50MW Photovoltaic Power Plant
Risha, Jordan

Volume 3 – Environmental and Social Impact Assessment Framework Environmental & Social Management and Monitoring Plan

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CONTENTS

1 INTRODUCTION 4

1.1 Development of a CESMP 4

1.2 Development of an OESMP 5

1.3 Identification of ESMS Scope 5

1.4 General Approach to the Development of ESMS 5

2 ENVIRONMENTAL AND SOCIAL POLICY 7

3 IDENTIFICATION OF REQUIREMENTS FROM ESIA 8

4 IDENTIFICATION OF REQUIREMENTS FROM THE STATUTORY AUTHORITY 8

5 IDENTIFICATION OF REQUIREMENTS FROM THE PROJECT LENDERS 9

6 IDENTIFICATION OF LEGAL AND OTHER REQUIREMENTS 9

7 IDENTIFICATION OF PERMIT REQUIREMENTS 10

8 IDENTIFICATION OF RISKS AND IMPACTS 10

9 COMPLIMENTARY PLANS AND PROCEDURES 11

10 ORGANISATIONAL CAPACITY AND COMPETENCY 12

10.1 Roles and Responsibilities 12

10.2 Environmental & Social Awareness and Training 13

10.3 Induction and Orientation 13

10.4 Toolbox Talks 14

11 MITIGATION AND MANAGEMENT MEASURES 14

12 MONITORING 15

12.1 Monitoring Requirements from ESIA 15

13 MANAGEMENT OF DATA 16

14 RECORDS 17

15 AUDIT PROGRAMME 17

16 EMERGENCY PREPAREDNESS AND RESPONSE 18

17 NONCONFORMITY, CORRECTIVE ACTION AND PREVENTATIVE ACTION 19

18 STAKEHOLDER ENGAGEMENT 20

19 COMMUNICATION 21

20 GRIEVANCE MECHANISM 21

20.1 Internal Grievances 21

20.2 External Grievances 22

21 ESMS REVIEW 22

LIST OF ABBREVIATIONS

Abbreviation	Meaning
BAT	Best Available Techniques
BMP	Best Management Practice
BOOT	Build, Own, Operate and Transfer
CESMP	Construction Environmental Social Management Plan
ESMP	Environmental and Social Management Plan
EMS	Environmental and Social Management System
EPs	Equator Principles
EPC	Engineering, Procurement and Construction
EPFIs	The Equator Principle Financial Institutions
IFC	International Finance Corporation
MSDS	Material Safety Data Sheet
OESMP	Operational Environmental and Social Management Plan
O&M	Operation and Maintenance
ESIA	Environmental and Social Impact Assessment
VOC	Volatile Organic Compounds
WHO	World Health Organisation
WWTP	Wastewater Treatment Plant
5 Capitals	5 Capitals Environmental and Management Consulting

1 INTRODUCTION

This document is Volume 3 of the ESIA and provides a Framework for the development of the Environmental and Social Management System (ESMS) for the construction and operational phases of the 50MW (61.3MWp) Photovoltaic (PV) Power Plant (the "Project"). The framework has been developed to ensure that all associated Environmental and Social Impacts associated with both the construction and operational phases of the project are appropriately identified and controlled through the development of a robust construction and operational phase ESMS.

Both the construction and operational phase ESMS should need to incorporate requirements established within Volume 2 of the ESIA as well as any and all future requirements defined by the Jordanian Ministry of Environment (MoEnv) and international lenders who will provide project financing such as the European Bank for Reconstruction and Development (EBRD). It is recognised that The International Finance Corporation (IFC) is a shareholder in ACWA Power and as such, this ESIA has also been prepared with consistency to IFC environmental and social requirements.

1.1 Development of a CESMP

The Construction Environmental Management Plan (CESMP) is the overarching, principal document that identifies scope, objectives, risks, responsibilities, desired outcomes and associated monitoring requirements of the ESMS associated with the construction phase of the project.

The construction phase ESMS is likely to have plans, documents, data, forms, records etc. affiliated with the construction phase of the project that are supplementary to, and should be defined by the CESMP.

The CESMP should be developed and implemented by the principal contractor for the project and should cover all potential environmental and social impacts associated with the projects construction phase (including potential impacts from subcontractors and the supply chain that can be influenced by the principal contractor).

The CESMP should be prepared, reviewed and where necessary approved by the Ministry of Environment and Project Lenders in advance of the commencement of construction.

1.2 Development of an OESMP

The Operational Environmental Management Plan (OESMP) is the overarching, principal document that identifies scope, objectives, risks, responsibilities, desired outcomes and associated monitoring requirements of the Environmental and Social Management System (ESMS) associated with the operational phase of the project.

The operation phase ESMS is likely to have plans, documents, data, forms, records etc. affiliated with the operational phase of the project that are supplementary to, and should be defined by, the OESMP.

The OESMP should be developed and implemented by the Operations and Maintenance Company for the project and should cover all potential environmental and social impacts associated with the projects operational phase (including potential impacts from subcontractors and the supply chain that can be influenced by the Operations and Maintenance Company).

The OESMP should be prepared, reviewed and where necessary approved by the Ministry of Environment and Project Lenders in advance of the commencement of operation.

1.3 Identification of ESMS Scope

Both the CESMP and OEMSP should outline scope of the associated ESMS including:

- Applicable activities and timescales for construction/operation;
- Organisational units and functions;
- Boundaries of the ESMS (e.g. this will include the project site and may include associated facilities, or other storage areas, warehouses etc.)
- Authority and ability to exercise control and influence.

1.4 General Approach to the Development of ESMS

Effective management of environmental & social issues should include the following fundamental components as part of a robust ESMS:

- Identifying environmental aspects/risks and potential impacts as early as possible for construction and operation phase planning, including the incorporation of environmental and social considerations into staffing requirements, process plans, programming, work orders, required authorisations, and site layout.
- Involving environmental professionals, who have the experience, competence, and training necessary to assess and manage environmental impacts and risks, and carry out specialised environmental management functions including the preparation of

project or activity specific plans and procedures that incorporate the technical requirements presented in this document.

- Prioritising management strategies with the objective of achieving an overall reduction of risk to human wellbeing and the environment, focusing on the prevention of irreversible and / or significant impacts.
- Favouring strategies that eliminate the cause of the impact at its source, for example, by selecting less hazardous materials or processes that avoid the need for environmental controls.
- When impact avoidance is not feasible, incorporating controls to reduce or minimise the possibility and magnitude of undesired consequences, for example, with the application of pollution controls to reduce the levels of emitted contaminants.
- Preparing workers, nearby communities and relevant stakeholders to respond to emergencies, accidents, including providing technical and financial resources to effectively and safely control such events, and restoring workplace and community environments.
- Improving Environmental performance through a combination of ongoing monitoring of facility performance and effective accountability.

The ESMS should evolve and adapt over time to meet the needs of the project and ensure material issues for the site are appropriately reflected and targeted.

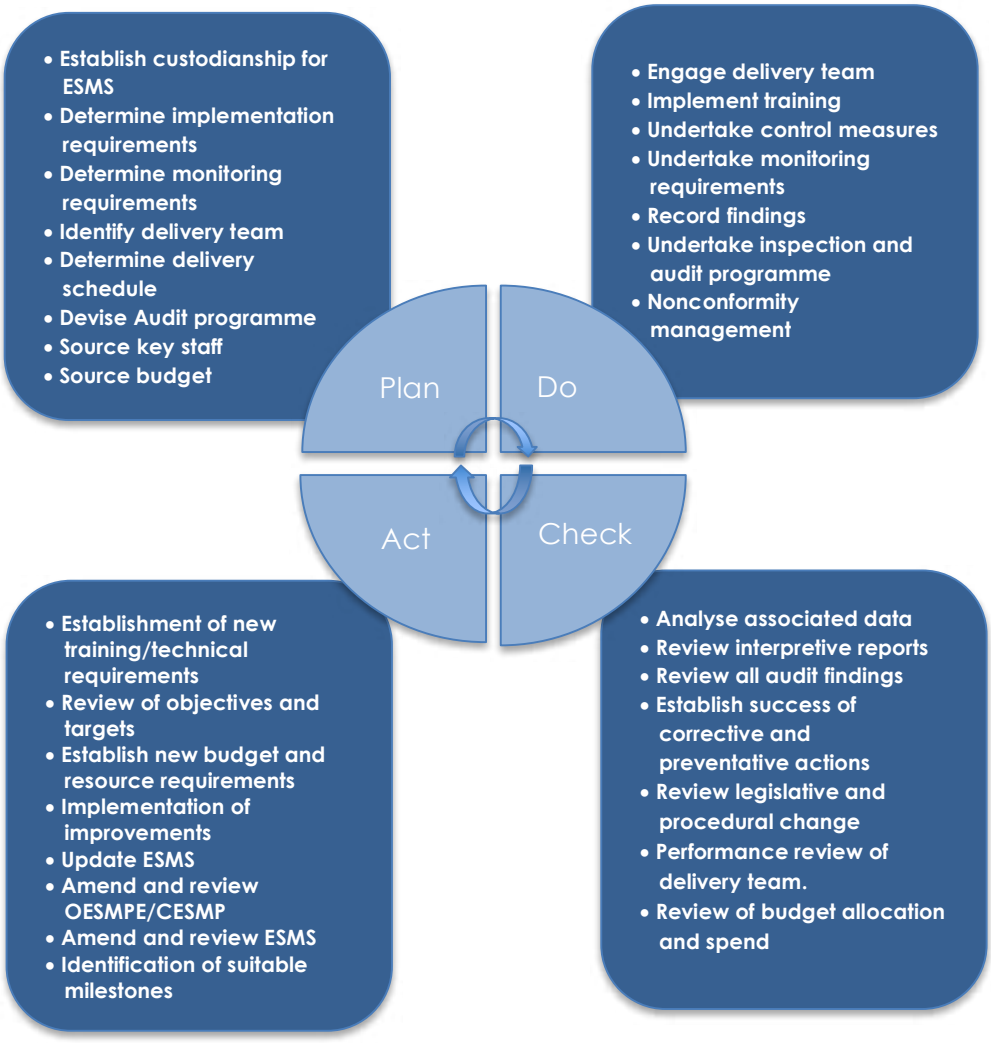
Initial implementation should focus on setting and reviewing requirements of the ESMS, determining custodianship within the project team, identifying budget source, establishing target ranges for performance and establishing appropriate data gathering techniques and controls.

Performance ranges should be refined on a regular basis as more data becomes available, in turn enabling more accurate strategy development and benchmarking.

It is important that the CESMP, OEMSP and associated plans and procedures are treated as live documents, to be updated and refined within a continuous process of improvement.

A proposed implementation process for ESMS is illustrated in the figure below.

Figure 1-1 Implementation Process



2 ENVIRONMENTAL AND SOCIAL POLICY

The construction and operational phases of the project should each have a clear statement that defines what is the policy with regards to Environmental and Social issues. This policy document should:

- Be appropriate to the context of the project, including the nature, scale and impacts as defined from the ESIA.
- Provide a suitable framework for establishing appropriate environmental and social objectives.

- Include a commitment to the protection of the environment, including prevention of pollution and requirements established by the ESIA process.
- Include a commitment to the fair and just treatment of all staff, as well as including a commitment to:
    - The provision of a safe and healthy workplace environment;
    - Fair and just remuneration in accordance with employment law and agreed contracts; and
    - Vehemently condemn and ensure against forced or compulsory labour, child labour or discrimination.
- Be in all appropriate languages to be able to be understood by all personnel and visitors.
- Include a commitment to fulfil all Environmental and Social compliance obligations.
- Include a commitment to continual improvement of the Environment and Social Management System.

During the construction and operation phases, the policy should be established and signed by top management and should be made available to all staff, contractors and sub-contractors.

3 IDENTIFICATION OF REQUIREMENTS FROM ESIA

Volume 2 of this ESIA has identified numerous project and/or site specific mitigation measures that must be incorporated into the construction and operational phases of the project.

During the development of the CESMP all mitigation (and any enhancement measures) relevant to the construction phase of the project should be identified from Volume 2 and the method of compliance with these mitigation measures detailed within the CESMP.

During the development of the OESMP all mitigation (and any enhancement measures) relevant to the operational phase of the project should be identified from Volume 2 and the method of compliance with these mitigation measures detailed within the OESMP.

4 IDENTIFICATION OF REQUIREMENTS FROM THE STATUTORY AUTHORITY

In response to this ESIA, the statutory environmental authority, The Ministry of Environment of Jordan, should grant Environmental Approval for project commencement. This Environmental Approval is likely to incorporate conditions which must be met by the project to maintain

validity of the Environmental Approval (please note that non-adherence to Ministry of Environments' conditions is likely to result in breach of legislation).

During the development of the CESMP, the environmental approval for the project must be reviewed to ensure that all construction related conditions established by the Ministry of Environment are met during the construction phase of the project.

The environmental approval for the project should be included as an appendix to the CESMP and/or maintained onsite during construction.

During the development of the OESMP, the environmental approval for the project must be reviewed to ensure that all operational related conditions established by the Ministry of Environment are met during the construction phase of the project.

The environmental approval for the project should be included as an appendix to the OESMP and/or maintained onsite during operation.

5 IDENTIFICATION OF REQUIREMENTS FROM THE PROJECT LENDERS

In response to this ESIA, international financial institutions lending finance to the project will establish an Action Plan that identifies Environmental and Social requirements for the project commensurate with or supplementary to the ESIA. Requirements of the action plan should have been established as a as a condition to the project loan. Failure to comply with the Action Plan can result in financial disbursements being delayed or even withheld.

During the development of the CESMP and wider construction phase ESMS, the lenders action plan for the project must be reviewed to ensure that all construction related conditions established by the project lenders are met during the construction phase of the project.

During the development of the OESMP and wider operational phase ESMS, the lenders action plan for the project must be reviewed to ensure that all construction related conditions established by the project lenders are met during the operational phase of the project.

6 IDENTIFICATION OF LEGAL AND OTHER REQUIREMENTS

During the development of the CESMP and OESMP, the requirements associated with the following should be identified and documented:

- Local legislation.
- National legislation.
- International Treaties and Conventions.
- European Bank for Reconstruction and Development (EBRD).
- The International Finance Corporation (IFC).
- Client/Contractual requirements.
- Stakeholder requirements.

7 IDENTIFICATION OF PERMIT REQUIREMENTS

Statuary Authorities and/or applicable legislation is likely to warrant the requirement for task/activity related permits or no objection certificates (NOC). During the development of the CESMP and OESMP, the requirements for permit/NOC applications should be identified according to the associated required activity, for example:

- Collection of sewerage from site.
- Generation, storage and disposal of controlled or hazardous wastes.
- Procurement, storage or use of a controlled or hazardous material.
- Establishment of a site worker compound.

8 IDENTIFICATION OF RISKS AND IMPACTS

One of the principal stages in the development of the project's CESMP and OESMP should be the development of project aspects/risks and associated environmental or social impacts associated with the relevant phase of the project.

Once aspects and associated risks have been identified and documented (i.e. specifically in accordance with the required construction methods statements or operational activities), associated controls should be developed that are commensurate to the level of anticipated severity, likelihood and any statutory or lender requirements.

When identifying the aspects/risks and associated environmental or social impacts the following should be taken into account:

- Change, including planned or new development and or new/modified activities.
- Abnormal conditions and reasonably foreseeable emergency situations.
- Project timescales and potential impacts associated with seasonality.

- Stakeholder perception.
- Compliance obligations.
- Risks inherent in the supply chain in addition to those on-site.
- Consider linkages with the projects Health and Safety Management System.

The identification of aspects/risks and impacts should be documented, linked to associated proposed controls and updated as and when project or environmental & social circumstances change.

9 Complimentary Plans And Procedures

The CESMP and OESMP should clearly define all associated plans and procedures that are used to define and control potential adverse environmental and social risks. The requirement for such plans should be dependent on the potential for environmental and social impacts for the project as identified during the preparation of the CESMP and OEMSP.

The following table provides a list of examples plans and procedures that may be considered/required.

Figure 9-1 Example Complimentary Plans and Procedures

Plan / Procedure	Purpose
Waste Management Plan	Identify site specific requirements for waste containment, transport and disposal.
Pollution Prevention and Response Plan	Identify site specific requirements for the prevention of pollution and how to manage pollution incidents. Should include the identification of high risk areas on a plan and the location of spill kits. Should also identify required contact details in the event of an incident and contractors that are available on a quick response contract to assist with clean up.
Grievance Procedure	Should identify the procedure for all site staff to be able to raise issues, concerns and opportunities for improvement for any aspect of their employment on the project.
Site Inspection & Audit Plan & Procedure	To specify the timing and frequency of inspections and audits (including external independent audits for the lenders). To detail the methodology of such inspections and audits to ensure Environmental and Social Issues are adequately covered.

10 Organisational Capacity and Competency

10.1 Roles and Responsibilities

In order to ensure application of the ESMS and to achieve the required outcomes of the CESMP/OESMP, senior management for the project will need to:

- Ensure that resources needed for the implementation of the ESMS are available (human and financial resources).
- Communicate the importance of effective environmental & social management for all those involved in the day to day management of the Project.
- Direct and support employees to contribute towards the effectiveness of the plan.
- Ensure appropriate lines of communication on environmental and social issues, including providing of any required data to statutory bodies and lenders.
- Ensure regular updates to the ESMS are undertaken to ensure that it remains appropriate to the purpose and context of the project, and that any change of direct and indirect impacts are identified and managed accordingly.

Key roles and responsibilities of principal parties likely to be involved in the implementation of the ESMS during construction and/or Operation include (but are not restricted to) the following:

- The Ministry of Environment
- Corporate (Head Office) Management Representatives
- Regional or Department Heads for Environmental and Social Issues
- Project Director
- Environmental Manager
- Environmental Co-ordinators
- Community Liaison Officer
- Site Managers / Foremen / Supervisors
- Sub-Contractors
- Suppliers
- Site staff
- Stakeholders
- Department of Antiquities

- RSCN
- CEGCO Accommodation Residents
- Mafraq Governorate

The CESMP and OESMP should need to appropriately define the involvement of each of these key parties (and others) in the development and implementation of the ESMS.

10.2 Environmental & Social Awareness and Training

In order for environmental and social control measures to be effective, staff will need to be aware of specific responsibilities and required actions associated with their element of work.

Tailored training requirements relevant to elements of works will need to be developed and defined as part of the ESMS (i.e. site personnel associated with waste management should require training on relevant components of the waste management plan).

For a training programme to be successful, it is vital to:

- Select a trainer with appropriate knowledge, skills and experience (often peer-level training is effective);
- Make training specific to the audience;
- Ensure training is engaging and relevant; and
- Follow up and refresh training to keep abreast of changes in site conditions.

In order to record identified training needs, training type and frequency required for each staff role, commensurate with the requirements of the ESMS, should be identified. Records of associated training should be held to include the following.

- Description of training.
- Purpose of training.
- Date.
- Location.
- Attendee.
- Trainer.

10.3 Induction and Orientation

The CESMP and OEMSP should identify the necessary Environmental and Social requirements to be covered by site induction. This is likely to include:

- Raising awareness for any significant potential impacts associated with the project.

- Any partially valuable resources or protection measures that need to considered by all staff.
- The proximity or sensitivity of nearby residents and communities to the project.
- Internal grievance procedures and allowances for worker welfare.

10.4 Toolbox Talks

Toolbox talks are a useful way of providing on-site training to disseminate good practice and provide regular reminders on induction and training content. It is recommended that toolbox talks are held regularly for site personnel and supervisory staff.

Required toolbox talks topics and frequencies should be identified within associated risk assessments, method statements plan or procedures.

11 MITIGATION AND MANAGEMENT MEASURES

Construction phase requirements from the ESIA and how they are to be implemented must be detailed within the CESMP for the project.

Volume 2 of the ESIA identifies these and the associated mitigation and management requirements for the project and should be referred to when developing the projects CESMP. The Main Construction phase requirements from volume 2 are listed below (please refer to volume 2 for full details).

- Waste Management
- Adequate Spill Response Procedure
- Implementation of Archaeology and Heritage Change Find Procedure

Operational phase requirements from the ESIA and how they are to be implemented must be detailed within the OESMP for the project.

Volume 2 of the ESIA identifies these and the associated mitigation and management requirements for the project and should be referred to when developing the projects OESMP. Operational phase requirements from volume 2 are listed below (please refer to volume 2 for full details).

- Waste Management

In addition to the above, the following chapter defines common best practice measures and standard controls commensurate with common potential environmental and social impacts for similar projects. These controls should be considered during development of the CESMP and OESMP.

12 MONITORING

The CESMP and OESMP should determine:

- What parameters needs to be monitored and measured and at what locations.
- The methods for monitoring measurement, analysis and evaluation to ensure valid results.
- The criteria against which compliance and performance should be measured.
- When and at what frequency monitoring needs to be performed.
- How the results from monitoring and measurement should be analysed and evaluated (independent or internal).

12.1 Monitoring Requirements from ESIA

A suitable monitoring regime should be established to ensure that:

- The timing of monitoring and measurement is coordinated with the need for analysis and evaluation of results.
- The results of monitoring and measurement are reliable, reproducible and traceable.
- The analysis and evaluation are reliable and reproducible and enable the project to report trends.

Construction phase monitoring requirements from the ESIA and how there are to be implemented must be detailed within the CESMP for the project.

Volume 2 of the ESIA identifies these and the associated monitoring requirements for the project and should be referred to when developing the projects CESMP. Construction phase requirements from volume 2 are listed below (please refer to volume 2 for full details).

- Waste Management
- Adequate Spill Response Procedure
- Implementation of Archaeology and Heritage Change Find Procedure

Operational phase monitoring requirements from the ESIA and how there are to be implemented must be detailed within the OESMP for the project.

Volume 2 of the ESIA identifies these and the associated monitoring requirements for the project and should be referred to when developing the projects OESMP. Operational phase requirements from volume 2 are listed below (please refer to volume 2 for full details).

- Waste Management

In addition to the above, the remainder of this chapter defines common best practice measures and standard monitoring efforts commensurate with common potential environmental and social impacts for similar projects. These controls should be considered during development of the CESMP and OESMP.

13 MANAGEMENT OF DATA

Monitoring results should be compared against relevant standards, permit requirements, required thresholds, received complaints, audit findings, pintail impacts, CESMP and OESMP requirements. The Environmental Manager should define appropriate action to follow in the instance that any exceedances in monitoring limits are confirmed or adverse impacts identified, including:

- Communication protocol in the event that an exceedance is identified.
- Internal review process of recently performed maintenance and inspection.
- Review of previous monitoring data to identify any potential associated variations or trends in results.
- Recommendations for quarantine of equipment or change in work practices.
- Review of monitoring frequency to ensure issue does not reoccur.

The Environmental Manager should also keep a record of any communications received regarding environmental condition and thoroughly investigate any grievances; as per the grievance procedure.

The repetition of measurements is an essential part of monitoring as it detects changes over time and should alert to potentially positive or negative effects of an activity. Adverse effects should trigger a review of mitigation measures and determination of the likely source of the impact. Should no effect be detected it may demonstrate a lack of effect, success of mitigation measures or the requirement to continue monitoring over a longer period of time.

The Environmental Manger should use the data from monitoring for comparison against baseline and all previous monitoring efforts to identify trends in condition and make inferences on the success of implemented mitigation measures.

Data and associated interpretation should be recorded in a report format suitable for submittal to the lenders and Statutory Authorities (should submittal of monitoring data be required) making clear any adverse impacts identified and how mitigation measures have been adjusted to compensate.

14 RECORDS

The appropriate management of records is a requirement of any successful ESMS and can be used to track progress, review effectiveness and demonstrate compliance.

The ESMS relevant to both the construction and operation phases should include for the collation of the records including (but not limited to) the following:

- Environmental and Social induction and training records.
- Relevant records of competence/qualifications.
- Accident Investigation Reports.
- Grievance register.
- Internal Audits reports (including close-out).
- Non-Conformance Reports.
- Environmental Inspections Reports (including close-out).
- Waste Manifest Forms.
- Environmental Risk Assessments and Method statements.
- Equipment Inspections/Certifications.
- Independent Audit Reports for Lenders (including close-out).

15 AUDIT PROGRAMME

Auditing is an integral requirement of any monitoring strategy and should be considered as a continual process to be undertaken by a range of site staff to ensure the successful implementation of mitigation/management measures.

The ESMS should establish, implement and maintain an integral audit programme that identifies the frequency, methods, responsibilities, planning requirements and reporting of audits and inspections.

When establishing an audit and inspection programme, the organisation should consider the potential frequency and significance of environmental and social risks relative to the construction and operational phases and adjust the audit scope and frequency accordingly.

When undertaking audits the following should be considered:

- Define audit criteria and scope for each audit.
- Select audit staff competent in the audit process and subject matter.

- Ensure that audit results are reported to relevant senior management.

As required by Equator Principle 9, an Independent Environmental & Social Consultant should be required to undertake monitoring and reporting activities on behalf of the lenders for the period of the project loan. This should typically be on a quarterly basis during construction and annually during operation (to be confirmed at a later stage).

It is also possible for the Ministry of Environment to periodically audit (or potentially inspect) the site to conform compliance with national regulatory requirements. The requirement for the Ministry of Environment to provide advance notice prior to audit should be dependent on allowances within national legislation and the circumstances of the audit.

16 EMERGENCY PREPAREDNESS AND RESPONSE

The likelihood of an incident can be minimised by effective planning and development of a site pollution incident response plan as part of an ESMS.

All risk assessments and method statements should include consideration of the potential for environmental incidents. Suitable incident response equipment, such as spill kits, oil booms and absorbent material, should be held at appropriate locations on site.

The Environmental Manager should be responsible for preparing a bespoke Pollution Prevention and Response Plan for the Site to include requirements for co-ordination with the applicable external agencies (i.e. emergency services), impacted stakeholders and statutory authorities in the instance that a pollution incident occurs.

The plan should identify procedures for emergency situations associated with explosion, fire etc. and identify requirement for pollution response materials and where these are to be placed within the project area.

When establishing an emergency preparedness and response plan, the following should be considered:

- The most appropriate method for responding to an emergency situation.
- Internal and external communication process.
- The action required to prevent or mitigate environmental impacts.
- Mitigation and response actions to be taken for different types of emergency situations.
- The need for post-emergency evaluation to determine and implement corrective and preventative actions.
- Periodic testing of planned emergency response actions.

- Training of emergency response.
- A list of key personnel and aid agencies, including contact details (such as fire department, spillage clean-up services).
- Evacuation routes and assembly points.
- The possibility of the need for mutual assistance from neighbouring organisations/projects.

The CESMP and OESMP should identify all reasonable steps to be taken to prevent land contamination or water pollution from spills of fuel or other hazardous liquid and a suitable method of communicated the spill response procedure to site personnel.

17 NONCONFORMITY, CORRECTIVE ACTION AND PREVENTATIVE ACTION

All non-conforming actions observed during audits, inspections and monitoring activities should be recorded as a nonconformity.

Examples of nonconformity include:

- Works commence without an approved risk assessment and method statement that covers environmental issues identified herein.
- Risk assessment and method statements are not reviewed following any significant changes in requirements that could adversely impact the environment.
- A waste transport/disposal service provider is appointed that is not appropriately licensed.
- Breach in any Environmental Standards.
- Failure to comply with waste storage/disposal requirements as identified by risk assessment and/or method statement.
- Failure to comply with chemical storage and/or handling requirements.
- Un-containable or uncontrollable spills of fuels or chemicals.
- Works undertaken outside the scope defined with in the risk assessment and method statement.

Any situation or condition that poses an imminent risk to the environment should be immediately resolved. If the situation or condition cannot be corrected immediately, temporary measures as necessary for the protection of the environment should be implemented.

Each non-conformance should be recorded utilising a Non-conformance Report (NCR). All NCRs should include the following information:

- Location and description of the Non-conformance.
- The proposed corrective action including who holds responsibility for undertaking this action.
- A deadline for the corrective action.
- A proposed preventative action to ensure against reoccurrence of the non-compliance including who holds responsibility for undertaking this action.
- A deadline for the preventive action.

18 STAKEHOLDER ENGAGEMENT

Stakeholder engagement can be described as a systematic effort to understand and involve stakeholders and their concerns in the project activities and decision-making processes. Stakeholders are defined as any group or individual who can affect, or can be affected by, the project.

The main objectives for stakeholder engagement are:

- To inform the relevant stakeholders about the project;
- To capture views and concerns of the relevant stakeholders with regard to the project;
- To enhance ownership of the project within the host community;
- To provide a basis for stakeholder participation in impact identification and mitigation.

For projects that have environmental and social impacts, consultation is not a single conversation but a series of opportunities to create understanding about the project among those that are likely to be affected or might have an interest in it, and to learn how these stakeholders view the project and its related risks, impacts, opportunities, and mitigation measures. Listening to stakeholder concerns and feedback can be a valuable source of information to help identify environmental and social risks (real and perceived) and improve project management. This can be achieved by establishing relevant procedures in the ESMS for both the construction and operational phases of the project. The procedures should ensure stakeholder engagement and that dialogue with communities is maintained, whilst outlining a suitable grievance mechanism to allow community complaints to be raised in a clear process.

19 COMMUNICATION

The ESMS should establish and maintain processes needed for internal and external communication relevant to environmental and social performance of the project.

Lines of communication relevant to the construction phase should be clearly defined within the CESMP whilst lines of communication relevant to the operational phase should be clearly defined within the OESMP.

Associated processes should establish:

- What should be communicated
- When it should be communicated
- With whom to communicate
- How to communicate

When establishing communication processes relevant to the ESMS, particular note should be made to:

- Compliance obligations, including any reporting requirements to the Ministry of Environment.
- Reporting requirements required by the project lenders.

20 GRIEVANCE MECHANISM

20.1 Internal Grievances

The ESMS should identify a grievance procedure for workers to raise workplace concerns. The procedure should involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism should also allow for anonymous complaints to be raised and addressed.

The grievance mechanism should not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

All staff should be informed to the grievance procedure at the time of induction to the project and the procedure should be made readily available and easily accessible.

20.2 External Grievances

The ESMS should include a procedure for external communications that includes methods to receive and register external communications from the public, to include:

- A method to screen and assess the issues raised and determine how to address them.
- A method to provide, track, and document responses, if any.
- A method to adjust the ESMS management program, as appropriate, in response to external grievances.

The grievance procedure should be scaled to the risks and adverse impacts of the project and include consideration of any affected communities. It should seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client should inform the Affected Communities about the mechanism in the course of the stakeholder engagement process.

21 ESMS REVIEW

The ESMS (including the CESMP and OESMP) should be regularly reviewed according to changes in construction or operational activities and in response to results from monitoring, audits and inspection.

Reviews should be undertaken at a frequency to ensure adequacy of the ESMS and to ensure that all potentially significant adverse impacts are identified and that associated control measures are appropriate to the project.