

ENVIRONMENTAL AND SOCIAL ACTION PLAN SUSTAINABLE AKKAR WIND FARM

Introduction

Based on the findings of the Sustainable Akkar E&S Due Diligence Report (dated 11th September 2019), SLR has prepared this Environmental and Social Action Plan (ESAP) to:

- Address potential gaps between the Project Company's existing corporate policies, management systems, procedures and practices against the Lenders' environmental and social performance standards; and
- Prioritise areas related to the Project Company's proposed operations/activities that may require additional environmental and social mitigation measures and/or improvements to ensure full compliance with the Lenders' environmental and social performance standards and avoid, mitigate or compensate significant environmental and social impacts and risks.

A list of actions which have been prioritised as well as timescales for completion and an indication of current status are provided within the ESAP.

The ESAP will form part of the Lenders' agreement with the Client.

No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
IFC PS1 - Assessment and Management of Environmental and Social Risks and Impacts EIB ESS1 - Assessment and Management of Environmental and Social Impacts and Risks					
1.1	<p>Update the Social Impact Assessment (SIA) and Baseline to include the results of field work and engagements with:</p> <ul style="list-style-type: none"> • herders in Jabal-Akruom Kfartoun and Aandqet; • women in Jabal-Akruom Kfartoun and Aandqet; • families in Kfartoun opposing the projects; • NGOs; • vulnerable groups (engaged with through NGOs and/or local municipalities); • broader community of El Rweimeh; • other relevant stakeholders. <p>Update the definition of the Project Area of Influence with a list of communities/individual households/informal settlements in the DAOI.</p> <p>Include in the final SIA baseline, a specific section on vulnerable groups in the Project area of influence, with particular focus on DAOI.</p> <p>Include in the final SIA, a specific section on impact on vulnerable groups and suggested mitigation measures.</p> <p>Update mitigation measures and relevant management and monitoring plans as necessary.</p>	IFC PS1/ EIB ESS1, ESS10	In sufficient time for OPIC and FMO commercial teams to reach financial commitment (end Sept 2019).	Draft SIA document produced by IBIS has been reviewed by Lenders and SLR. Additional socio-economic data is currently being surveyed and evaluated by IBIS/ELARD. Engagement with Project stakeholders is ongoing. IBIS has committed to end-Sept deadline (30th Sept).	

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No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
1.2	<p>Actions arising from incomplete ESIA:</p> <p>Noise - The EPC Contractor should undertake noise modelling of the final site layout to confirm compliance with the IFC/MoE guideline/limits.</p> <p>Transboundary effects should be considered further for the Hawa Akkar ESIA, particularly with respect to cumulative impacts with the LWP (and SA), to help inform the level of impacts and the need for any mitigation.</p> <p>Biodiversity - Undertake consultation with stakeholders in the protected areas/designated sites (KBA, IBA, Karm Chbat reserve); and document outcomes.</p>	IFC PS1/EIB ESS1	Prior to commencement of construction		Yellow
			Prior to commencement of construction		Yellow
			Prior to commencement of early works		Red
1.3	<p>Implement an Environmental and Social Management System (ESMS), incorporating interactions between the Contractor, (name removed), LWP and Infratech.</p> <p>Review the management of change procedure in the ESMS to refer to design changes and the additional measures necessary for these.</p>	IFC PS1/EIB ESS1	Prior to Financial close.	LWP ESMS Manual has been developed. The Manual includes an E&S Policy, Management of Change Policy, and Anti-bribery and Corruption Policy.	Red
1.4	Obtain all environmental permits necessary for wind farm construction and operation (see Section 4.21 of LWP DD Report).	IFC PS1/EIB ESS1	Prior to commencement of construction		Yellow

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	<p>The discrepancy between the required power output and that approved by the MoE should be clarified by the Project Company.</p> <p>The following approval conditions should be satisfied:</p> <ul style="list-style-type: none"> • Approval from the General Directorate of Urban Planning • Approval of all entities concerned by creation and extension of roads as per rules in effect. • Provision of certified copies of the property certificates, especially for the lands located within the reserve of Karm Chbat • Provision of list of rented lands • Type and number of trees that might be cut down especially in the construction site, compensation plan, and approval from the Ministry of Agriculture on trees cutting 				
1.5	<p>Update the Construction Environmental and Social Management Plan (ESMP) for review and approval by the Lenders.</p> <p>The plan should provide sufficient detail on each mitigation measure so as to enable the responsible party to fulfil the requirement to mitigate the identified significant residual impacts. The following Requirements should be included as a minimum:</p>	IFC PS1/EIB ESS1	Prior to FMO credit paper (end of Sept.)	The Construction E&S Plan has been developed and contains a number of plans at varying stages of completeness	

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	<p>Social</p> <ul style="list-style-type: none"> Update the Construction ESMP based on the finalised SIA findings and stakeholder consultations. Develop a Livelihoods Restoration and Compensation Plan for the construction period based on additional data and engagement with the herders and their families (now ongoing). Update the HR policy with detailed procedures, including on labour and working conditions, terms of employment, etc; Update the Construction Management/monitoring plan. Develop a Community Benefit Sharing / Corporate Social Responsibility (CBS / CSR) Plan (see row 1.9). Update the Security Management Plan to include a Security Risk Assessment (to be conducted by Project Company/EPC contractor). <p>In accordance with the suggested Stakeholder Engagement Program during the early Construction Phase:</p> <ul style="list-style-type: none"> inform affected communities in advance about: <ul style="list-style-type: none"> the start of road vehicle movements and construction civil works; increased community H&S risk associated with project-related road safety movements (specific focus on women and children); local hiring process; provide updates on land access restrictions relating to specific locations and timeframes to herders and natural resource users; 				
				This action is currently proposed by SLR unless IBIS provide sufficient evidence that the plan is not required within the updated SIA.	
			Prior to commencement of early work		

No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
	<ul style="list-style-type: none"> Notify municipalities about the transport of project components. Plan and schedule and distribute a final transport road map two to three months prior to the start of transport; Coordinate transport and construction related activities with government officials (Ministry of Public Works and Transport and the Lebanese Army). 				
	<p>Hydrology and hydrogeology –</p> <ul style="list-style-type: none"> To undertake baseline monitoring of groundwater and surveying of drainage features, minor springs and potential karstic features to inform the mitigation needed. The additional points as set out in Environmental and Social Appraisal: Compliance Summary Table of Section 6.2 of the E&S Due Diligence Report. 				
	Traffic and Transport – see row 4.1.				
	<p>Air quality</p> <ul style="list-style-type: none"> Mitigation in the AQMP should be based on the results of an air quality assessment undertaken in accordance with good international practice (IAQM methodology or similar) The AQMP must include more comprehensive measures with respect to NRMM and vehicle emissions 				
	<p>Noise</p> <ul style="list-style-type: none"> The EPC Contractor should be required to undertake noise modelling of the proposed mitigation for the construction phase to demonstrate that the project will be compliant. 				

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	Hazardous waste management measures – see row 3.1				
	Emergency Response and Preparedness <ul style="list-style-type: none"> The Emergency Response and Preparedness Plan should cover all potential emergency scenarios that may impact human health, security, safety, and the environment within the Project area and surrounding communities. Include Natural Hazards risks in the Emergency Preparedness and Response Plan for the construction phase and also the operational phase. These should also include risks due to the project resulting in increased likelihood of natural hazards. 				
	Ice throw/blade throw <ul style="list-style-type: none"> Appropriate warning signs should be installed along the access roads to the individual wind turbines and in agreement with the public roads management authorities, at the entrance to the wind farm area. This should be included in the Community Health and Safety Plan. 		Prior to operation		
	Shadow flicker/Glint and glare <ul style="list-style-type: none"> The use of a matt, non-reflective finish for the wind turbines in accordance with the IFC EHS guidelines. 		Prior to operation		
	Biodiversity Action Management Plan – see row 6.1	IFC PS1, PS6/ EIB ESS3	Prior to commencement of early works and updated on receipt of further data		
	Avian Habitat Management and Monitoring Plan (AHMMP) - see row 6.2				

No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
	<p>Monitoring, Auditing and Reporting procedure – see also row 1.18</p> <ul style="list-style-type: none"> Finalise and implement the procedure to ensure proper implementation of mitigation measures during the construction and operational phases of the Project. The monthly report should include reporting on compliance with the Applicable Standards, legal and/or contractual obligations and regulatory requirements, and implementation of the ESMS, ESMP, ESAP and Stakeholder Engagement Plan where appropriate. A requirement should be included to review the results of monitoring and initiate corrective actions as necessary. 	IFC PS1/EIB ESS1	Prior to Finance Contract Signature and ongoing throughout the Project.	Procedure drafted in Construction ESMP	
1.6	<p>Opportunistic Influx management</p> <p>In accordance with the Local Hiring and Procurement Plan and SEP:</p> <ul style="list-style-type: none"> publicly disclose details of the local employment process and emphasise that communities located inside the DAOI are being preferentially offered opportunities. publicly announce that people should not move towards the project area seeking other forms of economic opportunities. monitor the arrival of newcomers and take additional measures if influx occurs (as per the abovementioned management plans). record the incidence of crime and other social ills. continue engagement with NGOs during ESMP implementation re. impact of influx on vulnerable groups in the DAOI. 	IFC PS1/EIB ESS1	Prior to commencement of construction.	Management measures in Local Hiring and Procurement Plan and SEP	
1.7	Draft and submit a complete Operational Phase ESMP to the Lenders for review and approval, to include but not limited to the following	IFC PS1/EIB ESS1	IBIS has committed to complete by Oct 2019		

No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
	<p>Management Plans:</p> <ul style="list-style-type: none"> • Solid Waste. • Hazardous Waste. • Waste Water. • Operational Noise. • Shadow Flicker Control. • Hazardous Substances. • Landscape. • Occupational Health and Safety. • Community Health and Safety. • Resource Efficiency and Pollution Prevention. • Hazardous Materials. • Biodiversity. • Avian Habitat Management and Monitoring (flight activity, carcass searches, radar). • Emergency Preparedness and Response (including Natural Hazard risks such as wildfire and flood). • Community Benefit Sharing. • Employee Training. • Local Hiring and Procurement Plan/ Workforce. • Security (including Security Risk Assessment). • Labour accommodation. • Labour and Working Conditions Plan. • Security. • 				

No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
	<p>The Operational ESMP should also include the following</p> <ul style="list-style-type: none"> • a requirement for the EPC contractor to undertake noise modelling to establish if the currently proposed 17 wind turbines will also need to run on noise-reduced mode and if this would also be necessary during the day. This modelling should also be used to determine at which wind speeds reduced noise mode is required. The modelling should use guaranteed sound power levels/an appropriate surcharge to confirm compliance with the IFC/MoE guideline/limits. • a strategy to deal with noise complaints and the need to undertake appropriate background noise monitoring prior to the start of the operational phase. • a requirement for the EPC Contractor to repeat the shadow flicker modelling to take into account size and orientation of the potentially affected windows to more accurately calculate the need for turbine shut down • that a guarantee will be obtained that the substation equipment will have no or minimal leakage of SF6 and/or that leakage detectors will be included and action taken if any leakages occur. (good international practice 				
1.8	Provide a conceptual Decommissioning Plan, including an indication of the proposed rehabilitation of the site.	IFC PS1/EIB ESS1 Best practice	Prior to commencement of construction.		

No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
1.9	<p>Community investment</p> <p>Develop and disclose Community Benefit Sharing / Corporate Social Responsibility (CBS / CSR) Plan outlining the Project Company's principles and criteria for selecting CBS / CSR contributions, recent activities and their beneficiaries.</p> <p>Consider clear rationale for choosing spatial coverage of CSR, principles, method of selecting projects, budgeting, etc.</p> <p>CSR needs assessment to include provisions for providing benefit-sharing to refugees/Dom people through NGOs (options include solar panels/water heating).</p> <p>Consider financial training for local residents, especially private land owners, whose land was acquired by the Project, on sustainable use of funds (or consider doing this through an ESMMP).</p>	<p>PS1/EIB ESS1, ESS10</p> <p>Best practice</p>	<p>Prior to FMO credit paper (end of Sept)</p> <p>Continue implementation throughout construction and operation</p>		
1.10	Disclose a Corporate Social Responsibility Report	<p>PS1/EIB ESS1, ESS10</p> <p>Best practice</p>	<p>Annually</p> <p>Continue throughout construction and operation</p>		

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No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
1.11	Ensure the implementation of the ESMS and ESMPs in compliance with lenders' requirements and national legislation. Update the ESMP as required as the project progresses or due to changes.	IFC PS1/EIB ESS1 National legislation	As soon as (and as long as) the ESAP and the lenders requirements are effective.		
1.12	Ensure the timely availability of resources (staff, budget, equipment) for the ESAP/compliance owner (Infratech E&S Manager) to organise and implement the project's E&S obligations under the ESAP, ESMS and ESMPs.	IFC PS1/EIB ESS1	As soon as (and as long as) the ESAP and the Lenders requirements are effective.		
1.13	Require the EPC contractor to appoint and maintain a person (with a direct reporting line to the EPC contract manager) responsible for the effective implementation of the EPC contract E&S obligations and for the compliance of the EPC contract activities with the Lenders' requirements.	IFC PS1/EIB ESS1	Prior to commencement of early works and maintain throughout construction.		
1.14	Require the EPC contractor to ensure the timely availability of resources (staff, budget, equipment) for the ESAP to organise and implement the EPC contractor's obligations under the ESAP and ESMP. Implement Local Hiring and Procurement Plan, undertake preliminary skills assessment.	IFC PS1/EIB ESS1	As long as the EPC contract is effective.		
1.15	Include ESMP obligations in the EPC contractor's contract. Any additional E&S requirements that arise during finalisation of the ESIA/ESMP package or due to design changes will be agreed with the Contractor	IFC PS1/EIB ESS1	Prior to EPC Finance Contract Signature		

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No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
1.16	Include obligations in all contractors and subcontractors (contracted either by the EPC contractor or by Project Company/Sponsor) contracts to work in compliance with the ESMP, Lenders' E&S requirements and national legislation. Contracts need to include a mechanism for inclusion of any additional E&S requirements that arise during finalisation of the ESIA package or due to design changes.	IFC PS1/EIB ESS1	Project Company/ Sponsor: inclusion of the obligations in the contract EPC contractor: implementation of the obligations.		
1.17	Project Company/Sponsor to appoint appropriate, experienced and qualified people to the following positions: <ul style="list-style-type: none"> • Community Engagement and Investment Officer (unless role can also be undertaken by current E&S Manager). • Site Environmental Officer (ECOW). • Security and human rights advisor. 	IFC PS1/EIB ESS1	Prior to commencement of preliminary site works.		
1.18	Submit regular reports to the Lenders on: <ul style="list-style-type: none"> • Environmental, social, occupational health and safety performance. • Status of ESMS and ESMP implementation. • Status of each ESAP action. • Status of Environmental, Health and Safety. • Compliance with Applicable Standards. • Status of Stakeholder Engagement Plan. • ECoW and biodiversity/avian monitoring. 	IFC PS1/EIB ESS1	Reports to be submitted on a quarterly basis during construction, and annually after for the duration of Lenders' financing of the Project. A template to be agreed prior to financial close.		

No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
1.19	Undertake monitoring by Lenders and Lenders Adviser of EPC Contractor/Operator's E&S performance to ensure compliance with ESMP requirements (to include inspections and meetings at agreed frequency).	IFC PS1/EIB ESS1	Throughout construction and operation.		
IFC PS2 Labour and Working Conditions EIB ESS8 Labour Standards EIB ESS9. Occupational and Public Health, Safety and Security					
2.1	Further develop the human resources policy by providing detailed procedures, including on labour and working conditions, terms of employment, etc. Implement the human resources policies and procedures to ensure rights of workers.	IFC PS2/EIB ESS8 EU/ILO Standards National legislation	Prior to Financial close. To be maintained throughout the life of the Project.	A high-level Human Resource Policy is developed, however, it lacks procedures, including the labour and working conditions. The Construction ESMP contains a number of HR-related plans at varying stages of completeness.	
2.2	Project Company/Sponsor to disclose a 'Workers' grievance mechanism' to all direct and sub-contracted employees and provide them with information on the channels and communication protocols for raising a grievance. Workers should be informed of the process at the time of being hired in their local language. Keep a Grievance Register. Produce grievance resolution progress reports	IFC PS2/EIB ESS8	Prior to the commencement of preliminary site works.		

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No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
2.3	Monitor the Project's supply chain HR policies and performance with regards to protection of vulnerable categories of workers and avoidance of forced and/or child labour.	IFC PS2/EIB ESS7 and ESS8	Prior to the commencement of preliminary site works.		
2.4	Project Company/Sponsor to develop a policy regarding retrenchment following the construction phase.	IFC PS2/EIB ESS8	Prior to the commencement of preliminary site works.		
2.5	<p>Develop and implement an appropriate Health, Safety and Security (HSS) plan, to be based on the Occupational Health and Safety risk register provided in the ESIA. To include setting of appropriate objectives responsibilities for and authorities of personnel, ensuring that appropriate competent resources are available, arrangements for implementation, and arrangements for reporting, monitoring, review and corrective actions.</p> <p>HSS system to include a requirement to wear correct PPE on site and to ensure this is the case through education/ training and enforcement. Leadership training at management and supervisor level should be a part of this.</p>	IFC PS2/EIB ESS9	Prior to the commencement of preliminary site works.		
2.6	Further develop and implement a Workers Accommodation Management Plan.	IFC PS2/EIB ESS9	Prior to the commencement of preliminary site works		

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No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
	Include recommendation to accommodate workers in less conservative/more liberal religious communities.	Workers' Accommodation: Processes and Standards, published by IFC/EBRD in August 2009.			
2.7	Undertake accommodation audits of construction workers' accommodation.	IFC PS2/EIB ESS9	Forms part of Lenders inspections.		
2.8	Implement a Security Management Plan Conduct Security Risk Assessment (to be undertaken by Project Company/EPC Contractor) Have provisions in the plan for an EPC Site security manager. Train security personnel and keep records of training sessions.	IFC PS2/EIB ESS9	Prior to Financial close.		

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No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
IFC PS3 Resource Efficiency EIB ESS2 Pollution Prevention and Abatement					
3.1	As part of the hazardous waste management measures included in the ESMP include a requirement to identify the availability of licensed hazardous waste management facilities in the Lebanon to support hazardous waste disposal throughout the Project.	IFC PS3/EIB ESS2 International conventions, e.g. Basel; Stockholm.	Locations identified prior to the commencement of construction.		
IFC PS4 Health and Safety EIB ESS9 Occupational and Public Health, Safety and Security					
4.1	Finalise and implement a Road Traffic Safety Management Plan as part of the ESMP to protect workers and the local community. Plan to include: <ul style="list-style-type: none"> The completion of a final route review once the specific model of wind turbine has been selected in order to establish the need for any additional obstacle removal. The assessment of the additional traffic due to the construction of the LWP to determine the need for additional mitigation, if any. The outcomes of this should then be used to inform stakeholder engagement with the local communities prior to the start of the construction works. Designated transport routes for construction vehicles. 	IFC PS4/EIB ESS9 Good international practice National legislation	Prior to construction		

No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
	<ul style="list-style-type: none"> • Driver training and code of conduct for driving. • Actions to limit and check vehicle speeds. • Measures to minimise local obstructions. • Traffic safety measures (e.g. use of signs, barriers and flag men as appropriate). • Consider advanced driver training. 				
4.2	<p>Implement Construction ESMP to protect local communities, to include:</p> <ul style="list-style-type: none"> • Public notices and signs of construction work and hazards • Announcements through newsletters, leaflets and media updates • Security measures during construction • Notices/signs and barriers to all energised areas • Engagement with informal settlements through local municipalities or NGOs • 'Road safety' messages for children, particularly of refugees/Dom people/road safety lessons at schools. Children to be engaged via experienced NGOs and municipalities • Grievance Mechanism, sensitive to refugees and Dom people 	<p>IFC PS4/EIB ESS9</p> <p>National legislation</p>	<p>Prior to commencement of preliminary site works.</p> <p>To be implemented throughout project.</p>		

No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
IFC PS5 Land Acquisition, Involuntary Resettlement and Economic Displacement EIB ESS6 Involuntary Resettlement					
5.1	<p>Complete engagement activities with herders and their families in Jabal-Akruom Kfartoun and Aandqet to find out all potential impacts. Consider broader engagement with the communities where the shepherds come from.</p> <p>Develop and implement a Livelihood Restoration Plan (LRP) for the construction phase of the Project.</p> <p>Determine value of grazing livelihood loss and negotiate compensation with the herders (provision of fodder or other).</p> <p>Monitor implementation of the LRP.</p>	<p>IFC PS5/EIB ESS6</p> <p>National legislation</p>	Prior to commencement of preliminary site works.	Ongoing	
5.2	<p>Complete engagement activities with land owners opposing the SA Project.</p> <p>Develop and include in the SIA a compensation scheme to control future land use restrictions of residential development within the planned 'buffer zones'</p>	<p>IFC PS5/EIB ESS6</p>	Prior to commencement of preliminary site works.	Ongoing	

No.	Action/Deliverable	Requirement (Legislative, Lenders' criteria, Best Practice)	Timetable	Status	Risk Ranking
IFC PS6 Biodiversity and Living Natural Resources EIB ESS3 Biodiversity and Ecosystems					
6.1	<p>Prepare a Biodiversity Action Management Plan:</p> <ul style="list-style-type: none"> • Update baseline data for bats, ornithology and habitat mapping when available. Update habitat loss calculations and re-assess outcomes and mitigation requirements where necessary. The bat risk assessment will need to be updated as information is received from the field. Mitigation will then need to be included in the BAMP. • Complete Critical Habitats Assessment once habitat mapping has been fine-tuned and updated. This may change the outcome of the assessment. Mitigation in the BAMP can be then developed to ensure No Net Loss /Net Gain and to demonstrate how the mitigation hierarchy has been applied. • Mitigation for loss of natural habitat must be provided. • Apply the mitigation hierarchy when preparing the BAMP • The BAMP must also address the remaining MoE's conditions for planning in respect of Biodiversity. <ul style="list-style-type: none"> ○ Provision of a Bat Monitoring Protocol including daily observation of bat deaths due to collision especially during the first year of the project ○ An evaluation of the project impact on Aandqet Forest, which is a proposed Nature Reserve) ○ Offsetting plan for the negative environmental 	IFC PS1, PS6/ EIB ESS3	Prior to commencement of preliminary site works.	The full mammal survey will be not completed by September 2019. the contract with Dr. Mounir will be completed in March 2020 (providing one year of assessment).	

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	<p>impact on the area surrounding the project (taking Aandqet Forest nature reserve in to account).</p> <ul style="list-style-type: none"> • Include for the control of invasive species 				
6.2	<p>Prepare an Avian Habitat Management and Monitoring Plan (AHMMP)</p> <ul style="list-style-type: none"> • The AHMMP must also address the MoE's conditions for planning in respect of birds. <ul style="list-style-type: none"> ○ Provision of a Bird Monitoring Protocol from the Lebanese Center for Energy Conservation (LCEC), ○ Inclusion in the Monitoring Protocols of the daily observation of bird deaths due to collision especially during the first year of the project • Prepare breeding bird distribution maps and/or pre construction surveys in order to inform habitat loss calculations and mitigation for the IBA. • Extend the monitoring proposed with regard to vantage point watches from years 1,2 & 3 to 5, 10, 15 and 25. • Undertake a carcass removal trial to inform the carcass search frequency and include detailed monitoring programme and protocol in the BAMP. • A detailed protocol for assessing the requirement for turbine shutdown should be provided in the BAMP, as should consideration of what may be involved in the use of radar at the site. This will be further informed by the updated collision risk modelling results due in January 	IFC PS6/ EIB ESS3	Prior to commencement of preliminary site works.		

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	<p>2020. Acoustic and visual deterrents should also be considered.</p> <ul style="list-style-type: none"> It should be explicitly mentioned in the BAMP that an EcoW or team of ECoWs must be employed to manage the requirements of the monitoring as well as enforcement of no hunting on site etc. A clear role should be set for the EcoW and more than one ECoW may be needed on site, or specialist ecologists may be required to support the individual in this role e.g. to undertake a clearly defined scope of works with regard to issues such as: flight activity monitoring, habitat use monitoring, carcass searches, the prevention of hunting, etc 				
6.7	Undertake an ecosystems services assessment.	EIB ESS3 /IFC PS1, PS6	Prior to Finance Contract Signature.		
IFC PS7 Indigenous People EIB ESS7 Rights and Interests of Vulnerable Groups					
7.1	Not applicable.				
IFC PS8 Cultural Heritage EIB ESS5 Cultural Heritage					
8.1	Implement Heritage Resources Management Plan.	IFC PS8/EIB ESS5	Prior to commencement of		

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	Monitor implementation		preliminary site works and throughout the construction and operational phases.		
IFC PS Financial Intermediaries					
9.1	Not applicable				
EIB ESS10 Stakeholder Engagement					
10.1	<p>Update the Stakeholder Engagement Plan (SEP) based on the findings of the Supplementary SIA and ongoing engagement.</p> <p>Implement the SEP for the life of the Project.</p> <p>Revise and update the SEP on a regular basis.</p> <p>Publicly disclose the SEP.</p> <p>Keep a Stakeholder Engagement Log.</p> <p>Keep meeting minutes.</p>	IFC PS1 EIB ESS1, ESS7, ESS10.	Prior to FMO credit paper (end Sept.).		

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10.2	Revised photomontages should be prepared for any ongoing stakeholder engagement where visualisations are required. All photomontages should have a version with a minimal 30cm viewing distance and a wider panorama where a wide-angle view is present. A revised ZTV should also be used for public engagement, based on the final GE wind turbine layout.	IFC PS1/ EIB ESS1, ESS10	Ongoing		
10.3	Stakeholder engagement should include information on shadow flicker and its occurrence, including noting which properties are likely to experience shadow flicker and that the turbines will be shut down to prevent this exceeded the 30 day/30 minute limit.	IFC PS1/ EIB ESS1, ESS10	Ongoing		
10.4	<p>Implement the external Grievance Mechanism.</p> <p>Establish trusted, understandable and transparent process, providing timely feedback to those concerned, without any retribution, and allowing for anonymous complaints to be raised and addressed.</p> <p>Inform the project-affected communities and other relevant stakeholders of the grievance mechanism and encourage them to use the system if they have concerns or grievances with regards to the Project, including sub-contractor performance.</p> <p>Ensure that a Grievance Mechanism is sensitive to vulnerable groups.</p>	IFC PS1/ EIB ESS1, ESS10.	<p>Within 6 months after ESAP agreement with the Lenders.</p> <p>Throughout the life of the Project.</p>		

Environmental and Social Risks Definition

Environmental and Social Risk Ranking	Definition	Indicative Timescales
Low	A low risk rating is where the environmental or social aspect can be easily addressed by the Project through development of environmental management procedures and easily implemented mitigation measures. There is already a good understanding of the impact based on the information gathered and the sensitivity of the receiving environment. Identified gaps/risks can be addressed after financial close and through continuous improvement as the project progresses.	Improvement actions are recommended to be undertaken prior to commencement of construction or on an ongoing basis.
Medium	A medium risk rating is where the environmental and social aspect could cause a challenge to the Project development, assessments and permit / licence application and / or meeting international requirements. Aspects defined as medium risk are those where the Project is required to address a gap and/or undertake additional activities but these should be achievable in time for financial close or within three months post financial close and decision to finance is not dependent on the results, but simply addressing the gap. Medium risks are generally those where there is a lack of understanding of the impact based on the information gathered and the sensitivity of the receiving environment, further investigation required may have an impact on Project programme as the information gaps and / or mitigation measures required are more complex.	Improvement actions are recommended to be undertaken following financial close but prior to commencement of construction.

Environmental and Social Risk Ranking	Definition	Indicative Timescales
High	<p>A high risk rating is where the project does not meet the requirements of a PS or national legislation and approvals and/or results of additional studies and work are required in order to fully define the risk and make a decision on whether the Project should be financed. These are risks that the Project would find it difficult / very challenging to address / mitigate the impacts to this aspect / item. Significant amount of additional data and / or assessment is required, impacts on programme are expected, and/or mitigation measures available are limited and difficult to implement. Items rated as high risk are gaps/risks that must be addressed and implemented prior to financial close.</p>	<p>Issues to be addressed prior to financial close (Conditions Precedent (CP)) or prior to commencement of early works.</p>