

Environmental and social action plan (May 2022.)

Environmental and Social Action Plan

#	Task/measure/corrective action	Purpose of action	Source of requirement	Responsibility	Measure of success	Deadline	Status
IFC PS1: Assessment and Management of Environmental and Social Risks and Impacts							
1.1	Submit report to the Lenders in accordance with requirements set out within the Environmental and Social Management Plan (ESMP) on environmental, social, health and safety (ESHS) performance and including status of each ESAP element and current status of ESHS issues.	To ensure measures within the ESIA and EIA are being implemented	IFC PS1	Ivicom Energy	Submission of report on specified schedule	Quarterly reports to be submitted during construction Six monthly reports during operation	
1.2	Appoint and maintain suitably qualified and experienced person(s) to be responsible for environmental, social, and occupational health and safety (OHS) for the Project.	To ensure that suitably qualified and experienced ESHS staff are working on the Project and are accountable to Project management.	IFC PS1	Ivicom Energy	Appointment of ESHS personnel	Prior to construction	Completed.
1.3	Produce the ESMP for construction (C-ESMP) and operation (O-ESMP) to implement management and mitigation measures specified within this ESIA addendum. Include an organogram, showing the organisational structure of the Project Management Team hierarchy and defining all key management roles, including for ESHS. Update ESMP with any additional mitigation as required as the Project progresses. Ensure that the engineering, procurement and construction (EPC) contractor or EPC management (EPCM) contractor develops a construction environmental and social management plan (C-ESMP) and associated sub plans and monitors compliance of construction sub-contractors.	Ensure environmental and social management measures prescribed within the ESIA are implemented	IFC PS1 Best practice	TSA/TIA/MSA, BoP and CW Contractor	C-ESMP produced	Prior to main construction activities	
1.4	Develop an Environmental, Health and Safety Management System (EHSMS) in line with international standards i.e. ISO 14001 (environmental) and OHSAS 18001 (health and safety)	Promote EHS culture within the organisation and meet international best practice Documentation of roles and responsibilities within Ivicom Energy	IFC PS1 Best practice	Ivicom Energy	Evidence of ISO accreditation	During Project lifetime	

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1.5	Include contractual clauses within the contractors' agreement that contractually requires compliance with international requirements and with the requirements of the ESMP/ESAP.	Ensure a unified adoption of international environmental, health, safety and social standards by all parties involved in the Project	IFC PSs Best practice	Ivicom Holding	Evidence of international environmental, health, safety and social contractual obligations within EPC/EPCM contractor contract	Ongoing from commencement of construction	Completed
1.6	Conduct weekly inspections of construction site and EPC/EPCM contractor's occupational health and safety (OHS) performance. Report on performance to Lenders every three months during construction. Report frequency to be increased in the event of significant issues/incidents on site.	Ensure EPC/EPCM contractor's adoption of international requirements for OHS	IFC PS1	Ivicom Holding	Throughout construction	Reports available and submitted to Lenders weekly/quarterly	
1.7	Update C-ESMP for operations (O-ESMP) and decommissioning (D-ESMP), including revision of sub-plans where necessary	To ensure that plans are appropriate to the current phase of the Project	IFC PS1	Ivicom Energy	O-ESMP and sub plans D-ESMP and sub plans	Prior to each change in project phase	
1.8	Publish the Project SEP on the Ivicom Energy website. Update regularly and implement the stakeholder engagement plan (SEP), including Project performance grievance mechanism. As part of the SEP, maintain a register of external communications including minutes of meetings held with stakeholders. Publish annual reports of key environmental and social aspects of the Project.	To maintain good stakeholder engagement and framework for sharing information with the public	IFC PS1	Ivicom Energy	SEP published and regularly updated Report to Lenders on consultation activities Six-months report to Lenders on all grievances received and how these	Throughout Project lifecycle	

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1.9	Develop and implement contractor/subcontractor Management Plan to manage ESHS planning and performance of construction and other contractors, including at a minimum: <ul style="list-style-type: none"> • Inclusion of relevant ESAP requirements in contracts/subcontracts. • Clear assignment of Ivicom and contractor ESHS responsibilities. • Contractor reports to include relevant data in reports to Lenders, and to allow evaluation of need for corrective actions. • Verification of training and/or proper credentials for contractor staff/managers responsible for ESHS 	ESHS management of contractors and subcontractors	IFC PS1	Ivicom Holding TSA/TIA/MSA, BoP and CW Contractors	Development and implementation of contractor management system ESHS reports to lenders on contractors' oversight	Ongoing from commencement of construction	
1.10	Publish the Non-Technical Summary (NTS) of the ESIA addendum on the Ivicom Energy website. Make hard copies of documents available in Ivicom offices and municipal offices.	To inform the public on foreseen impacts and planned mitigation measures	IFC PS1	Ivicom Energy	NTS published, hard copies available	Prior to construction	Completed
IFC PS2: Labour Working Conditions							
2.1	Monitor contractor and supplier performance in management of recruitment and labour issues, including management of worker grievances (pls., check the comment in the track changes version)	Prevent worker grievances	IFC PS2 Best practice	Ivicom Energy	Limited number of labour grievances which are quickly resolved	Ongoing from commencement of preparation for construction	

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2.4	<p>Develop and implement an OHS plan(s) to guide all activities on project site during site preparation, construction, and operation and ensure that all contractors adopt these plans. Requirements to include, at a minimum:</p> <ul style="list-style-type: none"> • Job and task-specific hazard analysis and controls for all activities • Provision of personal protection equipment (PPE), requirements for use of PPE, and enforcement of PPE use • Safety training for all personnel in their language, covering hazards and safety protocols of their jobs • Special training for specific hazards: working at heights, in excavations, with electricity • Review and approval of contractors' OHS plans • Oversight of contractor OHS implementation, including mandatory reporting • Recording incident statistics, including total work hours, lost time incidents, major injuries, fatalities, etc. 	Promote OHS and prevent any incidents	IFC PS2 Best practice	Ivicom Energy Contractors	OHS plans developed Zero incidents	Ongoing from commencement of preparation for construction	

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IFC PS3: Resource Efficiency and Pollution Prevention							
3.1	<ul style="list-style-type: none"> Integrate and maintain mitigation measures associated with pollution prevention identified in the ESMP into the C-ESMP. This should include as a minimum: Maintain equipment and take other measures to keep noise to a minimum, including avoiding/minimizing use of equipment at night. Monitor for noise at receptor locations upon request by affected people. Implement appropriate mitigation if noise exceeds applicable standards. Develop and implement construction phase dust suppression plan to ensure dusty loads are sheeted and unsealed roads are damped-down. Develop and implement waste and hazardous materials management plans for construction and operation phases, to cover all liquid and solid wastes and materials (chemicals, fuel, construction debris, excess spoil, domestic/household wastes, spill cleanup debris, etc.). Maximize waste reduction, reuse, recycling, etc. Earthen material management measures: <ul style="list-style-type: none"> Segregate and store in stable piles all topsoil and subsoil salvaged from construction areas. Store rock in stable piles. Protect all storage piles with covers, including vegetative cover (native grass species) as needed to prevent wind/water erosion and desiccation. Use best practices to prevent or retard run-off. Reinstate all disturbed areas by covering with topsoil and seeding/planting with native species, or returning to tillage. 	Promote EHS culture within the organisation and meet international best practice.	IFC PS3 Best practice.	Ivicom Energy Contractors	Development of C-ESMP No environmental incidents. In case of incidents, imminent remedy and respective report produced	Prior to and throughout construction	

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PS4: Community Health, Safety and Security							
4.1	<p>Implement safe practices through the C-ESMP during construction to minimise potential impacts to local communities during construction as specified within the ESMP</p> <p>Plans and procedures to include, as a minimum:</p> <ul style="list-style-type: none"> • Traffic management plan. • Public notices of hazards associated with works and equipment during construction and operation. • Emergency preparedness and response plan. • Security measures to prevent unauthorised access during construction and minimize access to substation and turbine interiors during operation. • Develop and implement traffic and transport management plan(s) to include access, routing, diversions, exceptional loads, and driver training. Consult with local stakeholders and provide timely information to users of land of times access to their land may be necessary, or limited. Contracts must ensure compliance with plan(s). Plans must cover transport of turbines, rock/stone, and other materials to be brought to or removed from the site. • During construction and operation, monitor noise at residences upon request and take actions to reduce or control noise as needed to meet applicable standards. Ensure proper noise controls on vehicles and equipment. When designing the substation, use technology whose specifications ensure that noise standards will not be exceeded. 	Promote good practice during construction and to protect the health and safety of local communities.	IFC PS4 Best practice	Ivicom Energy Contractors	Development of C-ESMP In case of community grievances/ complaints, imminent reaction towards the remedy, followed by the respective report(s)	Throughout construction	
IFC PS5: Land Acquisition and Involuntary Resettlement							
5.1	Integrate and maintain mitigation measures relating to land acquisition and compensation identified in the ESMP into the C-ESMP	<p>Prevent economic displacement resulting from land acquisition and/or Project related transport and traffic</p> <p>Prevent grievances from affected land owners and users</p>	IFC PS2 Best practice	Ivicom Energy	Development of C-ESMP Limited number of grievances which are quickly resolved	Prior to construction	Completed

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5.2	Consider all grievances received in relation to compensation for affected land and assets or damages, including those under the responsibility of the municipality (e.g. expropriation) and address them/cooperate with responsible authorities to address them	Prevent economic displacement resulting from land acquisition and/or Project related transport and traffic Prevent grievances from affected land owners and users	IFC PS2 Best practice	Ivicom Energy	Development of C-ESMP Limited number of grievances	Prior to construction and throughout Project lifecycle	

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FC PS6: Biodiversity Conservation and Sustainable Management of Living Material							
6.1	<p>Integrate and maintain mitigation measures relating to biodiversity and sustainable management of living materials identified in the ESMP into the C-ESMP and O-ESMP</p> <p>This should include as a minimum:</p> <p>1) Appoint qualified professional(s) with expertise in birds and bats to:</p> <p>a) undertake pre-construction tree surveys for roosting bats, including ground level inspections, tree climbing and/or emergence/re-entry surveys to inform mitigation measures prior to and/or during felling.</p> <p>b) undertake a breeding bird survey of habitats affected during construction to determine locations of active nests, should works be undertaken between March and August.</p> <p>c) devise a methodology for bird and bat carcass monitoring of the WTGs and OHL over a minimum of three years from the first year of operation.</p> <p>The aim will be to:</p> <ul style="list-style-type: none"> - Assess adequacy of previous characterisation(s) of bird/bat use, residence, and passage - Re-evaluate impacts on birds and bats - Recommend changes to operating parameters (such as rotation speed or operating hours during sensitive periods/hours) and/or other mitigation - Reassess cumulative impact assessment on birds and bats and recommend additional mitigation, if required. <p>2) Appoint qualified professional(s) with expertise in botany to:</p> <p>a) undertake pre-construction botanical surveys of permanent and temporary affected areas to map and record threatened, endemic and invasive plant species.</p> <p>c) prepare and oversee implementation of the HRRP and AIS.</p> <p>b) undertake monitoring of mitigation planting using native species and seeding over 10 years post construction.</p>	Minimise habitat loss and meet international best practice.	IFC PS6 Best practice.	Ivicom Energy Contractors	Development of C-ESMP Limited habitat loss	Prior to and throughout construction and operation	

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IFC PS8: Cultural Heritage							
8.1	Develop and implement mitigation measures as part of the C-ESMP as identified in the ESMP	Minimise potential loss of cultural heritage Meet international best practice.	IFC PS8 Best practice.	Ivicom Energy Contractors	Development of C-ESMP Compliance with chance finds procedure	Prior to construction	