

**OPERATIONS ENVIRONMENTAL AND SOCIAL ACTION PLAN 2016**

№	Action	Evaluation	Implementation Plan	Requirement	Status
<b>PERFORMANCE STANDARD 1: ENVIRONMENTAL AND SOCIAL APPRAISAL AND MANAGEMENT</b>					
1.1	<b>REPORT</b> 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.	<ul style="list-style-type: none"> <li>Submission of report on specified schedule.</li> </ul>	During operation	EBRD requirement	This report forms part of the reporting commitment to the Bank.
1.2	<b>DEVELOP AND IMPLEMENT</b> a Project Stakeholder Engagement Plan (SEP) in line with EBRD performance requirement.	<ul style="list-style-type: none"> <li>Information in annual report of any new developments in the region</li> </ul>	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.
1.3	<b>MONITORING PLAN:</b> 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.	<ul style="list-style-type: none"> <li>Environmental Monitoring Plan</li> <li>Quarterly audit results and actions undertaken</li> <li>Annual EHS Report to the Bank</li> </ul>	During operation	EBRD requirement and best practice	Undertake quarterly audit checklist.
1.4	<b>CONTRACTORS:</b> Manage all on-site contractors' Environmental and OHS performance for their actions.	<ul style="list-style-type: none"> <li>Review of OHS and environmental manager capacity</li> </ul>	During operation	Best practice	All on-site contractors must have qualified Environmental and HSE managers or they must strictly follow Clean Energy's Environmental and HSE managers' requirements.
1.5	<b>WASTE MANAGEMENT:</b> Develop and implement a comprehensive waste management plan/procedure to guide management of all wastes to be generated during operation.	<ul style="list-style-type: none"> <li>Reporting of waste disposal/recycling records.</li> <li>Records of unauthorized discharge of waste effluent</li> </ul>	During operation	ISO 14001 requirement and best practice	<ol style="list-style-type: none"> <li>Collect all waste transfer records and notes on site.</li> <li>Color coding system to be developed and implemented on site</li> <li>Organize periodic clean-ups of existing garbage to improve the landscape, particularly in and around the birch scrub</li> </ol>
<b>PERFORMANCE STANDARD 2: LABOUR AND WORKING CONDITIONS</b>					
2.1	<b>PROCEDURES:</b> Develop and implement occupational health and safety procedures relevant to wind park operation	<ul style="list-style-type: none"> <li>Procedures approved</li> </ul>	During operation	Mongolian occupational health and safety relevant standards	<ol style="list-style-type: none"> <li>Develop and implement all relevant HSE procedures</li> <li>All procedures must be communicated and signed off by all staff on site</li> </ol>

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2.2	<b>TRAININGS:</b> Develop and implement OHS training program to improve OHS documents disclosure and compliance. It must encompass, but not limited to: <ul style="list-style-type: none"> <li>Information on EMP and all associated procedures to all employees and subcontractors</li> </ul>	<ul style="list-style-type: none"> <li>Training needs identified</li> <li>Conduct the trainings</li> </ul>	During operation		<ol style="list-style-type: none"> <li>Identify OHS training needs for workers.</li> <li>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).</li> </ol>
<b>PERFORMANCE STANDARD 3: POLLUTION PREVENTION AND ABATEMENT</b>					
3.1	<b>SPILL:</b> Prepare and implement a Spillage management plan (fuel, etc.), including (but not limited to): <ul style="list-style-type: none"> <li>Cleanup kits (absorbent materials, etc.) carried in all vehicles and equipment at all times.</li> <li>Training for drivers and equipment operators, and others who use fuel, oil and other hazardous materials.</li> <li>Inspect all vehicles and equipment for leaks before use near or in water.</li> </ul>	<ul style="list-style-type: none"> <li>Monitoring</li> <li>Training</li> <li>Report to Bank</li> <li>Secondary containment in place</li> <li>Drip trays and spill kits for vehicles</li> <li>Spill kits located around the site and vehicles</li> </ul>	During operation	ISO 14001 requirement and best practice	<ol style="list-style-type: none"> <li>Provide cleanup kits for all vehicles</li> <li>Deliver training for all drivers and staff</li> <li>Inspect vehicles before use</li> </ol>
3.2	<b>EMISSIONS:</b> Maintain vehicles, motors and emergency generators to manufacturers' specifications to minimize emissions	<ul style="list-style-type: none"> <li>Monitoring of implement/n</li> </ul>	During operation	ISO 14001 requirement and best practice	<ol style="list-style-type: none"> <li>Constant inspection on vehicles, motors, equipment according to manufacturer's specifications and standards</li> </ol>
3.3	<b>WASTE:</b> Contain all sanitary wastes from site and provide appropriate treatment prior to permitted discharge.	<ul style="list-style-type: none"> <li>Records of waste treatment and disposal.</li> </ul>	During operation	ISO 14001 requirement and best practice	<ol style="list-style-type: none"> <li>Collect sanitary wastes in appropriate tanks</li> <li>Contract permitted subcontractor</li> <li>Collect waste transfer notes on site</li> </ol>
3.4	<b>WATER:</b> Groundwater resource and quality monitoring to determine potential impacts of the proposed on site borehole to other groundwater users.	<ul style="list-style-type: none"> <li>Reporting of assessment outcomes</li> </ul>	During operation	ISO 14001 requirement and best practice	<ol style="list-style-type: none"> <li>Water quality monitoring to take place</li> </ol>
<b>PERFORMANCE STANDARD 4: COMMUNITY HEALTH, SAFETY AND SECURITY</b>					
4.1	<b>FIRE SAFETY:</b> 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.	<ul style="list-style-type: none"> <li>Reporting of audit findings.</li> </ul>	During operation	Mongolian occupational health and safety relevant standards, ISO	<ol style="list-style-type: none"> <li>Conduct monthly fire inspections and mark the tags</li> <li>Organize fire drills and report</li> </ol>

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				18001 and best practice	
4.2	<b>TRAINING:</b> 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 non-emergency work during daylight hours at location near residences or other gathering places.	<ul style="list-style-type: none"> <li>Report to Bank on training and on complaints and responses.</li> </ul>	During operation	ISO 9001 and best practice	1. Toolbox talks to cover these topics
<b>PERFORMANCE STANDARD 5: BIODIVERSITY CONSERVATION AND SUSTAINABLE NATURAL RESOURCE MANAGEMENT</b>					
5.1	<b>CONTROL VEGETATION:</b> Identify suitable measures for controlling vegetation. Do not use herbicides to control vegetation on wind park. Control minor negative impact on views and landscape	<ul style="list-style-type: none"> <li>Reporting of site audit findings.</li> </ul>	During operation	Mongolian environmental relevant standards, ISO 14001 and best practice	<ol style="list-style-type: none"> <li>Plant vegetation around control compound and substation</li> <li>Plant native grass in areas disturbed during construction</li> <li>Provide gray water to ensure vegetation growth</li> <li>Implement reclamation plan when necessary</li> <li>Minimize the length and width of on-site and off-site roads to minimize removal of vegetation. Restore the additional and unintended roads to original condition by seeding.</li> <li>Communicate all staff about staying to the designated roads</li> <li>Monitor road condition regularly, then repair damaged and rutted roads</li> <li>Maintain grass cover on berms/ditches</li> </ol>
5.2	<b>BIRD &amp; BAT:</b> Undertake operational bird and bats monitoring.  Review of monitoring results to determine suitable mitigation measures.	<ul style="list-style-type: none"> <li>Reporting of monitoring outcomes and proposed mitigation</li> </ul>	During operation	EBRD requirement	1. Conduct bird and bat monitoring during operational phase
5.3	<b>BIRD &amp; BAT:</b> Training of operational personnel to undertake bird collision monitoring during operation of the wind farm.	<ul style="list-style-type: none"> <li>Training Records.</li> </ul>	During operation	EBRD requirement	1. Train operational staff in bird collision monitoring
5.4	<b>BIRD &amp; BAT:</b> 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	<ul style="list-style-type: none"> <li>Reporting of bird and bat collision monitoring outcomes</li> </ul>	During operation	EBRD requirement	<ol style="list-style-type: none"> <li>Monitor the bird mortality along the transmission line</li> <li>Develop Bird mitigation plan</li> </ol>

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	mitigation plan.	<ul style="list-style-type: none"> <li>Identification of suitable mitigation plan</li> </ul>			
5.5	<b>SOIL DISTURBNACE:</b> Conduct assessment of soil disturbance and erosion along all roadways (emphasis on water channel crossings), at between turbine locations, at control compound, along transmission road.	<ul style="list-style-type: none"> <li>Presentation of results</li> </ul>	During operation	Mongolian environmental relevant standards, ISO 14001 and best practice	1. Soil disturbance must be assessed and reported as part of the weekly monitoring
5.6	<b>FLORA &amp; FAUNA:</b> Implement flora and fauna management plan including best practice measures for the protection of biodiversity	<ul style="list-style-type: none"> <li>Reporting of site audits.</li> </ul>	During operation	Mongolian environmental relevant standards, ISO 14001 and best practice	<ol style="list-style-type: none"> <li>Prohibit marmot hunting on the site</li> <li>Communicate the plan to all staff during toolbox talk</li> </ol>
<b>OTHERS: INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT</b>					
6.1	<b>PLAN:</b> Update Public Consultation and Disclosure Plan (PCDP) and Grievance Mechanism	<ul style="list-style-type: none"> <li>Provision of revised PCDP and grievance mechanism to Bank for review</li> </ul>	During operation	EBRD requirement	<ol style="list-style-type: none"> <li>Update will incorporate the latest community health and safety management measures as detailed above.</li> <li>Organize activities according to the plan</li> </ol>
6.2	<b>CSR ACTION:</b> Identify community benefits and undertake CSR actions (i.e. funding of community events, provision of equipment, grievance mechanism etc.)	<ul style="list-style-type: none"> <li>Reports on actions</li> </ul>	During operation	Mongolian laws and ISO 9001 requirement	<ol style="list-style-type: none"> <li>Identify local community needs and benefits to plan actions</li> <li>Develop CSR actions plan</li> <li>Implement the plan</li> <li>Community grievance log</li> </ol>
6.3	Compliance with National legislation	<ul style="list-style-type: none"> <li>Receive permits/authorizations prior to action requiring authorization</li> </ul>	During operation	Accordance with Mongolian law	<ol style="list-style-type: none"> <li>Renew the water use contract (annually)</li> <li>Environmental Protection Plan and Monitoring Program 2017 to be submitted to the Ministry of Environment, Green Development and Tourism (annually)</li> </ol>