

SALKHIT WIND FARM OPERATIONS ENVIRONMENTAL AND SOCIAL ACTION PLAN 2022

Nº	Action	Evaluation	Implementati on period	Requirement	Status	
PERF	DRMANCE STANDARD 1: ENVIRONMENTAL AND SOC					
1.1	REPORT to the Bank on environmental, social, health and safety performance, including status of each Environmental and Social Action Plan (ESAP) element and other agreed activity.	Submission of report on specified schedule.	During operation	EBRD requirement	This report forms part of the reporting commitment to the Bank.	Annual Environmental & Social Report 2021 provided in April to the EBRD and FMO.
1.2	DEVELOP AND IMPLEMENT a Project Stakeholder Engagement Plan (SEP) in line with EBRD performance requirement.	Information in annual report of any new developments in the region	During operation	EBRD requirement	The Public Consultation and Disclosure Plan (PCDP) describe the key stakeholders, information and communication plans, a time schedule for future consultation and grievance procedures. The document provides all information to satisfy EBRD performance requirement.	Updated and published on website. http://www.cleanenergy.mn/uploads/files /PCDP%20-%20Aug%202019%20- %20ENG.pdf
1.3	MONITORING PLAN: Implement the Environmental monitoring plan as provided in the Environmental and Social Impact Assessment (ESIA) to track progress against <i>Key Performance Indicators</i> (KPI) and EBRD PRs.	Environmental Monitoring Plan Annual EHS Report to the Bank	During operation	EBRD requirement and best practice	Undertake annual audit checklist.	Actions covered in annual Environmental monitoring.
1.4	CONTRACTORS: Manage all on-site contractors' Environmental and OHS performance for their actions.	Review of OHS and environmental manager capacity	During operation	Best practice	All on-site contractors must have qualified HSE managers, or they must strictly follow Clean Energy's HSE managers' requirements.	Continually ongoing.
1.5	WASTE MANAGEMENT: Develop and implement a comprehensive waste management plan/procedure to guide management of all wastes to be generated during operation.	Reporting of waste disposal/recycling records. Records of unauthorized discharge of waste effluent	During operation	ISO 14001 requirement and best practice	Collect all waste transfer records and notes on site. Color coding system to be developed and implemented on site Organize periodic clean-ups of existing garbage to improve the landscape, particularly in and around the birch scrub	Continually ongoing.
PERF	DRMANCE STANDARD 2: LABOUR AND WORKING CO	NDITIONS				
2.1	PROCEDURES: Develop and implement occupational health and safety procedures relevant to wind park operation	Procedures approved	During operation	Mongolian occupational health and safety relevant standards	Develop and implement all relevant HSE procedures All procedures must be communicated and signed off by all staff on site	Updated and provided to the Lender's Engineer.
2.2	TRAININGS: Develop and implement OHS training program to improve OHS documents disclosure and compliance. It must encompass, but not limited to: Information on EMP and all associated procedures to all employees and subcontractors	Conduct the trainings	During operation		Identify OHS training needs for workers. Undertake the trainings (HSE orientation and induction, risk assessment and job safety analysis training, job specific HSE training including daily toolbox talks and specialized training such as first aid, material safety data sheet).	Trainings conducted on schedule such as technical and firefighting practical training.



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PERF	I ORMANCE STANDARD 3: POLLUTION PREVENTION A					
3.1	SPILL: Prepare and implement a Spillage	Cleanup kits are provided.				
3.1	management plan (fuel, etc.), including (but not limited to): - Cleanup kits (absorbent materials, etc.) carried in all vehicles and equipment at all times. - Training for drivers and equipment operators, and others who use fuel, oil and other hazardous materials. - Inspect all vehicles and equipment for leaks before use near or in water.	 Monitoring Training Report to Bank Secondary containment in place Drip trays and spill kits for vehicles Spill kits located around the site and vehicles 	During operation	ISO 14001 requirement and best practice	Provide cleanup kits for all vehicles Deliver training for all drivers and staff Inspect vehicles before use	Training is covered in daily toolbox talk.
3.2	WASTE: Contain all sanitary wastes from site and provide appropriate treatment prior to permitted discharge.	Records of waste treatment and disposal.	During operation	ISO 14001 requirement and best practice	Collect sanitary wastes in appropriate tanks Contract permitted subcontractor Collect waste transfer notes on site	All wastes transported by a local contractor once in two weeks to be disposed to Nalaikh waste disposal site (a small subdivision of Ulaanbaatar)
PERF	ORMANCE STANDARD 4: COMMUNITY HEALTH, SAFE	TY AND SECURITY				
4.1	FIRE SAFETY: Develop a Life & Fire Safety (L&FS) master plan to ensure that the facility design and construction to comply with an international fire code. Conduct L&FS audit against an international fire code.	Reporting of audit findings.	During operation	Mongolian occupational health and safety relevant standards, ISO 45001 and best practice	Conduct monthly fire inspections and mark the tags Organize fire drills and report	Training report will be provided to Lender's Engineer.
4.2	TRAINING: Provide training to work leaders and others for minimizing noise, dust, and other activities that would disturb nearby residents, especially in evening and night. Perform operational nonemergency work during daylight hours at location near residences or other gathering places.	Report to Lender's engineer on training and on complaints and responses.	During operation	ISO 9001 and best practice	Toolbox talks to cover these topics	Daily toolbox talk is continually ongoing.
PERF	ORMANCE STANDARD 5: BIODIVERSITY CONSERVATI	ON AND SUSTAINABLE NATU	RAL RESOURCE M	ANAGEMENT		
5.2	ENVIRONMENTAL MONITORING: 1. Research of water environment 2. Research of atmosphere • Noise measurement • Research of environmental pollution • Research of air pollution of site vehicle smoke 3. Research of plant coverage • Research of flora 4. Research of soil environment • Erosion and pollution of soil cover	Reporting of environmental monitoring outcomes Identification of suitable mitigation plan	During operation	Mongolian environmental relevant standards, Detailed Environmental Impact Assessment, ISO 14001 and best practice	Conduct annual environmental monitoring Develop and follow up the mitigation plan	Annual environmental monitoring conducted in August and the report provided to Lender's Engineer.
5.2	BIRD & BAT: Undertake operational bird and bats monitoring. Review of monitoring results to determine suitable mitigation measures.	Reporting of monitoring outcomes and proposed mitigation	During operation	EBRD requirement	Conduct bird and bat monitoring during operational phase	Monitoring is ongoing as schedule. End of year (2021) report will be provided to Lender's Engineer within Feb 2022.



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5.3	BIRD & BAT: Training of operational personnel to undertake bird collision monitoring during operation of the wind farm.	Training Records.	During operation	EBRD requirement	Train operational staff in bird collision monitoring	Instructions provided to operational personnel in toolbox talk.
5.4	BIRD & BAT: Monitor bird and bat mortality in wind park and along transmission line corridor. In case of excessive mortality, develop and implement a bird monitoring and mitigation plan.	Reporting of bird and bat collision monitoring outcomes Identification of suitable mitigation plan	During operation	EBRD requirement	Monitor the bird mortality along the transmission line Develop Bird mitigation plan Develop Biodiversity action plan	Monitoring is ongoing as schedule. End of year (2021) report will be provided to Lender's Engineer within Feb 2022.
5.5	Biodiversity Action Plan: Develop powerline insulation offset implementation plan	Target power lines and numbers of poles identified, agreements with regional power companies in place, proven retrofitting design ready to install	2021	BAP 6.3 Phased offset implementatio n	Develop implementation plan To tender for and engage contractors Undertake pre- retrofitting surveys to quantify/demonstrate effectiveness Engage with regional electricity providers to negotiate retrofitting opportunities	Pre-retrofitting survey is completed. Due to Covid-19 pandemic retrofitting actions postponed until 2022.
ОТНЕ	RS: INFORMATION DISCLOSURE AND STAKEHOLDER					
6.1	PLAN: Update Public Consultation and Disclosure Plan (PCDP) and Grievance Mechanism	Provision of revised PCDP and grievance mechanism to Bank for review	During operation	EBRD requirement	Update will incorporate the latest community health and safety management measures as detailed above. Organize activities according to the plan	Updated and published on website. http://www.cleanenergy.mn/uploads/files /PCDP%20-%20Aug%202019%20- %20ENG.pdf
6.2	CSR ACTION: Identify community benefits and undertake CSR actions (i.e. funding of community events, provision of equipment, grievance mechanism etc.)	Reports on actions	During operation	Mongolian laws and ISO 9001 requirement	Identify local community needs and benefits to plan actions Implement the plan Community grievance log	Latest stakeholder meeting note provided to Lender's Engineer.
6.3	Compliance with National legislation	Receive permits/authorizations prior to action requiring authorization	During operation	Accordance with Mongolian law of Environmental protection.	Environmental Protection Plan and Monitoring Program 2022 to be submitted to the Ministry of Environment and Tourism (annual)	EPP 2021 submitted by Ministry of Environment and Tourism. http://www.cleanenergy.mn/uploads/files/SUPPLEMENTARY%20REPORT%200F%20SALKHIT%20WIND%20FARM%E2%80%99S%20DETAILED%20ENVIRONMENTAL%20IMPACT%20ASSESSMENT.pdf