

Tsetsii Wind Farm Environmental and Social Action Plan

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	Demonstrate compliance with national legislation with regards to OHL leases requirements and DEIA permitting requirements.	Non-compliance with national legislation	EBRD PR1 National legislation	CEA resources	Prior to financial close	Provide evidence of permits and land lease agreements for the transmission line. Provide permit approval (GEIA or DEIA) for the transmission line in accordance with national requirements	Completed
2	Engage project EHS manager and review EPC contractor ESMS Engage project CLO	Capacity and capability, non-compliance with regards to implementation and management of environmental risks	EBRD PR1	CEA resources	At least three months prior to start of construction activities	Roles filled, CV provided to Lenders for review ESMS qualifications of EPC	Open
3	Identification of potential sensitive receptors along the route.	Disputes, negative publicity, risks to social license to operate.	EBRD PR1	CEA resources External consultants Responsibility: CEA EHS Manager	Prior to financial close	Transmission line route survey and mapping of permanent and temporary (including evidence of previous occupation) residents.	Completed
4	Update ESMP to include clear list of all sub plans referred to in ESIA as well as outline of issues to be addressed within each sub plan. Identification of responsibilities for development of sub plans and implementation responsibilities. Identification of construction vs operational sub plan Clear templates for regular monitoring	Optimisation of environmental and social management through formalised system. Labour unrest. Community unrest. Company reputational damage.	EBRD PR1	CEA resources External consultants Responsibility: CEA environmental manager	Prior to financial close	Updated ESMP	Completed

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	and reporting of EHS performance and KPIs is required						
5	<p>Construction Environmental & Social Management Plans, including but not limited to:</p> <ul style="list-style-type: none"> • Community health and safety management plan • Hazardous Materials Safety • Traffic and Road Safety • Exposure to Disease • Emergency Preparedness and Response • Biodiversity Management Plan • Archaeological/Cultural Heritage Chance Finds Procedure • Dust management plan • Waste water management plan • etc 	<p>Optimisation of environmental and social management through formalised system.</p> <p>Labour unrest.</p> <p>Community unrest.</p> <p>Company reputational damage.</p>	EBRD PR1	<p>CEA resources</p> <p>External consultants</p>	Prior to start of construction	Completed Construction ESMP provided to Lenders and EBRD for review	Open
6	<p>Operations Environmental & Social Management Plans, including but not limited to:</p> <ul style="list-style-type: none"> • Community health and safety management plan • Hazardous Materials Safety • Exposure to Disease • Emergency Preparedness and Response • Biodiversity Management Plan • Grievance Mechanism 	<p>Optimisation of environmental and social management through formalised system.</p> <p>Labour unrest.</p> <p>Community unrest.</p> <p>Company reputational damage.</p>	EBRD PR1	<p>CEA resources</p> <p>External consultants</p>	Prior to start of operations	Completed Operations ESMP provided to Lenders and EBRD for review	Open

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	<ul style="list-style-type: none"> etc 						
7	EHS reporting to external parties	Transparency and demonstration of compliance with EBRD standards	EBRD PR1	CEA resources	Every three months during construction phase and annually (or every six subject to EBRD review) during the operational phase.	Regular reports completed submitted to EBRD for review	
PR2 Labour Working Conditions							
8	<p>HR policy to be developed in compliance with PR2. The HR policy must include:</p> <p>Prohibition of use of child and forced labour.</p> <p>Prohibition of discrimination</p> <p>Freedom of workers to form or join workers' organisations.</p> <p>Requirements related to minimum wages, benefits, conditions of work and benefits.</p> <p>Provisions for retrenchment</p> <p>A worker's grievance mechanism</p> <p>Workers accommodation management plan</p> <p>A commitment to cover non-employee workers</p> <p>Focus can be placed on enhancing women's opportunities to benefit from the Project.</p> <p>This commitment to apply the EPC contractor and subcontractors in workforce language (Chinese)</p>	<p>Labour unrest</p> <p>Child and forced labour, company reputational damage</p>	<p>EBRD PR2</p> <p>Best practice</p> <p>Mongolian labour legislation</p>	<p>CEA resources: human resource manager</p> <p>Responsibility: CEA HR manager</p>	Prior to start of construction	<p>Develop and implement an HR policy (this may be drawn from other existing CEA Wind Farm projects)</p> <p>Translate HR policy in workforce language (Chinese)</p> <p>Demonstrated opportunities for local community and women to benefit from the Project.</p> <p>Commitment within EPC contract to meet EBRD PR2 standards and adhere to and develop the plans identified</p> <p>Monitoring reports of working conditions and accommodation.</p>	Open

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9	Contract requirements to formally commit EPC contractor and subcontractors to ensure prohibition of child and forced labour.	Labour unrest, company reputational damage	EBRD PR2 Best practice Mongolian labour legislation	CEA resources Responsibility: CEA human resource manager	Prior to construction	Contract conditions that include prohibition of child and forced labour	Open
10	Training for security guards in use of force and vetting for past offences Develop appropriate due diligence questionnaire for site security for review.	Community unrest, reputational damage, community health and safety risks	EBRD PR2 Best practice	CEA resources EPC contractor Responsibility: CEA human resource manager, EPC contractor	Prior to start of construction	Training undertaken and security guards vetted Completed due diligence questionnaire regarding site security	Open
PR3 Resource Efficiency and Pollution prevention control							
11	Develop construction water resource use assessment and management plan, addressing ability and capacity of existing local supply to provide construction requirements without impacting existing users	Conflicts with communities over water resources	EBRD PR3, best practice	CEA resources External consultants	Prior to start of construction	Evidence of water resource agreements with the soum and/or local mine for provision of project water needs and report demonstrating capacity of local supply.	Open
12	Develop operational water resource use assessment for the development of onsite well for control room (25 permanent employees, including accommodation). Subject to results identify water management plan for operational phase.	Conflicts with seasonal nomadic herders who rely on shallow aquifers within the wider project area	EBRD PR3, best practice	CEA resources External consultants	Prior to financial close	Report on assessment of capacity and quality of local aquifer to supply operational requirements without impacts on existing water resource users.	Open
PR4 Health and Safety							
13	Develop occupational health and safety plan. Including consideration of measures to protect operational works from experience night time noise levels above 45dBA during operational phase within the control building accommodation	Labour unrest and grievances	EBRD PR4 International OHS standards	CEA resources External consultants Responsibility: CEA environmental manager, EPC contractor	Prior to start of construction	Completed occupational health and safety plan. Design specification for control room to limit noise levels. Commitment in EPC contract	Open

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PR5 Land Acquisition, Involuntary Resettlement and Economic Displacement							
15	Prepare LAF document detailing the livelihood baseline, project impact, and compensation approach.	Disputes around compensation	EBRD PR5	CEA resources External consultants Responsibility: CEA environmental manager	Prior to financial close.	LAF document	Open
16	Disclose the ESIA and the impacts associated with the potential loss of grazing land.	Disputes around land acquisition	EBRD PR5	CEA resources External consultants Responsibility: CEA environmental manager	Prior to financial close.	Updated ESIA or addendum ESIA	Complete
17	Incorporate resettlement specific grievances into the community grievance mechanism	Disputes around compensation	EBRD PR5	CEA resources External consultants Responsibility: CEA environmental manager	Prior to start of Construction	Community grievance register	Complete
18	Regular consultation with herders regarding potential impacts to their livelihoods. Regular monitoring of potential impacts to the livelihoods of herders.	Economic hardship, loss of company reputation	EBRD PR5	CEA resources Responsibility: CEA CLO	Prior to start of construction During operation	Minutes of meetings Reports on monitoring of livelihood impacts	Ongoing
PR6 Biodiversity Conservation							
20	Installation of bird diverters on transmission line wires	Reduction of risk of collision with overhead lines from birds including saker falcon, cinereous vulture and upland buzzard	EBRD PR6 Best practice	CEA resources External consultants Responsibility: CEA environmental manager, EPC contractor	Requires early sourcing and procurement to avoid delays to construction programme	Plan for installation of bird diverters following international best practice Post construction monitoring of transmission line for bird carcasses as the result of collision	Open

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					Installation during construction of transmission line	Evaluation of monitoring to determine effectiveness of mitigation. Demonstration of no net loss/net gain.	
21	Installation of nesting platforms for birds on transmission line pylons	Increase nesting opportunities for birds including saker falcon	EBRD PR6 Best practice	CEA resources External consultants Responsibility: CEA environmental manager, EPC contractor	Installation during construction of transmission line	Provision of plan for installation of nesting platforms Post construction monitoring of uptake of sites by nesting birds Evaluation of monitoring to determine effectiveness of mitigation. Demonstration of no net loss/net gain.	Open
22	Installation of artificial nesting platforms for birds in Tsetsii Mountain SPA	To mitigate the potential loss of birds through collision from the WTGs, including saker falcon, cinereous vulture and upland buzzard, through increasing nesting opportunities and local population gains	EBRD PR6 Best practice	CEA resources External consultants Responsibility: CEA environmental manager, EPC contractor	Prior to start of operation	Demonstrate plan for installation of nesting platforms Post construction monitoring of the uptake of sites by nesting birds Operational monitoring of WTGs for bird carcasses as the result of collision Evaluation of monitoring to determine effectiveness of mitigation. Demonstration of no net loss/net gain.	Open
PR10 Information Disclosure and Stakeholder Engagement							
23	Disclose the ESIA and transmission line addendum for public consultation.	Company reputational damage Loss of trust with community and unrest	EBRD PR10	CEA resources External consultants Responsibility: CEA environmental manager, CLO (if appointed in time)	Prior to financial close	Disclosed ESIA as per SEP	Complete

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24	Implement and update the SEP during construction and operations.	Company reputational damage Loss of trust with community and unrest	EBRD PR10	CEA resources External consultants Responsibility: CEA CLO	Prior to start of construction and operation	Implemented and updated SEP	Ongoing