

Environmental and Social Action Plan July 2022, Neo 1 Solar (Lesotho)

No.	Performance Standards	Deliverables	Timeline
<i>PS1 Assessment and Management of Environmental and Social Risks and Impacts</i>			
1.	<p>The PE will be required to update the Environmental and Social Management System (ESMS) and associated management plans in line with the requirements of MIGA’s Performance Standards (PSs) 1 and Lesotho national regulations for the construction and operation phase.</p> <p>a) The updated ESMS for the construction phase shall include the following items:</p> <ul style="list-style-type: none"> (i) Health and Safety, Social and Environmental (HSSE) Policy, (ii) identification of the risks and impacts, (iii) management programs and plans, (iv) organizational capacity, responsibilities and competence, (v) emergency preparedness and response mechanisms and (vi) updated Environmental, Social, Health and Safety Management Plan (ESHS MP) with monitoring actions and an overarching system for reporting and tracking non-compliances. <p>b) ESMS for O&M phase.</p>	<p>Submit to MIGA the:</p> <ul style="list-style-type: none"> a) Updated ESMS and evidence to MIGA of the existence of adequate policies, procedures, practices, and management programs b) The ESMS for O&M 	<p>(a) Within 30 days of the Effective Date</p> <p>b) 3 months prior to the project operations.</p>
2.	<p>The PE will be required to update the HSSE Policy as part of the ESMS in line with MIGA PS 1 requirements.</p>	<p>Submit to MIGA the updated E&S policy</p>	<p>Prior to MIGA Contract of Guarantee (CoG) signing</p>
3.	<p>The PE and the EPC/O&M Contractor will be required to update the Project ESMPs for construction and operation phases to include appropriate measures such as erosion management through vegetation management and soil stabilization and regular monitoring to ensure early detection of issues and monitoring and reporting requirements in line with MIGA’s PSs and WBG EHS guidelines.</p>	<p>Submit to MIGA the:</p> <ul style="list-style-type: none"> a) Updated ESMPs for construction 	<p>a) Within 1 months of the Effective Date.</p> <p>b) 30 days prior to Project Operation</p>

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		b) ESMPs for O&M	
4.	<p>The PE will be required to update the Emergency Preparedness and Response Plan (EPRP) to address the facility wide risks including fire and other external emergencies for the Project construction and operation in line with MIGA PS1 requirements. The EPRP will articulate the steps needed to collaborate with nearby communities, local government agencies, and relevant third parties to facilitate response to emergency situations to prevent and mitigate harm to people and/or the environment. The EPRP also describes reporting requirements and roles and responsibilities of the PE and the EPC contractor.</p> <p>a) EPRP for construction phase b) EPRP for O&M phase</p>	<p>Submit to MIGA the:</p> <p>a) EPRP for construction phase</p> <p>b) EPRP for operation phase</p>	<p>a) Within 1 month of the Effective Date of the Contract of Guarantee</p> <p>b) 30 days prior to Project Operation</p>
5.	<p>The PE will be required to develop a site decommissioning and rehabilitation plan in line with the MIGA requirements and Lesotho national requirements.</p>	<p>Submit the project decommissioning and rehabilitation site closure plan</p>	<p>At least 6 months prior to commencing decommissioning activities</p>
6.	<p>The PE will be required to appoint a qualified Project E&S team that will include an Environmental Control Officer (ECO), Health and Safety (H&S) Officer and Community Liaison Officer (CLO) to manage the projects E&S risks and impacts during construction in line with the requirements of MIGA's PS1. The PE will also appoint competent E&S team during the operations phase.</p>	<p>Submit to MIGA the appointed Environmental Control Officer (ECO), Health and Safety (H&S) Officer and Community Liaison Officer (CLO) CVs and appointment letters.</p> <p>Share the Organogram of E&S Team.</p>	<p>Prior to MIGA Contract of Guarantee (CoG) signing</p>
7.	<p>The PE will require the EPC and O&M Contractor to develop Environmental, Health and Safety (EHS) monitoring procedures which ensure that EHS monitoring reports detail EHS risks, OHS statistics, and mitigation measures during the construction and operations phase in line with MIGA PS 1 requirements.</p>	<p>Submit to MIGA the HSSE Inspection and Audit Plan</p>	<p>Within 30 days of the Effective Date</p>
8.	<p>The PE will be required to update the SEP (including updates from all the stakeholder engagements conducted in the last 3 years) and submit the finalized SEP that covers the construction and operations phases and is in line with MIGA PS1 requirement.</p>	<p>Submit to MIGA the revised SEP</p>	<p>Within 30 days of the Effective Date</p>

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9.	<p>The PE, EPC and O&M Contractor will develop a project specific, formal Grievance Committee and Community Grievance and External Communication Mechanism that includes GBVH reporting mechanisms, in line with the requirements of MIGA PS 1 for the Project construction and operation phases.</p> <ul style="list-style-type: none"> a) PE and EPC contractor b) O&M Contractor 	<p>Submit to MIGA:</p> <ul style="list-style-type: none"> a) PE and EPC Community Grievance and External communication Mechanism, evidence of Grievance Committee Members and evidence of GM procedure training. b) O&M Community Grievance and External Communication Mechanism. 	<ul style="list-style-type: none"> a) Within 30 days of the Effective Date. b) 30 days prior to operations.
10	<p>The PE will be required to provide training to the Project Company Directors on their roles and responsibilities, Project Company management and functions,</p>	<p>Submit to MIGA:</p> <ul style="list-style-type: none"> a) Submit to MIGA training records and records of attendance. 	<ul style="list-style-type: none"> a) Within 30 days of the Effective Date.
11	<p>The PE will develop an ESIA addendum reflecting the Project design changes and proposed mitigation measures designed to avoid further Project impacts.</p>	<p>Submit to MIGA ESIA addendum, including amended transmission line route.</p>	<p>Prior to MIGA Contract of Guarantee (CoG) signing</p>
<i>PS2 Labor and Working Conditions</i>			
12.	<p>The sub-EPC will appoint a Human Resources (HR) coordinator and Industrial Relations (IR) officer</p>	<p>Submit to MIGA the HR Coordinator and IR Officer appointment letters and CVs</p>	<p>Prior to MIGA Contract of Guarantee (CoG) signing.</p>
13.	<p>The PE will update the Project HR Manual for construction and operations in line with MIGA PS2.</p>	<p>Submit to MIGA the Project HR Manual</p>	<p>Within 30 days of the Effective Date.</p>
14	<p>The PE will conduct an internal and external labor audit (including contractors labor management system) monitoring plan and a detailed schedule.</p>	<p>Monitoring plan and schedule</p>	<p>Within 30 days of the Effective Date</p>
15.	<p>The PE will develop and submit the GBVH Plan and separate GBVH Procedure to MIGA for review.</p>	<p>Submit to MIGA:</p> <ul style="list-style-type: none"> a) GBVH Plan b) GBVH Procedure 	<ul style="list-style-type: none"> a) Within 30 days of the Effective Date

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	The PE will incorporate Gender Based Violence and Harassment (GBVH) aspects into the internal and external Grievance Mechanisms, the Worker Code of Conduct and the HR Manual and provide GBVH awareness training for all staff in line with national laws and MIGA PS 2.	<ul style="list-style-type: none"> c) Worker Code of Conduct d) HR Manual e) GBVH Awareness Training 	<ul style="list-style-type: none"> b) Within 30 days of the Effective Date c) Within 30 days of the Effective Date d) Within 30 days of the Effective Date e) Within 30 days of the Effective Date
16.	The PE will develop HSSE Specification documents which will contain procedures for site-specific OHS risk assessment including the hazard and risk identification process, emergency response, first aid, working at heights and hazardous materials, etc. in line with MIGA PS2.	Submit to MIGA HSSE Specification documents and associated OHS risk assessment	Within 30 days of the Effective Date
17.	The PE will develop a COVID -19 Management Plan to addresses the risks and impacts of COVID-19 to workers and communities in line with MIGA PS 1, 2 and 4. <ul style="list-style-type: none"> a) COVID-19 plans for Construction b) COVID -19 plans for Operations 	Submit to MIGA COVID -19 policies and procedures <ul style="list-style-type: none"> a) COVID-19 plans for Construction b) COVID -19 plans for Operations 	<ul style="list-style-type: none"> a) Prior to MIGA Contract of Guarantee (CoG) signing b) 3 months prior to Operations.
18.	The PE will develop an external Grievance Mechanism for Employees to provide employees of the PE and/ or its contractors with a clear process through which to raise issues, concerns, or complaints (anonymous if requested)	Submit to MIGA the external Worker Grievance Mechanism procedure	Within 30 days of the Effective Date
<i>PS3 Resource Efficiency and Pollution Prevention</i>			
19.	The PE will require under the Water Management Plan that the EPC Contractor to install a water monitoring meter on the borehole to ensure sustainable extraction and use of water in line with MIGA PS3 requirements and Lesotho laws.	Submit to MIGA photographic evidence of water meter installed.	Within 30 days of the Effective Date
20.	The PE will require the EPC contractor to design the project toilets in coordination with the wetland specialist to ensure that there is no	Submit to MIGA:	

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	sewage spillage and seepage into the wetland in line with MIGA PS3. This will be included as part of the Project E&S monitoring, inspection, and reporting.	<ul style="list-style-type: none"> a) Design plans for toilets and septic tanks b) E&S construction monitoring reports. 	<ul style="list-style-type: none"> a) Within 30 days of the Effective Date b) Ongoing
<i>PS4 Community Health, Safety and Security</i>			
21.	The PE will incorporate community health, safety and security risks into ESMS and related ESMPs in line with the requirements of MIGA PS1 and PS4 and Lesotho national regulations, for a) construction phase, and b) operations phase, which entails at a minimum: (a) Developing an Influx Management Plan to address the risks associated with the potential influx of migrant workers (b) Developing a Construction Traffic Management Plan (c) Incorporating GBVH risks and mitigating measures into the Security Management Plan	Submit to MIGA: (a) Influx Management Plan (b) Transport Safety Plan (c) Security Management Plan	<ul style="list-style-type: none"> a) Within 30 days of the Effective Date b) Within 30 days of the Effective Date c) Within 30 days of the Effective Date
22.	The PE will develop and submit the GBVH Plan and separate GBVH Procedure to MIGA for review. The PE will engage and partner with a local, qualified NGO in the implementation of all community-related activities in the GBVH Plan and Procedure including the grievance mechanism.	Submit to MIGA: (a) GBVH Plan and GBVH Action Plan (b) Contract with local NGO	<ul style="list-style-type: none"> a) Within 30 days of the Effective Date b) Within 30 days of the Effective Date
<i>PS5 Land Acquisition and Involuntary Resettlement</i>			
23.	The PE will be required to conduct the valuation process and compensate the 2 landowners adjacent to the transmission line for any assets on individual plots (including crops) as a servitude right in line with MIGA PS5.	Submit to MIGA: (a) the valuation documentation (b) payment documentation/record as evidence of disbursement.	<ul style="list-style-type: none"> a) One month prior to construction b) Prior to construction
<i>PS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</i>			
24.	The PE will engage an on-site wetland specialist to oversee all construction of infrastructure within the wetland areas and wetland rehabilitation efforts for the construction and initial operation phase (period of 9 months) in line with MIGA PS6 requirements. This includes monthly site audits for the duration of the construction phase (scheduled 8 month period), as well as three post wetland construction	Submit to MIGA: (a) Wetland specialist CVs and appointment letter. (b) Pre-construction site assessment report, findings, recommendations and action plan.	<ul style="list-style-type: none"> a) Prior to MIGA Contract of Guarantee (CoG) signing

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	inspections. The post construction audits must be undertaken at a 3-month interval, over a 9 month period, and shall include two summer audits, including an audit at the end of the first rainy season after the completion of construction, and provide reports on the status of the wetlands. The specialist will also conduct a pre-construction site assessment will be undertaken to reassess the EIS and PES for all wetland units in which wetland construction and rehabilitation actions are to be undertaken, in order to determine a pre-construction baseline, and to reassess and finalize the metrics of loss and gain as per the identified rehabilitation sites (onsite and adjacent thereto) in line with the final detailed design, the actions needed and implementation timetable.	c) Wetland Monitoring reports d) Post-construction audit reports	b) Within 30 days of the Effective Date c) Quarterly d) 30 days after audit
25.	The PE will develop a bird monitoring program and apply bird deterrent devices to the panel structures to minimize birds' collision.	Submit to MIGA Bird monitoring program	Within 30 days of the Effective Date
26.	The PE will require the EPC contractor to develop an Invasive Alien Species Management Plan that will detail management and control of exotic and invasive alien species for the construction and operation phase in line with MIGA PS6.	Submit to MIGA Invasive Alien Species Management Plan	Within 30 days of the Effective Date
27.	The PE will assess and ensure that the quarries and material sites for the Project are licensed in line with Lesotho national laws and requirements and these sites will not impact Natural Habitat and Modified Habitat in line with PS 6 requirements.	Submit to MIGA: a) The assessment and screening report for the quarries and material sites b) The copies of permits/licenses for the material sites	a) Within 30 days of the Effective Date b) Within 30 days of the Effective Date
<i>PS8 Cultural Heritage</i>			
28.	As per the ESMP, the PE will require the EPC to implement the mitigating measures for the site of high significance within the transmission line wayleave in line with MIGA PS8.	Submit to MIGA evidence of cultural heritage mitigating measures or permit	Prior to construction
29.	As per the ESMP, the PE will require the EPC to fence off burial site during construction and post construction, if the family relatives of the deceased wish, remove the fence around the burial site in line with MIGA PS8.	Submit to MIGA: a) Evidence of fencing surrounding burial site	a) Prior to construction b) Post construction

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		b) Evidence of engagement on burial site	