

Appendix D: Environmental and Social Action Plan – DRAFT: 13.05.16

N O.	ACTION	ENVIRONMENTAL & SOCIAL RISKS (LIABILITY/BENEFITS)	REQUIREMENT (LEGISLATIVE, EBRD PR, BEST PRACTICE)	RESOURCES, INVESTMENT NEEDS, RESPONSIBILITY	TIMETABLE	TARGET AND EVALUATION CRITERIA FOR SUCCESSFUL IMPLEMENTATION	STATU S
<b>PR1 PS1</b>	<b>Assessment and Management of Environmental and Social Impacts and Issues Assessment and Management of Environmental and Social Risks and Impacts</b>						
1.1	<p>Company will implement the current corporate EHS management systems on this project, aligned with the requirements of the ISO 14001 and OHSAS 18001 standards. Develop the project-specific procedures and responsibilities required by the ESMS of both Alcazar Energy and Gamesa and resolve any overlap / conflict that might exist between the two systems.</p> <p>As part of the ESMS development, clearly define reporting structures and responsibilities and monitoring, reporting and review procedures for the Project. Include means for coordination with NEPCO.</p> <p>The ESMS will include a shut down procedure in case of impact on bats and birds and be developed by an Independent Ornithological Expert (IOE)</p>	<p>The ESMS for the project is still at a relatively early stage of development. Developing and implementing the system in full will help ensure project related impacts and benefits are appropriately managed.</p>	<p>EBRD PR 1, IFC PS1 Best practice</p>	<p>Company time</p>	<p>Implement corporate EHS management system to the project.</p>	<p>EHS management systems to be implemented in line with: ISO 14001 and OHSAS 18001 certification standards, IFC PS1, EBRD PR1, and corporate EHS management system</p>	
1.2	<p>Undertake detailed ESIA of the overhead transmission line (OHL), ideally linked with the process of deciding the final line routing (in particular prior to the finalisation of the design) and tower locations, so that sensitive receptor and key impact avoidance, can be factored into the detailed design.</p>		<p>EBRD PR 1 IFC PS1</p>	<p>Competent sub-consultant</p>	<p>Before final detailed design completed</p>	<p>Report findings of updated assessments. Exert best efforts in arranging implementation of additional mitigation identified in assessments, as appropriate, and report to EBRD. Minimal adverse impacts.</p>	

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1.3	Ensure information on seismic effects is reviewed, and if this is advised to be a risk area, include required mitigation into the final turbine design and use best efforts to ensure inclusion in the OHL tower design.		EBRD PR 1 IFC PS1 Best Practice	Competent sub-consultant	Before final detailed design completed	Provide additional information. Implement additional mitigation identified in assessments, as appropriate and report to EBRD. Minimal adverse impacts.	
1.4	Develop the remainder of the required project-specific, ESMPs as soon as possible, particularly for construction. Include the requirements of the ESIA, permits and approvals and other contractual requirements.	This is a gap in management controls with construction scheduled as soon as early summer.	Jordanian law EBRD PR 1 IFC PS1	Project Company EPC Specialist Resource	As soon as possible and pre-construction for plans with a construction-related component, prior to operation for operational plans	ESMPs in place and awareness training undertaken for appropriate staff. Evidence of implementation in reporting to Lenders.	
1.5	Implement mitigation measures in the ESIA, including the ESMP in Chapter 22 and any permit conditions included in Permits, as approved by Competent Authorities.		Jordanian law EBRD PR 1 IFC PS1		Throughout design, construction, and operation	Mitigation measures implemented by contractors and Alcazar Energy, as appropriate. Minimal adverse impacts. Report to EBRD Status of mitigation implementation.	

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1.6	<p>In keeping with a precautionary approach and in order to identify potential employees for construction and operation, conduct a limited socio-economic field survey using a social questionnaire collecting information on: family structure, education, livelihood streams and average income, existing health data among local communities, etc.</p> <p>The survey should cover a representative sample of vulnerable groups in the Project area, such as women and Bedouin, and from within each of the potentially affected surrounding villages. Previous consultation activities can be used as contributing information to this survey. The data obtained from the survey should be used to inform the contractor and operator on potential employees. It may also be used to update the LACF as needed.</p>	<p>To avoid unduly differential impacts of the project, or receipt of project benefits, on vulnerable groups</p> <p>This will also allow a more informed social monitoring programme</p>	<p>EBRD PR 1 IFC PS 1</p>	<p>Project Company with assistance from external consultants</p>	<p>Prior to construction commencement</p>	<p>Evidence provided to Lenders that the survey has been completed including methodology employed.</p> <p>Specific measures for vulnerable groups included in the ESMS and supporting plans.</p>	
1.7	<p>Include relevant design and construction requirements from this ESAP and ESMP/ESIA into tenders and contracts, including:</p> <ul style="list-style-type: none"> <li>• clear assignment of responsibilities within contractors' organizations for E&amp;S issues and clear reporting lines to Alcazar Energy</li> <li>• reports on performance sufficient to allow Alcazar Energy to evaluate project/contractor performance and to design corrective actions as necessary, as well as to include all relevant data in Alcazar Energy reports to the Lenders</li> </ul>	<p>This is a critical area in ensuring that the requirements of EBRD and IFC are implemented on the project.</p>	<p>Jordanian law EBRD PR 1 IFC PS1</p>	<p>Project Company</p>	<p>Upon entry into contracts/ subcontracts Reporting: throughout contractor performance</p>	<p>Alcazar Energy approval of contractor ESMS and organization / staffing Alcazar Energy reports to Lenders include contractor performance data</p>	

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1.8	<p>Appoint an employee with the appropriate skills and qualifications to be a Community Liaison Officer (CLO). Activities should be aligned with the Stakeholder Engagement Plan (SEP).</p>	<p>To liaise with local communities and authorities on a regular basis, analyse these interactions, and provide updates and practical recommendations to the Project management team.</p>	<p>EBRD PR 1 EBRD PR 10 IFC PS 1</p>	<p>Project Company</p>	<p>Prior to construction commencement</p>	<p>Appointment of a CLO</p>	
1.9	<p>Appoint an independent bird and bat expert referred to as the Independent Ornithological Expert (IOE) for a 3 year period. The Company will engage an independent ornithological and bat expert for a period of 3 years to perform post-construction monitoring.</p> <p>This 3 year contract will be a renewed engagement on a rolling 3 year basis, as needed, based on the recommendations of the independent expert at the end of each period.</p> <p>The need for monitoring and frequency of monitoring will be agreed with the Lenders at the end of each 3 year period based on data available.</p>	<p>To review operations and assist management and Lenders to limit negative environmental impact. The IOE will have the power to shut down turbines, if material risk to protected bird and bat species occurs.</p>	<p>EBRD and best practice</p>	<p>External expert (s)</p>	<p>Appointment prior to start of operation, with a non Objection by the Lenders.</p> <p>Every 3 years review of contract and scope of monitoring agreed with Lenders.</p>	<p>Annual report from IOE</p>	
1.10	<p>Submit regular reports to the Lenders on environmental, social, health and safety performance, including compliance with each ESAP requirement.</p> <p>This will include a report prepared by the IOE. The IOE annual report will be shared with RSCN and BirdLife.</p>	<p>To help maintain transparency and engagement in the management of the project.</p>	<p>EBRD PR 1 IFC PS</p>	<p>Project Company</p>	<p>Each six months during construction</p> <p>Annually during operation</p>	<p>Submission of reports to Lenders on schedule and in a mutually agreed format, with agreed supporting documentation</p>	
<p><b>PR2 Labour and Working Conditions</b> <b>PS2 Labor and Working Conditions</b></p>							

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2.1	<p>Develop and adopt a Human Resource Policy and management system covering all employees, contractors and sub-contractors.</p> <p>The policy to provide for oversight of contractor policies/procedures.</p> <p>Access by all workers to policy/procedures in their language,</p>	<p>To ensure management of workforce in line with EBRD and IFC requirements including prevention of child labour, forced labour, tolerance of workers associations, rethrenchment principles and encouragement of non-discrimination.</p>	<p>EBRD PR 2 IFC PS 2</p>	<p>Project Company</p>	<p>Prior to contracting any contractor or sub-contractor</p>	<p>HR policy developed in line with IFC PS2 and EBRD PR2 and adopted: prior to further construction activities.</p> <p>Contractor policies/procedures reviewed/ approved: prior to work on-site.</p> <p>HR Policies implemented throughout construction and operation.</p>	
2.2	<p>Maintain formal grievance mechanisms for employees and contractors and disseminate information about its uses to the workforce.</p>	<p>To provide a channel for raising workers concerns and transparent, consistent mechanism for resolution.</p>	<p>EBRD PR 2 IFC PS 2</p>	<p>Project Company</p>	<p>Prior to construction activities</p>	<p>Development and adoption of workers grievance mechanism.</p> <p>Quarterly report on grievances and resolutions.</p>	
2.3	<p>Document the Project Company's labour accommodation strategy and principles. Check proposed accommodation against the strategy and update any plans if needed.</p> <p>If an onsite camp is required:</p> <ul style="list-style-type: none"> <li>• The local authorities and communities should be consulted regarding the location of any camp.</li> <li>• Establish a code of conduct for workers at the camp.</li> <li>• Camp should be designed and operated to meet EBRD/IFC Workers' accommodation: processes and standards.</li> </ul>	<p>To standardise accommodation provided to workers employed by the Project Company and contractors.</p> <p>To minimise influx impacts if any.</p>	<p>EBRD PR 2 IFC PS 2</p>	<p>Project Company EPC</p>	<p>Prior to construction of any future labour accommodation or labour being accommodated at site</p>	<p>Labour accommodation strategy documented and cascaded to contractors</p> <p>Any worker accommodation compliant with EBRD PR 2, IFC PS2</p>	
2.4	<p>Supply chain audits for low labour cost supply items and any other at-risk suppliers</p>	<p>To prevent child labour or forced labour in the supply chain</p>	<p>EBRD PR 2 IFC PS 2</p>	<p>Project Company</p>	<p>First audit in the first quarter following construction commencement</p>	<p>Supply chain audits completed and provided to Lenders</p>	

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2.5	Ensure that there is adequate human resources and other staff in the Amman office and on site to manage E&S issues.	To ensure workforce management and implementation of E&S management plans	EBRD PR 2 IFC PS 2	Project Company	Prior to construction commencement	Appointed E&S manager, CLO and other relevant staff	
	Support local labour force and economy by: <ul style="list-style-type: none"> <li>Providing realistic information on employment opportunities</li> <li>Encouraging contractors to maximize local hiring and local materials sourcing</li> <li>Providing opportunities for local firms to subcontract supplies and services where possible.</li> </ul>	To maximise project benefits to the local community and help deliever on expectations that are evident in the local community	Jordanian law EBRD PR 2, IFS PS2	Project Company EPC	Prior to workforce selection	Local announcements when hiring. Contractor reporting to Alcazar Energy on local hiring and sourcing. Report to Lenders of summary of project hiring, including local hiring and local sourcing.	
<b>PR3 Resource Efficiency and Pollution Prevention and Control</b> <b>PS3 Resource Efficiency and Pollution Prevention</b>							
3.1	Develop ESMS to include: <ul style="list-style-type: none"> <li>A detailed wastewater drainage strategy;</li> <li>Identification of competent and appropriately licensed wastewater contractor;</li> <li>Site workers to be trained on the correct transfer and handling of fuels and chemicals;</li> <li>Relevant personnel to receive adequate spill response and spill kits use training; and</li> <li>Ensure provision of portable spill containment and clean up equipment.</li> </ul>		PR3, PS3 Best Practice	Project Company EPC	Prior to construction activities	ESMS available and implemented	
3.2	Develop waste management strategy, to ensure that well managed disposal routes are implemented for hazardous waste, as well as best practice options for waste segregation, reuse, recycling and feasible landfill diversion.		Best Practice	Project Company EPC	Prior to construction activities	Waste management strategy available and implemented	

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<b>PR4 Health and Safety</b> <b>PS4 Community Health, Safety, and Security</b>							
4.1	Ensure the construction and maintenance contractors have formalised health and safety management systems in place for the following risks: Over-Exertion; Slips and Falls; Struck by objects; Moving Machinery; Confined Space and Excavations; Working at Height; Working in Remote Areas; Lone and Isolated Workers; and Lifting Operations.	Minimise injuries/ fatalities due to accidents.	IFC General EHS Guidelines (2007), IFC Guidelines for Wind Energy (2015)	EPC Contractor and Project Operator	Prior to construction commencement.	OHSP includes procedures formalised health and safety management systems.	
4.2	Ensure formal access and traffic safety plans are in place and agreed with the relevant authorities to include: Traffic Safety plan and Public Access Management plan which uses gates on access roads during the construction period only to ensure public safety.	Mitigate potential impacts on the highway network. Minimise injuries/ fatalities due to accidents. Public safety and security.	IFC General EHS Guidelines (2007), IFC Guidelines for Wind Energy (2015)	EPC Contractor and Project Operator	Before construction and prior to transport of wind turbine component parts to the Project site.	The following plans are available and agreed with relevant authorities: Traffic Safety plan; Public Access Management plan.	
4.3	Ensure risks associated with Blade and Ice Throw are considered and actions to prevent these are put in place.	Minimise injuries/ fatalities due to accidents.	IFC Guidelines for Wind Energy (2015)	EPC Contractor and Project Operator	Before design completed, before construction and operation.	Blade and Ice Throw risk strategy and operational procedures include control and shut down procedures.	
4.4	Ensure all consultations and responses received regarding aviation and telecommunication Systems including providing final coordinates of the turbines to CARC and developer must liaise with RJAF; navigational lighting obstacles; formal responses obtained from Orange and Zain to confirming they have no objection.	Flight safety risks. Wind turbines could potentially cause electromagnetic interference with telecommunication systems.	Compliance with National Regulations, CARC, IFC Guidelines for Wind Energy (2015)	Developer	Before construction	Consultation with CARC results in letter of compliance and formal responses obtained from Orange and Zain.	
4.5	A Security Risk Assessment should be carried out both for the construction and ongoing operation of the Project to ensure employee, contractor and public safety as well as to avoid trespassing incidents, theft and malicious damage.	Public safety and security.	IFC Guidelines for Wind Energy (2015)	EPC Contractor and Project Operator	Before construction	A Security Risk Assessment is conducted, including creation of rules of intervention of public security forces	

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4.6	Ensure Health and Safety Performance systems and procedures are in place to include: periodic safety meetings; Organizational Health and Safety Performance data is compared with released industry-specific data; and Health and Safety Performance Monitoring.	Optimised health and safety performance.	IFC Guidelines for Wind Energy (2015), General EHS Guidelines (2007)	EPC Contractor and Project Operator	Before construction and before operation.	Health and Safety Performance systems, procedures, monitoring, audits are in place.	
4.7	Project specific Emergency Response Plan should include the guidance in the IFC standards.	Minimise injuries/ fatalities due to accidents	PS1	EPC Contractor and Project Operator	Before construction and before operation.	Project specific Emergency Re-sponse Plan is available.	



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4.8	Undertake further noise assessment to include: <ul style="list-style-type: none"> <li>• amended assessment criteria to ensure that IFC guidelines for the “most stringent” criteria are followed, and to take account of impacts due to relative changes in the existing noise environment;</li> <li>• update baseline noise survey to take account of the IFC guidelines on equipment, measurement periods, derivation of background levels, local wind speeds, full details of receptor identification, measurement equipment and the microphone positioning and concurrent measurements of wind speed.</li> <li>• An outline assessment of construction impacts, including construction vehicles, based on a justified set of assumptions should be undertaken.</li> <li>• update predictions of noise impacts.</li> <li>• The assessment of operational impacts to be updated to accommodate the recommended changes in the criteria and baseline methodology, any revised predictions, and a feasibility assessment of the proposed approach to mitigating impacts to nomadic peoples;</li> <li>• The potential for cumulative noise impacts should be reviewed.</li> </ul>	Minimise noise impacts	IFC EHS General Guidelines	Project Company	Before construction	Report findings of further assessment  Implement additional mitigation as appropriate	
PR5 PS5	<b>Land Acquisition, Involuntary Resettlement and Economic Displacement</b> <b>Land Acquisition and Involuntary Resettlement</b>						

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5.1	<p>Develop and disclose a Land Acquisition and Compensation Framework (LACF) including a Grievance Mechanism.</p> <p>Ensure the LACF includes non-monetary livelihood restoration measures (such as alternative pasture lands analysis as needed) as well as basic compensation for acquired land and access rights. The LACF should include a consideration of extending non-monetary measures to the wider community (not just affected parties).</p>	<p>To set out the Project company's framework for land lease and acquisition, principles, regulatory framework, implementation steps and schedule, documentation and monitoring requirements.</p> <p>Systematic maintenance of current good practice in this regard.</p>	EBRD PR 5 IFC PS 5	Project company with assistance from external consultants	Prior to construction or finalisation of any land acquisition, lease or use agreements.	LACF and grievance mechanism drafted and adopted	
5.2	<p>Identify vulnerable groups and determine assistance requirements and means to ensuring meaningful participation in any livelihood restoration process.</p>	<p>To avoid differential impacts of land acquisition on vulnerable groups</p>	EBRD PR 5 IFC PS 5	Project company with assistance from external consultants	As soon as possible and prior to construction	Specific measures for vulnerable groups included in LACF	
	<p>Gap analysis of on-going and completed land lease and land acquisition activities in relation to land acquired by the Project Company against the LACF.</p> <p>Implement mitigation measures, where needed, if any.</p>	<p>To mitigate the impacts of economic displacement and restricted access on affected parties.</p>	EBRD PR 5 IFC PS 5	Project company with assistance from external consultants for the gap analysis	As soon as possible and prior to further land take/lease	Gap analysis submitted to the Lenders	
<p><b>PR6 Biodiversity and Living Natural Resources</b> <b>PS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</b></p>							
6.1	<p>Implement standard animal safety / welfare measures such as securing excavations to prevent animals becoming trapped, and appropriate storage of hazardous materials and machinery should referenced.</p>	<p>To minimise impacts on biodiversity.</p>	EBRD PR 6 IFC PS 6	Project Company	Prior to construction	Standard welfare measures adopted Workers trained in implementation	

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6.2	Undertake pre-construction survey of the entire Project footprint (including proposed OHL route as part of the ESIA for that component) in order to identify spur-thighed tortoise, or suitable habitat features/hibernacula thereof. If spur-thighed tortoises are identified develop a relocation strategy to comprise a review of potentially suitable receptor sites, including survey work to establish the status of any existing populations in such areas.	To minimise impacts to protected species.	EBRD PR 6 IFC PS 6	Project Company	Prior to construction	Survey reporting. Recommendations / mitigation measures implemented for the wind farm and best efforts used to ensure implementation of mitigation measures for the OHL.	

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6.3	<p>Undertake further assessment and review of bird related issues for the Project and the overhead line including:</p> <ul style="list-style-type: none"> <li>assessment of population-level effects of the operational wind farm on migrating birds;</li> <li>Periodically (i.e. at least as often as the end of each migration period) review ongoing monitoring data, together with such data as is available from other windfarms in Jordan, to determine whether or not bird migration routes are being displaced. In addition the Project Company must cooperate with any wider assessment of windfarm impacts or displacement initiated by the national authorities or national ornithological society. If such review or assessment identifies displacement, optimise the monitoring and management plan and any active turbine management plan accordingly and agree the changes with the Lenders and relevant national bodies. The frequency of this monitoring may be adapted over time to reflect its requirement in light of ongoing results, in agreement with the Lenders; and</li> <li>breeding bird survey to include the entire Project footprint (and proposed OHL route). Information from this survey should be used to inform specific mitigation measures with regards timing of works and micrositing of infrastructure where appropriate</li> </ul>	To minimise impacts to protected species.	EBRD PR 6 IFC PS 6	Project Company	Prior to construction and during operation.	Report findings of further assessment. Survey reporting. Recommendations / mitigation measures implemented for the wind farm and best efforts used to ensure implementation of mitigation measures for the OHL.	

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6.4	Undertake additional bat survey comprising: <ul style="list-style-type: none"> <li>• installation of static detectors at proposed turbine locations,</li> <li>• walked transects at the areas of the new layout not previously surveyed.</li> </ul>	To minimise impacts to protected species.	EBRD PR 6 IFC PS 6	Project Company	Prior to construction	Survey report. Recommendations / mitigation measures implemented.	
6.5	Ensure the following actions are undertaken: <ul style="list-style-type: none"> <li>• Implementation the shut down and turbine management procedure developed by the IOE and agreed with Lenders</li> <li>• The independent bird and bat expert shall have the authority to shut-down operations if needed in line with the above procedure.</li> <li>• Data from bird and bat monitoring as well as any shut down action and recommendations will be shared with the Lenders RSCN and Bird Life.</li> </ul>	To minimise impacts to protected species.	EBRD PR 6 IFC PS 6	Project Company	During operation	Expert engaged. Recommendations / mitigation measures of expert implemented. Data shared with RSCN and Bird Life.	
<b>PR8 Cultural Heritage</b> <b>PS8 Cultural Heritage</b>							
8.1	Develop a chance find procedure for use during construction. Train workers, contractors and sub-contractors in the implementation of the chance find procedure.	To ensure that any archaeological finds will be preserved during the construction process.	EBRD PR 8 IFC PS 8	Project Company	Prior to construction	Chance Finds Procedure adopted. Workers trained in implementation.	
8.2	Ministry of Tourism & Antiquities to be kept informed of discussions between the PDTRA Chief Commissioner and UNESCO.	To help maintain transparency and engagement in relation to potential impacts on Petra WHS.	EBRD PR 8 IFC PS 8	Project Company	Prior to construction	Evidence of communication with MoTA	
<b>PR10 Information Disclosure and Stakeholder Engagement</b>							

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10.1	Implement the SEP, including immediate stakeholder engagement and stakeholder grievance mechanism. As part of the SEP maintain a register of external communications including minutes of meetings held with stakeholders. Update the SEP	To maintain good stakeholder engagement and framework for sharing information with the public.	EBRD PR 10 IFC PS 1 Best Practice	Project Company	Commence implementation immediately Continue throughout construction and operation	Report to Lenders on consultation activities, including information disclosed Report to Lenders on all grievances received and how addressed/resolved	
10.2	Develop and update a website to be used to disclose project information and documentation, such as the SEP and its associated documents. Once the website has been created provide periodic updates.	To generate an accessible channel of information disclosure and feedback loop	EBRD PR 10 IFC PS 1	Project Company	As soon as possible in line with ESIA disclosure schedule	Project website created and link disseminated to stakeholders and Lenders	
10.3	Disclose a Corporate Social Responsibility (CSR) plan outlining the project company's principles and criteria for selecting contributions, recent activities and their beneficiaries.	Transparency around CSR initiatives	Best practice	Project Company	As soon as possible and at least 1 month prior to construction	CSR plan disclosure on Project / Company website	
10.4	Publish a CSR report	Enhancing stakeholder communication	EBRD PR 10 recommendation Best practice	Project Company	1 year after commencement of projects, and then annually.	CSR report published	