

## Environmental and Social Action Plan (ESAP) - Ulaanbaatar to Darkhan Road Project

Key:

MRTD responsibility	Contractor responsibility	MRTD / PIU responsibility
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No.	Action	Environmental & Social Risks (Liability/ Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
<b>PR1</b>	<b>Assessment and Management of Environmental and Social Impacts and Issues</b>						
1.1	<b>Environmental and Social Assessment.</b> Incorporate ESAP and ESIA mitigation, management and monitoring measures and permit requirements into contractual arrangements with contractors.	Compliance of contractors with EBRD PRs.	EBRD PR1 to EBRD PR10 excluding PR7 & PR9.	Internal resource (MRTD).	Prior to issue of invitation to tender - June 2019.	Invitation to tender incorporated ESAP and ESIA mitigation measures and permit requirements. This should include as a minimum the requirement for contractors to address the following: <ul style="list-style-type: none"> <li>Adopt Project Environmental, Social, Health and Safety management system (ESHS) and policies and Environmental and Social Management and Monitoring Plan (ESMMP), including any surveys, monitoring and/or due diligence required</li> <li>Develop, implement and maintain detailed site Environmental and Social Management and Monitoring Plan (ESMMP)</li> <li>Obtain necessary permits and maintain permits/register</li> <li>Develop detailed Construction Stakeholder Engagement Plan (SEP)</li> <li>Report on ESHS performance</li> </ul>	
1.2	<b>Environmental and Social Management Systems (ESMS).</b> Develop and implement an integrated ESMS that includes Occupational Health and Safety (OHS) – to be called the Project ESHS. This should include:	Optimisation of ESHS management through a formalised system.	EBRD PR1. Good international practice. ISO 14001. ISO 45001.	MRTD / PIU.	Develop prior to construction. Review of compliance of contractors during	Develop and implement integrated Project ESHS management system.	

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	<ul style="list-style-type: none"> <li>• Policies, plans and procedures (including the Project ESMMP required to be followed by contractors);</li> <li>• Roles and roles and responsibilities (including clear management of interfaces); and</li> <li>• Project schedule/programme to monitor and manage future activities.</li> </ul> <p>Integration of Project ESHS and ESMMPs across contractors and with the ADB project required at common interfaces. Clear roles and responsibilities to be identified.</p> <p>Relevant requirements during construction should be made the responsibility of contractors, monitored by the PIU, and during operation the responsibility of the MRTD.</p> <p><i>[Note: system(s) should generally meet objectives of ISO 14001 and ISO 45001, but need not be certified].</i></p>				construction.		
1.3	<p><b>Environmental and Social Policy.</b></p> <p>Develop Project policies and Code of Conduct within Project ESHS, covering as minimum:</p> <ul style="list-style-type: none"> <li>• Environmental and Social policy</li> <li>• Human resources policy (covering labour and working conditions and community health and safety)</li> <li>• Contractor/Supplier policy</li> <li>• Code of Conduct</li> </ul> <p>Contractors shall be required to comply with Project policies.</p>	To ensure delivery of the Project across contractors in compliance with EBRD PRs.	EBRD PR1, PR2, PR4.  Good international practice.	MRTD / PIU.	Prior to construction.  Review of compliance of contractors during construction.	Policies developed and integrated into Project ESHS.	
1.4	<p><b>Environmental and Social Management and Monitoring Plan (ESMMP).</b></p> <p>The Supplementary ESMMP shall form part of the tender documentation.</p> <p>The MRTD/PIU will be responsible for updating the Supplementary ESMMP prior to construction to reflect final design and the results of additional survey work (archaeology and ecology), that</p>	Optimisation of ESHS management through a formalised system.  Contractor management.	EBRD PR1, PR 3, PR4.  Good international practice.	MRTD / PIU.	Supplementary ESMMP to be included as part of disclosure.  Supplementary ESMMP to be provided in tender documents.	Project ESMMP updated and integrated into Project ESHS management system.  Provided to Bank for review and no-objection approval.	

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	<p>contractors must follow.</p> <p>This Project ESMMP should cover as a minimum:</p> <ul style="list-style-type: none"> <li>• Roles and responsibilities</li> <li>• General measures to be employed</li> <li>• Site specific measures to be employed</li> <li>• Inspection and monitoring requirements, including tools</li> <li>• Inspections, audits and reporting</li> <li>• Non-conformance and Accident/Incident procedures</li> </ul>				Updated Project ESMMP to be provided prior to construction.		
1.5	<p><b>ESMS, Policies and ESMMP.</b></p> <p>Implement the Project ESHS, including policies and Project ESMMP (#1.2, 1.3 and 1.4).</p> <p>As necessary, develop detailed Lot-specific Construction ESMMP based on the Project ESHS performance requirements and the Supplementary ESIA/ESMMP/Project ESMMP and site requirements (e.g. temporary landtake requirements), for approval by PIU.</p> <p>Topics to be covered in the Lot-specific Construction ESMMP include as a minimum:</p> <ul style="list-style-type: none"> <li>• Water management</li> <li>• Emergency preparedness and response (see 4.6)</li> <li>• Spill prevention and response</li> <li>• Materials use (including borrow pits and quarry management) and waste management</li> <li>• Hazardous materials management</li> <li>• Cultural heritage</li> <li>• Labour management (including construction camps) (see 2.1)</li> <li>• Labour grievance mechanism (see 2.6 to 2.8)</li> <li>• Biodiversity (see PR6)</li> <li>• Traffic management (on and off construction site areas) (see 4.4)</li> <li>• Occupational Health and Safety (OHS) (see 4.1)</li> <li>• Community health and safety (see 4.2)</li> <li>• Air emissions</li> </ul>	<p>Optimisation of ESHS management through a formalised system.</p> <p>Contractor management.</p>	<p>EBRD PR1, PR3, PR4.</p> <p>Good international practice.</p>	Contractor (and any of their sub-contractors).	<p>Develop prior to construction on site.</p> <p>Maintain permanently during construction.</p>	<p>Develop detailed Lot-specific Construction ESMMP, approved by PIU.</p> <p>Plans provided to Bank for review and no-objection approval.</p> <p>Implement Lot-specific Construction ESMMP and report through monthly, quarterly and annual reporting.</p>	

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	<ul style="list-style-type: none"> <li>• Noise and vibration</li> <li>• Security</li> <li>• Training Plan</li> <li>• Site rehabilitation</li> <li>• Stakeholder Engagement Plan including a community grievance mechanism (see PR10)</li> <li>• Training</li> <li>• As required, land acquisition and resettlement plan (see PR5)</li> </ul> <p>The management plans should, as necessary, identify impacts of proposed location of borrow pits, construction camps and any temporary works areas including any haul/access roads.</p> <p>Detailed monitoring requirements/plan to be incorporated into ESMMP.</p>						
1.6	<p><b>Environmental and Social Management Plan (ESMP).</b></p> <p>Develop an Operation and Maintenance (O&amp;M) ESMMP.</p>	Optimisation of ESHS management through a formalised system.	EBRD PR1, PR3, PR4. Good international practice.	MRTD / PIU.	Develop prior to operation. Maintain permanently during operation.	Develop detailed O&M ESMMP. Plans provided to Bank for review and no-objection approval.	
1.7	<p><b>Permits.</b></p> <p>Permit register to be developed and provided to contractors.</p> <p>Monitor contractors to ensure permits are in place and their compliance with permit requirements.</p>	Compliance with EBRD PRs and Mongolian legislation.	EBRD PR1. Mongolian legislation.	MRTD / PIU.	Develop prior to construction on site. Maintain Project permit register up-to-date during construction and operation.	Project Permit Register. Maintained overall Project permit register and record of permits obtained.	
1.8	<p><b>Permits.</b></p> <p>Ensure relevant permits are in place and compliance with permit requirements for relevant Lot(s).</p> <p>All necessary permits to be in place prior to the start of permitted activities (e.g. water abstraction permit batching plant, construction camps, borrow pits, etc.).</p>	Compliance with EBRD PRs and Mongolian legislation.	EBRD PR1. Mongolian legislation.	Contractor.	Maintain Lot permit register up-to-date during construction and operation.	Permit Register for relevant Lot(s). Maintained Lot permit register(s) and record of permits obtained.	
1.9	<b>Organisational Capacity and Commitment (PIU).</b>	Ensure appropriate	EBRD PR1, PR2.	MRTD / PIU.	Prior to start of	PIU Project organogram.	

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	Clearly identify team structures, organisations roles and responsibilities (MRTD/PIU/EBRD), including interface with the ADB project (ADB/PIU). Provide all key roles in an organogram. Assess the capacity of PIU staff, contractors and other key appointments.	Organisation Capacity and Competency.	Good international practice.	Cost dependent on resource required for PIU staff.	construction.	Named personnel for roles. Appointment of qualified ESHS lead and staff within PIU.	
1.10	<b>Organisational Capacity and Commitment (PIU).</b> Appoint and maintain person(s) to be responsible for ESHS within the PIU in accordance with PIU consultant job descriptions.	Ensure appropriate Organisation Capacity and Competency.	EBRD PR1, PR2. Good international practice.	MRTD / PIU. Cost dependent on resource required for PIU staff.	Prior to start of construction.	Named personnel for roles. Appointment of qualified ESHS lead and staff within PIU.	
1.11	<b>Organisational Capacity and Commitment (Contractor).</b> Provide sufficient staffing to manage the ESHS performance of the construction phase for relevant Lot(s).	Ensure appropriate Organisation Capacity and Competency.	EBRD PR1, PR2. Good international practice.	Contractor.	Prior to start of construction.	Appointment of qualified contractor person, including ESHS lead per contractor, approved by PIU. Named personnel for roles.	
1.12	<b>Supply Chain Management.</b> Develop and implement Contractor/Supply Chain Management Plan to manage ESHS planning and performance of construction and the supply chain, including as a minimum: <ul style="list-style-type: none"> <li>Inclusion of relevant ESAP requirements in contracts/subcontracts</li> <li>Review of contractor tenders</li> <li>Review of contractor policies, procedures and plans upon selection and appointment.</li> <li>Verification of training and/or proper credentials for contractor staff/managers responsible for ESHS</li> <li>Inspection and auditing requirements and frequency</li> </ul>	Contractor/Supply chain management.	EBRD PR1, PR2.	MRTD / PIU.	Ongoing.	Supply Chain Management Plan. Tender reviews.	
1.13	<b>Project Monitoring and Reporting.</b> Verification of training and professional qualifications for contractor ESHS managers and staff. Review of Lot-specific Construction ESMMP, policies and practices upon selection and	Continual assessment of ESHS performance against EBRD PRs. Contractor/supply chain management. To record incidences	EBRD PR1 to EBRD PR10 excluding PR7 & PR9. Good international practice.	MRTD / PIU.	Ongoing during construction (monthly, quarterly and annually).	Inspection reports. Submission of monthly and quarterly reports to Bank on ESHS performance on schedule and in a mutually agreed format. Submission of Environmental and	

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	<p>appointment.</p> <p>Conduct regular audit/inspection of contractors' ESHS performance, including inspections of contractors' construction works and camps with action tracking and feedback loop to contractor.</p> <p>Set up and maintain an ESHS incident reporting procedure to maintain records of annual monitoring, accidents and incidents. The procedure must be overarching, unique and integrated for the Project and used by all contractors.</p> <p>Submit report to the Bank on ESHS, including status of each ESAP action and other agreed activities including resolution of grievances associated with the project.</p>	and apply lessons learned.				Social Annual Report (ESAR) to Bank.	
1.14	<p><b>Project Monitoring and Reporting.</b></p> <p>Provide regular reports on performance to PIU during construction.</p> <p>Provide ESHS incident reporting in accordance with Project procedure. Identification of corrective actions procedure.</p>	<p>Continual assessment of ESHS performance against EBRD PRs.</p> <p>To record incidences and apply lessons learned.</p>	EBRD PR1 to EBRD PR10 excluding PR7 & PR9.	Contractors.	<p>Requirement for contractor reporting on ESHS aspects incorporated into tender documents.</p> <p>Monthly, quarterly and annually during construction.</p>	<p>ESHS incident reports.</p> <p>Submission of reports on ESHS compliance on schedule and in a mutually agreed format to PIU.</p> <p>Contractor reports sufficient to allow PMU to include relevant data in reports to the Bank, and to allow evaluation of need for corrective actions.</p>	
<b>PR2</b>	<b>Labour and Working Conditions</b>						
2.1	<p><b>Human Resource (HR) Policies and Working Relationships.</b></p> <p>Develop and adopt a HR Policy and Labour Management Plan covering all employees, contractors and sub-contractors, and incorporate into contractual arrangements with employees and contractors, to include (but not be limited to):</p> <ul style="list-style-type: none"> <li>Approach to managing its workforce, including third party and supply chain</li> <li>Management of worker relationships</li> <li>Access to worker's organisations</li> </ul>	To ensure management of workforce in line with EBRD requirements and Mongolian Labour Law.	<p>EBRD PR2.</p> <p>Mongolian Labour Law.</p> <p>Good international practice.</p>	MRTD / PIU.	<p>HR policy and Labour Management Plan developed and adopted prior to construction activities commencing.</p> <p>Contractor policies/ procedures</p>	<p>Project policies and Labour Management Plan prepared and implemented.</p> <p>Project and contractor HR policies compliant with EBRD PR2 and the national Labour Law.</p>	

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	<ul style="list-style-type: none"> <li>• Human rights</li> <li>• Working conditions and terms of employment</li> <li>• Child labour and forced labour policies</li> <li>• Equal opportunities and non-discrimination</li> <li>• Occupational health and safety</li> <li>• Bribery and corruption</li> <li>• Oversight provided of contractor policies/procedures</li> <li>• Access by all workers to policy/procedures in their language(s)</li> <li>• Arrangement for inspections</li> </ul>				<p>reviewed/ approved: prior to work on-site.</p> <p>HR Policies implemented throughout construction and operation.</p>		
2.2	<p><b>Human Resource Policies and Working Relationships.</b></p> <p>Set goals for and encourage contractors to hire local workers, with preference for those who may be directly affected by noise, traffic, or other project activities.</p>	<p>Provision of equal opportunities and improving economic prospects of local residents.</p>	<p>EBRD PR2. Good international practice.</p>	<p>MRTD / PIU.</p>	<p>Develop prior to construction activities.</p>	<p>Goals identified in tender documentation.</p>	
2.3	<p><b>Human Resource Policies, Working Relationships, Wages, benefits, and Conditions of Work.</b></p> <p>Follow Project HR policies and Project Labour Management Plan.</p> <p>Demonstrate employment of local population taking into account gender policy and local skills, with preference for those who may be directly affected by noise, traffic, or other project activities. Provide necessary training to upgrade skills of unskilled local workers.</p> <p>Ensure risk insurance policies available triggered automatically.</p> <p>Demonstrate use of local supply chains.</p> <p>Put arrangements in place for construction workers so that they have access to welfare facilities such as toilets and shaded and/or heated locations for breaks.</p>	<p>To ensure management of workforce in line with EBRD requirements and Mongolian Labour Law.</p> <p>Provision of equal opportunities and improving economic prospects of local residents.</p> <p>To ensure welfare of workers during site preparation and construction activities.</p>	<p>EBRD PR2. Good international practice.</p>	<p>Contractor.</p>	<p>Prior to and during construction.</p>	<p>Detailed contractor policies and plans provided for approval by PIU, including arrangements to be put in place for construction workers prior to start of construction.</p> <p>Report on numbers of local residents employed, taking into account gender policy within the monitoring reports to PIU.</p>	
2.4	<p><b>Wages, Benefits, and Conditions of Work and Accommodation.</b></p>	<p>To minimise the impact of any in-migration of</p>	<p>EBRD PR2. Good international</p>	<p>Contractor.</p>	<p>Contractor document prior to construction of</p>	<p>Necessary permits in place. Workers' Camp Management Plan.</p>	

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	Provide labour accommodation strategy and principles, in accordance with EBRD guidance for workers accommodation camps. Identify a suitable location of accommodation and obtain any necessary permits. Adopt Project Code of conduct and ensure all personnel are trained in the Code.	construction workers on local communities. To ensure welfare of workers.	practice.		labour accommodation, or camp being accommodated by workers.	Camp set up and maintained in compliance with EBRD requirements. Code of Conduct in place and evidence of training of personnel in the Code.	
2.5	<b>Wages, Benefits, and Conditions of Work and Accommodation.</b> Review constructors' labour accommodation strategy and principles. Undertake periodic camp inspections.	To standardise accommodation provided to workers employed by contractors.	EBRD PR2.	MRTD / PIU.	Prior to and during construction.	Monitoring reports.	
2.6	<b>Grievance Mechanism.</b> Set up and maintain a formal Project labour grievance mechanism, free of retribution, for employees and contractors and disseminate information about its uses to the workforce in the language(s) of the workers/ contractors, including possibility of anonymous grievances submission. <i>(Note: this mechanism is separate from the one for external stakeholders that is part of the Stakeholder Plan under PR/PS 10).</i>	To provide a channel for raising workers' concerns and a transparent, consistent mechanism for resolution.	EBRD PR2, PR10. Good international practice.	MRTD / PIU.	Develop prior to construction. Implement during construction and operation.	Adoption of formal Project labour grievance mechanism. Submission of AESR to Bank.	
2.7	<b>Grievance Mechanism.</b> Set up and maintain a formal labour grievance mechanism for contractor employees and disseminate information about its uses to the workforce in the language(s) of the workers, including possibility of anonymous grievances submission.	To provide a channel for raising workers' concerns and a transparent, consistent mechanism for resolution.	EBRD PR2, PR10. Good international practice.	Contractor.	Develop prior to activities commencing. Implement during construction.	Adoption of formal labour grievance mechanism for contractor employees in line with Project ESHS. Grievances and resolutions proposed to be reported to PIU as a minimum in monthly reports.	
2.8	<b>Grievance Mechanism.</b> Set up and maintain a Project formal labour grievance mechanism for employees and contractors and disseminate information about its uses to the workforce in the language(s) of the workers/ contractors, including possibility of anonymous grievances submission.	To provide a channel for raising workers' concerns and a transparent, consistent mechanism for resolution.	EBRD PR2, PR10. Good international practice.	MRTD / PIU.	During operation.	Adoption of formal Project labour grievance mechanism. Submission of AESR to Bank.	



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2.9	<b>Security Personnel Requirements.</b> Conduct due diligence investigation for all security personnel to make sure they have appropriate licensing, experience and training. Provide evidence to the PIU.	Prevent conflict between security personnel and local communities.  Prevent potential human rights violations by security personnel.	EBRD PR2.	Contractor.	Prior to employing security personnel.  Incident reporting during construction.	Due diligence carried out and documented/reported to PIU.  Report to EBRD any incidents involving security guards.	
<b>PR3</b>	<b>Resource Efficiency and Pollution Prevention and Control</b>						
3.1	<b>Resource Efficiency.</b> Report on resources to be used and efficiency measures to be put in place for energy use, water use, etc.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Contractor.	Prior to construction activities commencing.	Requirement for contractor to prepare details on resource efficiency and include within Lot-specific Construction ESMMP.	
3.2	<b>Air Emission Controls and Monitoring.</b> Prepare and implement detailed Construction ESMMP with measures to control fugitive emissions and point source emissions and dust as identified in the Supplementary ESIA/ESMMP/Project ESMMP.  Crusher site and mixing plants should be located at least 500 m to 1 km downwind from receptors.  Develop detailed air quality monitoring plan and conduct baseline air quality monitoring in accordance with requirements set out in the Supplementary ESIA/ESMMP.  Conduct visual dust monitoring daily during construction.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Contractor.	Develop prior to construction activities commencing.  Implement prior to and during construction.	Detailed air quality and dust management plan approved by PIU.  Plans provided to Bank for review and no-objection approval.  Pre-construction baseline established.  Periodic air quality monitoring, as required.  Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.	
3.3	<b>Pollution Prevention and Control – Waste waters.</b> Prepare and implement detailed Construction ESMMP with enhanced measures on waste water management in line with the Supplementary ESIA/ESMMP/Project ESMMP. Specify measures to be used on site and at camps.	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Contractor.	Develop prior to construction activities commencing.  Implement during construction.	Detailed waste water management plan approved by PIU.  Plans provided to Bank for review and no-objection approval.  Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU	
3.4	<b>Water.</b>	Management of	EBRD PR3.	Contractor.	Develop prior to	Detailed Construction Water	

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	<p>Undertake a water needs and impacts assessment for water demand during construction.</p> <p>Prepare and implement detailed Construction Water Management Plan with enhanced measures to protect local water sources in line with the Supplementary ESIA/ESMMP/Project ESMMP.</p> <p>Identify location of herder groundwater supplies prior to construction on site and protect them from damage in construction. Survey of well presence in all areas affected by construction including camps, lay down areas and haul roads.</p> <p>Develop 'water protection zones' around surface water identified in DEIA and Supplementary ESIA/ESMMP/Project ESMMP. No refuelling to be permitted within 50 m of zone of these sites.</p> <p>Any water permits required to be obtained prior to abstraction. Provide well drilling (water supply) method statement for any wells proposed.</p> <p>Monitor water use/extraction from groundwater wells.</p>	<p>environmental impacts on receptors.</p>	<p>Compliance with regulatory requirements of Mongolia.</p> <p>Good international practice.</p>		<p>construction activities commencing.</p> <p>Implement prior to and during construction.</p>	<p>Management Plan approved by PIU.</p> <p>Plan provided to Bank for review and no-objection approval.</p> <p>Herder well survey completed and wells demarcated.</p> <p>Water protection zones demarcated.</p> <p>Permits for water abstraction in place.</p> <p>Well drilling (water supply) method statement for approval by PIU.</p> <p>Groundwater use monitoring report.</p> <p>Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.</p>	
3.5	<p><b>Waste controls.</b></p> <p>Develop detailed construction Materials use and Waste Management Plan (to include hazardous wastes) as part of the Lot-specific Construction ESMMP, which includes the following:</p> <ul style="list-style-type: none"> <li>• Application of waste hierarchy in project planning to ensure efficient use and management of resources so that priority is to prevent from generation of waste at source as much as possible.</li> <li>• Minimum rate of recovery of at least 60%.</li> <li>• Pre-determine types and amount of waste (especially hazardous waste) to be generated as much as possible in order to enable planning of management actions effectively prior to construction</li> <li>• Procedures for proper handling of all waste generated and waste segregation/ designated</li> </ul>	<p>Management of environmental impacts on receptors.</p> <p>Compliance with regulatory requirements of Mongolia.</p>	<p>EBRD PR3.</p> <p>Compliance with regulatory requirements of Mongolia.</p> <p>Good international practice.</p>	<p>Contractor.</p> <p>PIU to preapprove waste disposal routes.</p>	<p>Develop prior to construction activities commencing.</p> <p>Implement during construction.</p>	<p>Detailed management plan approved by PIU.</p> <p>Plans provided to Bank for review and no-objection approval.</p> <p>Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.</p>	

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	<p>storage locations</p> <ul style="list-style-type: none"> <li>Secondary containment measures for hazardous materials and stored in construction compounds. Use fluid catchment trays in vehicle refuelling areas</li> <li>Review for potential contamination related to any realignment or removal of any petrol stations</li> <li>Identify licensed facilities for acceptance and disposal of construction waste and other waste streams including hazardous waste</li> <li>Obtain related permits and have agreements with relevant local authorities for waste management, including transportation and disposal of solid and liquid waste</li> <li>Methods to verify proper off-site management of related wastes by contractors</li> </ul>						
3.6	<p><b>Noise and Vibration Controls and Monitoring.</b></p> <p>Prepare and implement detailed Lot-specific Construction ESMMP with enhanced measures to control noise and vibration in accordance with the Supplementary ESIA/ESMMP/Project ESMMP.</p> <p>Conduct a noise survey to identify potential noise impacts in soums where the road will effectively be closer to residential properties in accordance with requirements set out in the Supplementary ESIA/ESMMP/Project ESMMP.</p>	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Contractor.	Prior to construction activities commencing. Implement prior to and during construction.	Detailed plan approved by PIU. Plans provided to Bank for review and no-objection approval. Pre-construction baseline established. Monitoring during construction. Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.	
3.7	<p><b>Soil Erosion and Pollution Controls.</b></p> <p>Prepare and implement detailed Lot-specific Construction ESMMP in accordance with the Supplementary ESIA/ESMMP/Project ESMMP. This should include planning of any cut and fill slopes, haul roads and temporary works areas/camps in a way to disturb minimal amount of area and therefore minimum topsoil stripping (ie: maximizing use previous dirt roads). It should also take into account any requirements for soil protection in relation to permafrost, where relevant</p>	Management of environmental impacts on receptors.	EBRD PR3. Good international practice.	Contractor.	Prior to construction activities commencing. Implement during construction.	Detailed management plan approved by PIU. Plans provided to Bank for review and no-objection approval. Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.	

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	along the road.						
<b>PR4</b>	<b>Health and Safety</b>						
4.1	<p><b>Occupational Health and Safety.</b></p> <p>Update the Supplementary ESMMP to provide a detailed OHS Plan to guide all activities on project site during site preparation and construction; and require contractor plan/compliance. Requirements to include (but not to be limited to):</p> <ul style="list-style-type: none"> <li>• Job and task specific hazard analysis and controls for all activities</li> <li>• Requirements for and enforcement of PPE use</li> <li>• Safety training for personnel</li> <li>• Develop and implement an emergency response procedure</li> <li>• Oversight of contractor OHS development / implementation, including mandatory reporting to PIU</li> <li>• Maintain statistics of total work hours, lost time, incidents, injuries, near misses etc.; and</li> <li>• Toolbox talks to share information on risks, accident prevention, etc.</li> <li>• Ensure no prohibited materials such as asbestos containing materials (e.g. pipes) are procured or used</li> </ul>	<p>To ensure management of workforce in line with EBRD requirements.</p> <p>To prevent OHS incidences.</p>	<p>EBRD PR2. EBRD PR4. Good international practice. EU OSH Framework.</p>	MRTD / PIU.	Develop prior to construction activities.	<p>Detailed OHS Plan for approval by PIU.</p> <p>Plans provided to Bank for review and no-objection approval.</p> <p>Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.</p>	
4.2	<p><b>Occupational Health and Safety.</b></p> <p>Develop an OHS Plan for the O&amp;M phase.</p>	<p>To ensure management of workforce in line with EBRD requirements.</p> <p>To prevent OHS incidences.</p>	<p>EBRD PR2 EBRD PR4. Good international practice. EU OSH Framework.</p>	MRTD / PIU.	Developed prior to and maintained during operation.	<p>Detailed O&amp;M OHS Plan for review and no-objection approval.</p>	
4.3	<p><b>Community Health and Safety.</b></p> <p>Develop and implement procedures to protect public health and safety within contractors' detailed Lot-specific Construction ESMMP. Procedures to include (but not to be limited to):</p>	<p>To minimise accidents and incidents with road users, local communities and livestock.</p>	<p>EBRD PR4. Good international practice.</p>	Contractor.	<p>Develop prior to construction activities commencing.</p> <p>Implement during</p>	<p>Detailed management plan/procedures approved by PIU.</p> <p>Plans/procedures provided to Bank for review and no-objection approval.</p> <p>Progress report from contractor during</p>	

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	<ul style="list-style-type: none"> <li>Public notice of construction operations in areas open to the public</li> <li>Notice to nearby residents and local authorities before major activities and traffic</li> <li>Public education/awareness raising sessions be held in high risk areas (i.e. construction near population centres, schools, etc.) and people (e.g. herders, for example, encourage herders not to leave small livestock unattended) to make potentially affected people aware of the risks and controls in place</li> <li>Toolbox talks with workers to ensure workers are aware of measures to avoid risk to local communities; Implementation of safe working practices during construction including provision of hazard notices/signs/barriers</li> <li>Employ adequate measures to prevent unauthorized access to the construction</li> </ul>				construction.	construction through monthly, quarterly and annual reporting to PIU.	
4.4	<p><b>Traffic and Road Safety.</b></p> <p>Develop traffic management plan as part of the ESMMP in accordance with the Supplementary ESIA/ESMMP/Project ESMMP. It should include as a minimum:</p> <ul style="list-style-type: none"> <li>Management of haul roads, access roads and haul traffic</li> <li>Provision of safe access and egress across works for local communities</li> <li>Publication of details on temporary livestock crossings</li> <li>Construction vehicles to keep to agreed access routes, minimise risk and disruption to project affected communities and other road users and adhere to speed limits</li> <li>Appropriate management of interaction of construction traffic with public road users, such as use of traffic marshals/flagmen</li> <li>Complex traffic control to be coordinated in liaison with the Road Police</li> </ul>	To minimise accidents and incidents with road users, local communities and livestock, and maintain local access.	EBRD PR4. Good international practice.	Contractor.	Develop prior to construction activities commencing. Implement during construction.	Detailed management plan/procedures approved by PIU. Plans/procedures provided to Bank for review and no-objection approval. Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.	

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4.5	<b>Traffic and Road Safety.</b> Include all accepted road safety recommendations from the EBRD road safety audit in the design – any deviations from these accepted recommendations must be agreed in advance with the Bank.	To minimise accidents and incidents with road users and local communities, livestock.	EBRD PR4, PR1. ISO 39001	Internal resource (MRTD).	In final design	Incorporation of recommended measures into final design.	
4.6	<b>Traffic and Road Safety.</b> Develop and implement a program of road safety audits to assess safety performance along the alignment and village access roads, and to identify any unsafe conditions. This should include a Road Safety Audit at Pre-Opening/Post Construction to confirm recommendations accepted during the design stage Road Safety Audit have been implemented. A further Road Safety Audit should be undertaken 12 months post opening and then periodically every 3 years to assess road traffic collisions along the road and identify any trends/blackspots that required remedial actions.	To minimise accidents and incidents with road users and local communities, livestock.	EBRD PR4, PR1. ISO 39001	Internal resource (MRTD).	Pre-opening/Post construction  After 12 months of opening  Every 3 years	Pre-opening/Post construction Road Safety Audit  Road Safety Audit.  Road Safety Audit.	
4.7	<b>Natural Hazards.</b> Information to be provided on drainage channels and design of bridges and stability of embankment slopes, in particular measures to prevent potential destabilisation during periods of heavy rain.	To ensure design address climate resilience and reduces risk to road users and local communities.	EBRD PR4, PR1.	Internal resource (MRTD) and their design consultant, MCPC.	In final design	Incorporation of appropriate measures into final design.	
4.8	<b>Exposure to Disease.</b> Develop and implement procedures to control exposure to disease in accordance with the Supplementary ESIA/ESMMP/Project ESMMP; to include as a minimum: <ul style="list-style-type: none"> <li>Disease control measures</li> <li>Construction workers' camps measures to meet IFC/EBRD requirement, especially hygiene standards</li> <li>Medical surveillance of all workers to detect the risk of any STDs to workers and the general public</li> </ul>	To minimise spread of diseases.	EBRD PR4. Good international practice.	Contractor.	Develop prior to construction activities commencing.  Implement during construction.	Detailed management plan/procedures approved by PIU. Plans/procedures provided to Bank for review and no-objection approval. Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.	

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	<ul style="list-style-type: none"> <li>Toolbox talks with workers</li> </ul>						
4.9	<p><b>Emergency Preparedness and Response.</b></p> <p>Prior to construction on site, the Emergency Preparedness and Response Plan should be developed in full as part of the Lot-specific Construction ESMMP, in accordance with the Supplementary ESIA/ESMMP/Project ESMMP. It should include as a minimum:</p> <ul style="list-style-type: none"> <li>Identification of potential emergencies and risk assessments</li> <li>Roles and responsibilities</li> <li>Development of procedures to respond to identified emergencies</li> <li>Equipment required e.g. first aid facilities, firefighting equipment, etc.</li> <li>Testing and inspection regimes for emergency equipment</li> <li>Muster points. evacuation routes</li> <li>Training requirements</li> <li>Communication protocols to workers, public and other affected parties</li> <li>Location of nearest medical facilities</li> <li>Update and review cycle</li> </ul> <p>This plan should be developed and implemented in liaison with local community members, authorities and emergency services, and cover the requirements of this PR. This should be in place prior to construction commences on site.</p>	Prepare for emergencies to minimise negative impacts.	EBRD PR4. Good international practice.	Contractor.	Develop prior to construction activities commencing. Implement during construction.	Detailed management plan/procedures approved by PIU. Plans/procedures provided to Bank for review and no-objection approval. Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.	
4.10.	<p>Ensure noise mitigation measures (e.g. noise barriers) are incorporated into the design in the locations where the noise levels will be above established limits as a result of the road widening and increased traffic – this applies to noise sensitive receptors (e.g. residential properties) that are not subject to current or future resettlement.</p> <p>Undertake post-construction noise monitoring in the residential areas at noise sensitive receptors and, in case of the noise level exceedances, provide additional noise mitigation measures (e.g.</p>	Avoid community noise impacts	EBRD PR4	Internal resource (MRTD).	Prior to construction  Post construction and based on the results of noise monitoring	Noise barriers are incorporated into the design.  Noise monitoring report. Corrective plan for noise mitigation.	

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	barriers).						
<b>PR5</b>	<b>Land Acquisition, Involuntary Resettlement and Economic Displacement</b>						
5.1	<p><b>Consultation and Grievance Mechanism.</b></p> <p>Implement the Project SEP and a formal grievance mechanism, and continued consultation with people affected by land acquisition and / or livelihood impacts (temporary or permanent). Grievance mechanism log to be maintained by PIU for land acquisition.</p>	Avoid misunderstandings and provide up-to-date information on land acquisition activities.	EBRD PR5.	MRTD / PIU.	Ongoing.	Project Land acquisition grievance mechanism and log.	
5.2	<p><b>Land Acquisition Documentation.</b></p> <p>Provide all information and evidence of agreements with affected parties. Provide information on socio-economic surveys. Provide map / list of properties within Project footprint.</p>	Ensure compliance with EBRD requirements.	EBRD PR5.	MRTD / PIU.	Prior to completion of the LARF –mid-June 2019. To be included as part of disclosure.	Land acquisition plans and agreements with affected parties.	
5.3	<p><b>Land Acquisition Implementation.</b></p> <p>Development and implementation of a land acquisition and resettlement plan (LARP), in accordance with the Supplementary Land Acquisition and Resettlement Framework (LARF). All compensation disbursed prior to start of works on site with affected asset.</p>	To develop the LARF. Ensure compliance with EBRD requirements.	EBRD PR5.	MRTD / PIU.	Prior to construction works that will affect asset identified.	Records of all land acquisition activities, compensation framework and disbursements within a LARP.	
5.4	<p><b>Land Acquisition Documentation and Implementation.</b></p> <p>Ensure all temporary land requirements (e.g. construction camps, borrow pits, haul roads, etc) that will result in temporary or permanent physical and/or economic displacement are secured in accordance with the LARF. Where appropriate and required, development and implementation of a land acquisition and resettlement plan (LARP) in accordance with the LARF. This should be undertaken in liaison with PIU. All compensation disbursed prior to start of works on site with affected asset.</p>	Ensure compliance with EBRD requirements.	EBRD PR5	Contractor.	Prior to construction works that will affect asset identified.	LARP. Disbursement of compensation. Number of grievances.	



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5.5	<b>Monitoring.</b> Monitoring of the land acquisition and compensation activities to ensure compliance with EBRD PR5/LARF. Any gaps will be identified and notified to the PIU to address.	Ensure compliance with EBRD requirements.	EBRD PR5.	MRTD / PIU.	After completion of land acquisition.	EBRD audit/ monitoring report.	
5.6	<b>Resettlement Action Plan (RAP) Documentation and Implementation.</b> In the event that any displacement of properties will occur within the 50 m right of way in the future as a result of or related to this Project, ensure development and implementation of a RAP in accordance with the LARF. All compensation disbursed prior to start of clearance of affected asset.	Ensure compliance with EBRD requirements.	EBRD PR5.	MRTD	Prior to Right of Way clearance works that will affect asset identified.	RAP. Disbursement of compensation. Number of grievances.	
5.7	<b>Monitoring.</b> Formal completion audit.	Ensure compliance with EBRD requirements.	EBRD PR5.	EBRD.	After completion of land acquisition.	Completion Audit.	
<b>PR6</b>	<b>Biodiversity and Living Natural Resources</b>						
6.1	<b>Conservation of Biodiversity.</b> Survey of wildlife movement and distribution, covering as a minimum, red deer connectivity areas by specialist. Additional measures to be included in these areas on basis of specialist recommendations; this will include measures such as speed limits and road signs.	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	MRTD.	Prior to construction activities commencing.	Survey completed and design measures incorporated.	
6.2	<b>Conservation of Biodiversity.</b> Avoid tree felling during the nesting and breeding period. Where this is not possible, it will be necessary for a pre-clearance walkover to be completed by a suitably qualified ecologist to check for the presence of active bird nests. Should any nests be identified, it is recommended that these are excluded from works until such time that the young birds have fledged the nest - detailed advice in this regard should be sought from the ecologist.	Biodiversity protection. Compliance with EBRD requirements and EU Birds Directive.	EBRD PR1, PR6. EU Birds Directive. International Best Practice.	Contractor.	Prior to removal of trees.	Pre-construction report.	

No.	Action	Environmental & Social Risks (Liability/ Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	upon completion of survey.						
6.3	<b>Conservation of Biodiversity.</b> Where required, ensure all locally protected areas have written permission for the project from the relevant local authorities before construction starts and that Project doesn't jeopardize protection objectives. This must include haul road and any temporary site permissions based on actual locations.	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	Contractor.	Prior to construction activities commencing.	Relevant permissions/permits.	
6.4	<b>Conservation of Biodiversity.</b> Survey for marmot holes prior to works. If active marmot holes i.e. holes with resident marmot, are found within the construction area of disturbance, professional conservation organisations must be contacted to capture the animals and translocate them to other suitable areas prior to the works starting.	Biodiversity protection. Compliance with EBRD requirements and local requirements.	EBRD PR1, PR6. Local requirements. International Best Practice.	Contractor.	Prior to construction activities commencing.	Survey complete and reported in monthly report.	
6.5	<b>Conservation of Biodiversity.</b> Ensure compensation planting is provided where trees are removed, on the basis of a 2:1 ratio of planting. To be included in contractor site restoration plan.	Biodiversity protection. Compliance with EBRD requirements.	EBRD PR1, PR6. International Best Practice.	Contractor.	Post-construction.	Rehabilitation report. Trees planted.	
<b>PR7</b>	<b>Indigenous People</b>						
7.1	Not applicable.						
<b>PR8</b>	<b>Cultural Heritage</b>						
8.1	<b>Assessment and Management of Impacts on Cultural Heritage.</b> Undertake detailed Archaeological, palaeontological and ethnic survey along the road and works areas by a qualified specialist in accordance with Mongolian law.	Preserve sites of cultural significance. Respecting traditions and customs. Compliance with Mongolian law.	EBRD PR1, PR8. Mongolian law. International Best Practice.	Internal resource (MRTD). External resource – cultural heritage specialists approved by relevant Ministry.	Prior to construction activities commencing and prior to appointment of contractor.	Pre-construction Archaeological, palaeontological and ethnic survey report.	

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8.2	<p><b>Assessment and Management of Impacts on Cultural Heritage.</b></p> <p>Prepare and implement Cultural heritage management and chance finds procedure as part of detailed Lot-specific Construction ESMMP.</p> <p>Conduct training on chance finds procedure.</p>	<p>Preserve sites of cultural significance.</p> <p>Respecting traditions and customs.</p>	<p>EBRD PR1, PR8.</p> <p>International Best Practice.</p>	<p>Contractor.</p>	<p>Prior to construction activities commencing.</p> <p>Implement during construction.</p>	<p>Cultural heritage and chance finds procedure in the Lot-specific Construction ESMMP.</p> <p>Plans provided to Bank for review and no-objection approval.</p> <p>Progress report from contractor during construction through monthly, quarterly and annual reporting to PIU.</p>	
<b>PR10</b>	<b>Information Disclosure and Stakeholder Engagement</b>						
10.1	<p><b>Construction SEP and Operational Grievance Mechanism.</b></p> <p>Building on the Supplementary/Project SEP, develop and implement detailed Lot-specific Construction SEPs for approval by PIU.</p> <p>Community liaison officer or equivalent to be appointed by contractors.</p> <p>Ensure early notice to villages and residents prior to major project activities that could affect them.</p> <p>Undertake public education/awareness raising sessions in high risk areas (i.e. construction near population centres, schools, etc.) and with high risk groups (e.g. herders, for example, encourage herders not to leave small livestock unattended).</p> <p>Grievance mechanism log and reporting.</p>	<p>Compliance with EBRD requirements.</p>	<p>EBRD PR1, PR10.</p>	<p>Contractor.</p>	<p>Develop prior to construction on site.</p> <p>Implement during construction.</p>	<p>Lot-specific Construction SEP for each contractor approved by PIU.</p> <p>Contractor community liaison office to be appointed.</p> <p>Grievance mechanism log and records.</p>	
10.2	<p><b>Construction SEP and Operational Grievance Mechanism.</b></p> <p>Manage overall implementation of the stakeholder engagement process, including development of the Supplementary SEP to provide an overarching Project SEP which covers the approach to construction SE e.g. managing interfaces related to delivery of stakeholder engagement between ADB/EBRD project and contractors in different Lots.</p> <p>Manage and review contractor stakeholder engagement performance.</p>	<p>Compliance with EBRD requirements.</p>	<p>EBRD PR1, PR10.</p>	<p>MRTD / PIU.</p>	<p>Implement during construction.</p>	<p>Overall strategy for Project stakeholder engagement.</p> <p>Management of common stakeholder engagement process across Lots.</p>	

