel Convention	(own budget and resources)	mobilization Temporary waste storage areas to be established prior to	Appropriate waste storage areas in line with the regulations and this ESAP.

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	and/or Municipality and requirements to obtain permit for the Temporary Waste Storage Areas where necessary and relevant requirements under national laws for transportation and disposal of waste ⁴ .	hazardous waste disposal)			waste being generated on-site	Waste audit records
3.2	As part of the Operational ESMP, define waste management strategy for Project O&M waste streams. Waste audit to confirm operational waste management aligned with GIP.	Ensure wastes are managed in accordance with ESIA requirements and GIP (for hazardous waste disposal)	National law GIP	NEGU PIT in coordination with NEGU Regional Department (own resources / external consultant)	Pre-COD. One year post COD	Waste statistics Waste audit report.
3.3	Develop hazardous material management plan (HMMP) - Develop an inventory of materials and chemicals construction works. Ensure that all Material Safety Data Sheet (MSDS) form available in local language in accordance with the relevant regulation. - Ensure implementation of ESIA	Hazardous material control Compliance with national regulations	EBRD PR3 EBRD PR4	Main Contractor (own budget and resources)	42 days before Site mobilization	Documented HMMP Developed chemical inventory. Evidence of MSDS located where chemicals are handled and stored. Records of visual checks

⁴ Temporary Waste Storage Areas should be appropriately fenced, have a concrete floor and roof for protection from rainfall, have separate areas for each type of waste and include necessary collection pits/secondary containment.

No.	Action required	Environmental and social risks (liability/benefits)	Requirements (legislative, EBRD PR, best practice)	Resources, investment needs, responsibility	Timeframe	Target and evaluation criteria for successful implementation
	mitigation measures to prevent pollution, including the storage requirements for hazardous materials.					and internal audits in storage areas. Appropriate secondary containment and spill kits for chemical and oil drums storage/handling areas.
3.4	Confirm EPC contract clause has prohibited use of hazardous substances highlighted in international obligations (asbestos, PCB containing materials, leadbased paints, certain pesticides and herbicides)"	Ensure hazardous material obligations are mandated for the Project	National law, ESIA, ESMP, EBRD PR3, relevant international Conventions	NEGU PIT	Pre-NTP	Relevant EPC Contract clauses
4	Health, Safety and Security					
4.1	Establish a comprehensive Construction Health and Safety Management System (HSMS) occupational health and safety aligned with ISO45001 including Key Performance Indicator (KPI) system and ensure that it covers all subcontractors. Develop an accident investigation/analysis program and investigate lost time injuries in detail to prevent recurrence of such accidents. Key employees are recommended to attend root cause	Increased health and safety performance during construction of the OHLT and substation works. Minimize OHS accidents and incidents.	ESIA, ESMP National Occupational Health and Safety Law EBRD PR4 GIP	Main Contractor (own budget and resources)	42 days before Site mobilization	HSMS including OHS Policy is signed by leadership. KPI system including subcontractor management. Accident investigation/analysis reports. Near-miss records.
	analysis training.					Documented EHS

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	Develop a near-miss reporting system to inform unsafe acts and conditions through near miss cards and need to raise awareness program. Develop EHS training matrix with EHS competencies needed for a type of job position.					training matrix. Records of EHS training.
4.2	Develop Occupational Health and Safety management Plan (OHSMP) separately for Lot 1, Lot 2 OHTL and each end-user works covering commission of live equipment.	Minimize H&S accidents and incidents	EBRD PR1 EBRD PR4 GIP for H&S. Occupational Health and Safety Law	Main Contractor (own budget and resources)	42 pre-mobilization	OHSMP (Lot 1, Lot 2, Substation works)
4.3	Confirm maintenance control program for mechanical equipment (such ladders, lifting vehicles, telescopic platforms and 4x4 vehicles) is in place and correct where not.	Equipment Design and Safety	EBRD PR4	NEGU PIT (supported by third party) (own resources / external consultant)	Pre-COD	Maintenance Control procedures (for relevant topics)
4.4	Prepare a Transportation Management Plan (TMP) (including road safety policy, practices and procedures, driver code of conduct, monitoring and training requirements including a defensive, off road and antiskid driving training program for own drivers and sub-contractors' drivers)	Reduce risks to community members and workers related to transportation of components and workers to construction campand Workfront's	ESIA, ESMP EBRD PR4	Main Contractor (own resources and budget)	42 days before Site mobilization	TMP reviewed and accepted by Lenders

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4.5	Prepare emergency preparedness and response plan (EPRP). To include specific information on dust storms and evacuation of injured personnel, drills and training requirements.	Protection of workforce and communities in the case of an emergency	ESIA EBRD PR4	Main Contractor (own resources and budget)	42 days before Site mobilization	EPRP reviewed and accepted by Lenders
4.6	Confirm the EPR provision in place for the operation phase as applicable to the Project and outline any supplementary recommendations e.g., relating to extreme heat, dust storms etc.	Protection of workforce and communities in the case of an emergency during operation phase specific to the environment of the Project	ESIA, ESMP EBRD PR4	NEGU PIT (own resources and budget)	Pre-COD	EPR review report (operations) and action plan
5.1	Land Acquisition, Involuntary Res If land acquisition and/or livelihoods impacts are confirmed, the company to prepare, disclose, and implement a Resettlement Plan (RP) for the OHTL following the requirements of Land acquisition and Livelihood Restoration Framework (LARF) and ESP PR5.	Ettlement and Econo Land users and owners	ESIA, LARF National Land Law EBRD PR5	NEGU PIT (supported by specialist third party) (own resources, external consultants)	Post approval	RP reviewed and accepted by lenders Progress with RP implementation reported via annual reporting
5.2	Certify the implementation of RP through Completion Report that should be approved by Lenders.	Land users and owners	ESIA/LARF national Law EBRD PR5 GIP	NEGU PIT (supported by specialist third party) in coordination with	Prior to start of works on sections with PR5 impacts	Completion report approved by Lenders Completion report submitted via annual

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			practice)	District Khokimyat		reporting
6	Biodiversity Conservation and Sus	stainable Manageme	ent of Living Natur	al Resources		
6.1	Prepare site clearance and rehabilitation plan (SCRP) including soil management, sedimentation control and soil restoration requirements	Minimize risk of soil degradation and compaction leading to erosion	ESIA, ESMP GIP	Main Contractor	42 days before Site mobilization	SCRP (reviewed and accepted by the Lender)
6.2	Develop and implement Biodiversity Management and Monitoring Plan (BMMP) including Flora and Fauna Survey, Rescue and Relocation Protocol.	Protect PBF's and other habitat during construction works	ESIA, ESMP PR6	Main Contractor	42 days before Site mobilization	BMMP F&F Rescue and Relocation Protocol
6.3	Perform Spring and summer ecological surveys in areas of direct impact to confirm no critical habitat	Impact on critical habitat, key biodiversity features	National Law, EBRD PR6, EU Habitats Directive	ESIA Consultant on behalf of NEGU (ongoing)	Pre-financing	updated ESIA including supporting ecological survey reports
6.4	Confirm critical habitat status of PBF following spring and summer 2022 survey work.	Protection of flora and fauna	National Law, EBRD PR6, EU Habitats Directive	ESIA Consultant on behalf of NEGU	Pre-financing	Critical habitat assessment
6.5	Perform pre-construction biodiversity survey for Acanthophyllum cyrtostegium, Tulipa lehmanniana and undertake plant relocation / replanting	Impact on critical habitat, key biodiversity features	National Law, EBRD PR6, EU Habitats Directive	Main Contractor	42 days before Site mobilization	Construction phase plant /fauna rescue/relocation report
6.6	Perform pre-construction monitoring and relocation for reptiles (including SEFG) including	Impact on critical habitat, key biodiversity	ESIA, ESMP, BMMP National Law,	Main Contractor (specialist third party support)	42 days before Site mobilization	Construction phase plant /fauna rescue/relocation report

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	requirement to survey SEFG population immediately before construction and relocating to the nearest habitats Creation of closed zones, at least temporary, for the period of construction where transport, livestock and people should not get into that can be used for the release of the geckos after relocation and if found during the excavation works Long-term monitoring of the population after construction	features	EBRD PR6, EU Habitats Directive			
6.7	Prepare Southern Even Fingered Gecko (SEFG) Biodiversity Action Plan (BAP) – to include protocol for off-site SEFG habitat rehabilitation for "net gain" (Lot 1 OHTL only) and implement.	Protection of flora and fauna	ESIA, ESMP EBRD PR6,	NEGU (third party specialist consultant) (budget for preparation of the BAP and costs for implementation of the requirements)	Pre-financing	Biodiversity Action Plan (BAP) (as required)
6.8	Install temporary fencing around takyr within 50m of works to exclude people, heavy machinery,	Impact on critical habitat, key biodiversity	National Law, EBRD PR6, EU Habitats	Main Contractor	42 days before Site mobilization	Workfront method statement signed off by Bio monitor for each

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	equipment laydown, or any vehicles for (22 km segment in the eastern portion of Lot 1 only)	features – in particular protection of SEFG in close proximity to the direct construction area	Directive			relevant Workfront in stated section)
6.9	Employ a biodiversity monitor to be present on-site during excavation works to assure compliance with construction phase mitigation measures, and to conduct daily searches of Work fronts and animal rescue from open trenches	Impact on critical habitat, key biodiversity features during foundation works.	ESIA, ESMP EBRD PR6	Main Contractor (budget for duration of foundation works)	42 days before Site mobilization	Signed Contract and CV
6.10	Implement Five-year aftercare and monitoring program covering all temporary disturbed areas	To ensure soil and associated vegetation cover is returned to its original state	ESIA, ESMP EBRD PR1	Main Contractor NEGU	Prior to COD Annually from COD	Rehabilitation status report Annual rehabilitation status report
7	Cultural Heritage			1	1	
7.1	Perform cultural heritage surveys for Lot 1 OHTL	Protection of unknown cultural heritage	EBRD PR1, 8 National Centre for Archaeology	Main Contractor supported by cultural heritage specialist (budget allocation in EPC Contract) Overseen by PIT	42 days before Site mobilization	Archaeological Survey Procedure and report.
7.2	Maintain 150 m buffer between known archaeological artefacts (OHTL)	Protection of known cultural heritage	ESIA, ESMP EBRD PR1, 8 National Centre	Main Contractor Overseen by PIT	42 days before Site mobilization	OHTL detailed design - determination of buffers and no-go zones

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7.3	Develop and implement chance finds procedure and watching brief - to include requirement to notify Competent Authority (Cultural heritage) (OHTL)	Protection of unknown cultural heritage	for Archaeology ESIA, ESMP National legislation EBRD PR1, 8	Main Contractor supported by cultural heritage specialist (budget allocation in EPC Contract) Overseen by PIT	42 days before Site mobilization or any site clearance works (whichever is earlier) for duration of foundation works	Documented 'Chance Finds Procedure' Watching brief during works. Training of Project employees in chance finds procedure (e.g., induction records)
8	Information Disclosure and Stakeh	older Engagement	I			,
8.1	Implement the Stakeholder Engagement Plan (SEP) and ensure SEP is updated regularly but no later than twice a year. Assign Community Liaison Officer to manage the delivery of SEP	Loose social license to operate Maintain effective relationships with stakeholders (including land users)	EBRD PR10 EBRD PR5	PIT supported by Main Contractor (Costs associated with printing of any notification material leaflets, posters and performing SEP updates)	Consultation throughout construction and operation Consultation on local hiring policy – pre-mobilization.	Reporting on stakeholder engagement activities Annual review and update to SEP Stakeholder communication log Regular consultation CLO assigned for client and Contractor
8.2	Implement Community Grievance	Maintain effective	EBRD PR10	PIT (construction)	Pre-site mobilization	Document Community
J.2	Mechanism (including land users) ⁵ .	relationships with	LDNDTNIO	Regional	(to be implemented	Grievance

⁵ This should include clear means of registering complaints, an action process to resolve them, and recording of complaints and their resolution and mechanism to oversee contractor management of grievances as outlined in the SEP to ensure conformance

No.	Action required	Environmental and social risks (liability/benefits)	Requirements (legislative, EBRD PR, best practice)	Resources, investment needs, responsibility	Timeframe	Target and evaluation criteria for successful implementation
		stakeholders (including land users)		Department NEGU (operation)	for the duration of the project lifetime).	Record of notification of contact information to all PAP (including those affected by livelihood restoration) Mechanism Grievance Log Records of Engagement
8.3	Hold community awareness meeting to notify PAP of potential risks and associated actions identified in the ESIA (with particular attention to notifications regarding cultural and agricultural practices and engagement with vulnerable groups) and provide relevant community awareness training.		ESIA, ESMP, SEP, EBRD PR10	NEGU PIT (Costs associated with printing of any notification material (Leaflets, posters)	42 days before Site mobilization	Evidence of community notifications (in SEP) and ongoing through construction and operation phase as necessary.