

Environmental and Social Action Plan

#	Task Title and Description	Anticipated Completion Date
Performance Standard 1 – Assessment and Management of Environmental and Social Risks and Impacts		
1	<p>The Project Enterprise shall develop a Project-specific Environmental and Social Management System (ESMS) for (a) construction and (b) operations that conforms with Egyptian Legislation and MIGA’s Performance Standards (PS). The ESMS shall include as minimum the following items: (i) Environmental and Social (E&S) Policy and Health and Safety (H&S) Policy, (ii) identification of the risks and impacts, (iii) management programs and plans, (iv) organizational capacity, responsibilities and competence, and (v) monitoring and review.</p> <p>Where relevant, the ESMS shall incorporate elements of the Facilities Management Company (FMC) Environmental and Social Health and Safety Management System (ESHS MS) developed by the FMC and specifying how both interact.</p>	<p>a) [30] days prior to the start of construction but no later than [45] days after effective date of Contract of Guarantee (CoG) or whichever comes sooner</p> <p>b) [30] days prior to the start of operations</p>
2	<p>The Project Enterprise shall develop a uniform project ESMP for (a) construction and (b) operations in line with MIGA’s PS and that takes into account the Strategic Environmental and Social Assessment (SESA) and the FMC’s ESHS management plan</p> <p>The ESMP shall include project specific environmental and social management plans and procedures to meet the objectives of the PSs. As a minimum, these shall include: (1) Emergency preparedness and response plan; (2) community grievance mechanism; (3) stakeholder engagement plan (4) training plan for employees and contractors; (5) chance finds procedure; (6) waste management plan (7) monitoring plan; (8) reporting and tracking of non-compliances; (9) contractor management.</p>	<p>a) [30] days prior to the start of construction but no later than [45] days after effective date of CoG</p> <p>b) [30] days prior to the start of operations</p>
3	<p>The Project Enterprise shall cause the EPC contractor to (a) to develop a health, safety and environment management plan (HSEMP) and construction environment management plan (CEMP) in compliance with MIGA’s PS and WBG EHS guidelines and aligned with the FMC’s ESHS MS when this is developed to manage relevant, cumulative, and common impacts of projects in the Benban solar complex; (b) train the workers on the HSEMP/CEMP requirements.</p>	<p>a) [30] days prior to the start of construction but no later than [45] days after effective date of CoG or whichever comes sooner</p> <p>b) [15] days prior to the start of construction</p>

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4	<p>The Project Enterprise shall:</p> <ul style="list-style-type: none"> a) Appoint a qualified Health, Safety, and Environmental (HSE) Manager to follow both the construction and operations phase of the project. The HSE manager will ensure all contractors adhere to environmental, and health and safety protocols and ESMS. In addition, there will be at least one on-site EHS officer for the construction phase and one off-site EHS officer during operation. These will be supported by additional EHS staff as required to manage the risks identified. b) Appoint a qualified Human Resources manager to follow both the construction and operations phase of the project to manage labor and working conditions in line with PS2 requirements. c) Provide a description of project organizational structure for the implementation of all E&S and labor requirements. 	<ul style="list-style-type: none"> a) Within 30 days of Effective Date of CoG or whichever comes sooner b) Within 30 days of Effective Date of CoG or whichever comes sooner c) Within 30 days of Effective Date of CoG or whichever comes sooner
Performance Standard 2 – Labor and Working Conditions		
5	<p>The Project Enterprise shall cause:</p> <ul style="list-style-type: none"> a) the EPC contractor to develop HR policy and procedures in line with MIGA’s PS 2 and Egyptian labor law and that these are applied to the sub-contractors b) the O&M contractor to develop HR policy and procedures in line with MIGA’s PS 2 and Egyptian labor law specific to the project. <p>The HR policy and procedures shall demonstrate compliance with MIGA’s requirements on: working conditions and terms of employment; worker’s organization; non-discrimination and equal opportunity; grievance mechanism; child and forced labor.</p> <ul style="list-style-type: none"> c) EPC and O&M contractor to disseminate and train workers on HR policy and procedures 	<ul style="list-style-type: none"> a) [30] days prior to the start of construction but no later than [45] days after effective date of CoG or whichever comes sooner b) [60] days prior to the start of operations but no later than [30] days after effective date of CoG or whichever comes sooner c) Within 15 days prior to the start of construction and operations
6	<p>The Project Enterprise shall provide overall strategy for worker accommodation and clarify the entity (FMC or the developer) responsible for providing and managing accommodation and ensure that the workers’ accommodation complies with IFC/ EBRD Workers’ accommodation: process and standards.</p>	<p>[30] days prior to the start of construction but no later than [60] days after effective date of CoG or whichever comes sooner</p>
7	<p>The Project Enterprise shall:</p>	<ul style="list-style-type: none"> a) [30] days prior to the start of construction but no later than [45] days

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	<p>a) Ensure that the EPC contractor develops occupational health and safety procedures for construction activities including but not limited to: (i) hazard identification and assessment; (ii) construction site safety (barricades, safety nets, control of access, clear demarcation of areas and provision of safety information to visitors); (iii) specific procedures for hazardous work; (iv) worker’s safety and training plan; (v) personal protective equipment needs; (vi) heat stress prevention; (vii) site supervision and audit procedures; (viii) incident intervention measures and (ix) reporting.</p> <p>b) develop an operations occupational health and safety procedure.</p>	<p>after effective date of CoG or whichever comes sooner</p> <p>b) [60] days prior to the start of operations but no later than [30] days after effective date of CoG or whichever comes sooner</p>
8	The Project Enterprise shall ensure that MIGA’s PS requirements are incorporated in third party contractual agreements.	For existing contractors (where contracts are finalized / executed), within [30] days of effective date of CoG. For future, new contractors, within 30 days of the contract being executed.
9	<p>The Project Enterprise shall:</p> <p>a) conduct a supply chain assessment of the nominated primary PV supplier to identify key E&S risks/impacts and ensure the supplier complies with the principles of MIGA’s PS to appropriately manage these risks.</p> <p>b) include MIGA PS requirements for supply chain (child and forced labor, occupational health and safety) within supplier contracts</p>	<p>a) For existing suppliers within [30] days of effective date of CoG. For future, suppliers to be included in the procurement assessment process.</p> <p>b) Within [30] days of effective date of CoG</p>
Performance Standard 3 – Resource Efficiency and Pollution Prevention		
10	The Project Enterprise shall cause the EPC and O&M contractor to develop a water management plan which includes: (i) water requirements for each stage of the project, (ii) information on water sources available, (iii) water use estimation method consistently applied across plots, (iv) treatment requirements (if any)	<p>a) [30] days prior to the start of construction but no later than [45] days after effective date of CoG or whichever comes sooner</p> <p>b) [60] days prior to the start of operations</p>
11	The Project Enterprise shall cause the EPC and O&M contractor to develop management plans and/or procedures manage pollution related aspects of the project in line with the	a) [30] days prior to the start of construction but no later than [45] days

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	WBG's EHS Guidelines including: dust, air quality, management of waste, hazardous materials, spills, occupational noise.	<p>after effective date of CoG or whichever comes sooner</p> <p>b) [60] days prior to the start of operations</p>
Performance Standard 4 – Community Health Safety and Security		
12	The Project Enterprise shall cause the EPC and O&M contractor to develop a traffic management plan for construction and operations respectively. The traffic management plan will be aligned with FMC's overarching traffic management plan and will include details on how it will address the risk of accidents and communities along the roads. The plan shall include requirements for appropriate signage, speed limits, any timing restrictions on movements i.e. night-time and, if applicable, requirements to use escorts.	<p>a) [30] days prior to the start of construction but no later than [45] days after effective date of CoG or whichever comes sooner</p> <p>b) [30] days prior to the start of operations</p>
13	The Project Enterprise shall develop a security risk assessment and a security management plan which captures the key elements of PS4. The Project Enterprise shall ensure that the security risk assessment and security management plan is adapted by the EPC/O&M contractor and aligned with the FMC's security management plan.	<p>a) [60] days prior to the start of construction but no later than [45] days after effective date of CoG or whichever comes sooner</p> <p>b) [30] days prior to the start of operations</p>
14	The Project Enterprise shall cause the EPC and O&M contractor to develop and implement a worker's code of conduct which will also apply to all sub-contractors to ensure they maintain high standards within the community	<p>a) [30] days prior to the start of construction but no later than [45] days after effective date of CoG or whichever comes sooner</p> <p>b) [60] days prior to the start of operations but no later than [30] days after effective date of CoG or whichever comes sooner</p>