

**ENVIRONMENTAL AND SOCIAL ASSESSMENT FOR EBRD
GREENFIELD: CATEGORY “A” PROJECT
JORDAN: THE NORTH SUBSTATION AND OHTLs PROJECT**

**ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)
FOR
THE NORTH SUBSTATION AND OHTLs**

September 2024

FINAL

REV. 06



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KEY TERMS AND DEFINITIONS

The Project	<p>The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) is considering providing a sovereign-guaranteed loan to the National Electric Power Company (“NEPCO”), a company wholly owned by the Government of Jordan (GoJ), with a tenor of up to 18 years and a grace period of up to 3 years. The loan agreement between EBRD and NEPCO is anticipated to be signed by December 2024.</p> <p><u>The proceeds will be used for the construction of the new North Substation (400/132/33 kV) in the Rihab area located around 61 km North-East of Amman, Jordan – referred to as the North Substation by National Electric Power Company (NEPCO) (the “Project”).</u></p> <p><u>In parallel, EBRD is currently discussing with NEPCO potential financing of an overhead transmission line (OHTL) being developed by NEPCO with different new route connections with the following lengths: 31 km double line (two lines each 31 km), 3 km, and 9 km and replacement for an 11 km existing line. This will be financed under a separate tranche.</u></p>
European Bank for Reconstruction and Development (EBRD)	Is the Bank considering providing a sovereign-guaranteed loan to NEPCO to implement the Project
National Electric Power Company (NEPCO)	<ul style="list-style-type: none"> ▪ It is a 100% state-owned public shareholding company established in accordance with the General Electricity Law No. 10 (1996) on the 1st of September 1996 and is licensed by the Energy & Minerals Regulatory Commission (EMRC). ▪ “Borrower” of the loan provided by EBRD. ▪ The owner and operator of the Project. ▪ Providing a preliminary design of the substation and the OHTL. ▪ Selecting the Engineering, Procurement, and Construction Contractors for the substation and the OHTL through an open procurement process. ▪ Undertaking the site selection and land acquisition for the substation location including related compensation. ▪ Reviewing and approving the detailed design and the OHTL route prepared by the EPC Contractor and undertaking compensation procedures for the Right of Way (ROW) of the OHTL. ▪ Preparing and submitting reports to the Lender (EBRD) in relation to E&S compliance and implementation of the Environmental and Social Action Plan (ESAP) commitments integrated in the loan agreement. ▪ Installing the electrical components for the Substation. ▪ Undertaking operation and maintenance of the substation and the OHTL.
The Contractors	<ul style="list-style-type: none"> ▪ Providing the final design of the Substation and the OHTL. ▪ Supply of material. ▪ Undertaking the construction activities of the substation and the OHTL.
Project Implementation Unit (PIU) Consultant	<ul style="list-style-type: none"> ▪ Is the PIU Consultant assigned by EBRD through an open procurement process to provide organisational and technical assistance to NEPCO to ensure the successful planning and implementation of the Project in accordance with the Project Implementation Plan (PIP) and with all EBRD requirements stipulated in the Loan Agreement. This contract will be financed by EBRD.
E&S Implementation Consultant	<ul style="list-style-type: none"> ▪ Is the E&S Consultant assigned by EBRD to work with NEPCO over a 36-month period to implement the E&S requirements of the EBRD and the ESAP measures. This contract will be financed by EBRD.

1 ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP) FOR THE NORTH SUBSTATION AND ASSOCIATED FACILITIES

1.1 Overview

The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) is considering providing a sovereign-guaranteed loan to the National Electric Power Company (“NEPCO”, the “Company” or the “Borrower”), a company wholly owned by the Government of Jordan (GoJ), with a tenor of up to 18 years and a grace period of up to 3 years.

The proceeds will be used to build the new Northern Substation in the Rihab area located around 61 km North-East of Amman, Jordan – referred to as the Northern Substation by NEPCO (the “Project”). Location shown in the figure below.

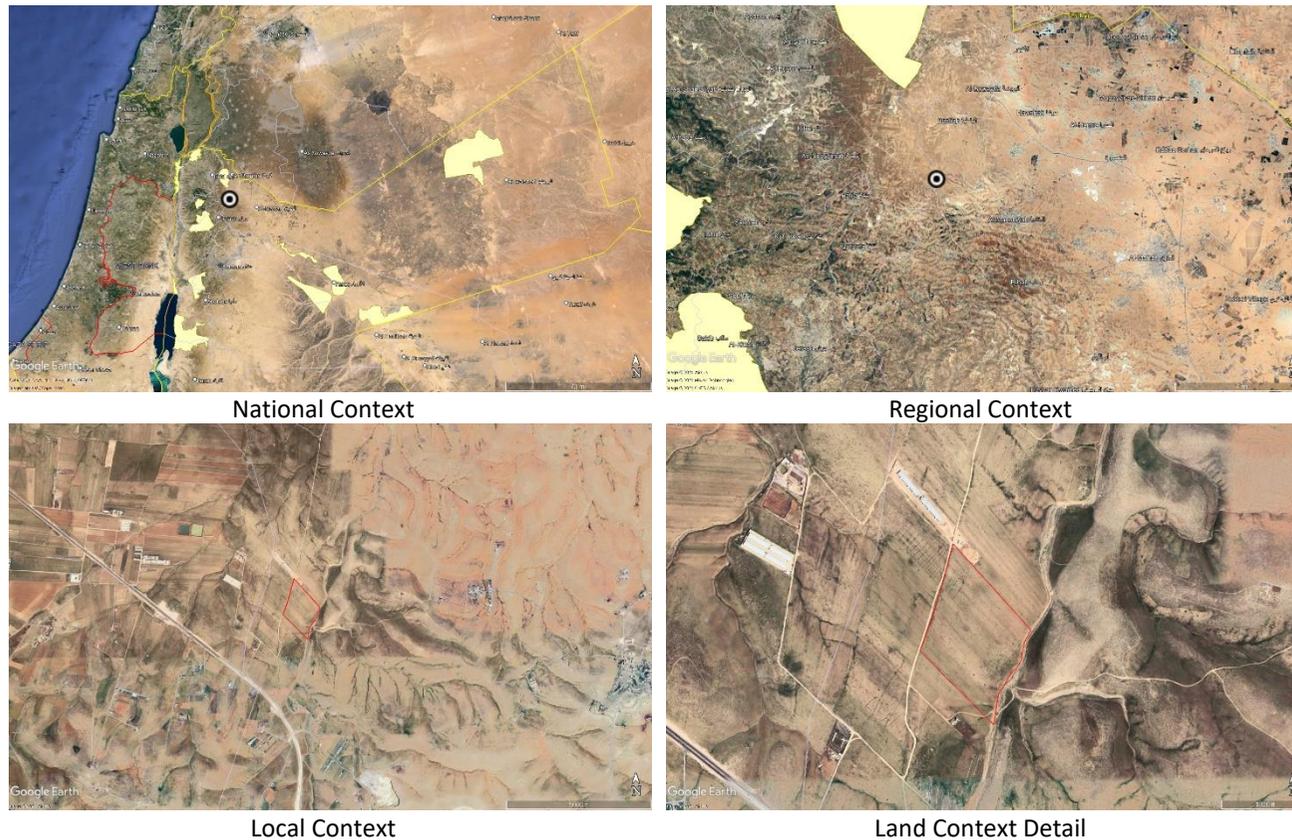


Figure 1: Project Location Contextual Overview from National to Local Scale

The main objective of the project is to construct a new 400/132/33 kV transmission substation in Rihab locality – Mafrqa Governorate.

In addition, the Project involves construction of an OHTL with a provisional concept route provided by NEPCO. Currently, there is a discussion between EBRD and NEPCO on financing the OHTL under a sperate tranche. Until this financing is committed, the OHTL in this ESAP is considered as an associated facility.

NEPCO provided a provisional route for the OHTL that starts from Al-Hashimeyeh area in Zarqa Governorate and passes through several districts and localities and ends at the selected location for the North Substation in Rihab locality.

According to NEPCO, there is also a possibility of adding a new 132/33 kV substation in the future on the same selected land plots to the North 400kv Substation to meet future loads in the region to reduce the loads of the Irbid, East Irbid, and Al-Hassan Industrial Estate substations.

Since the OHTL for the time being is considered as an associated facility, the EBRD’s Environmental and Social Policy (ESP) 2019 and its PRs require that the E&S appraisal of the project to include the assessment of the E&S risks and impacts of associated facilities as well as their management in accordance with the applicable laws, EBRD PRs, and Good International Industry Practice (GIIP).

The OHTL provisional route provided by NEPCO is shown in the figure below.

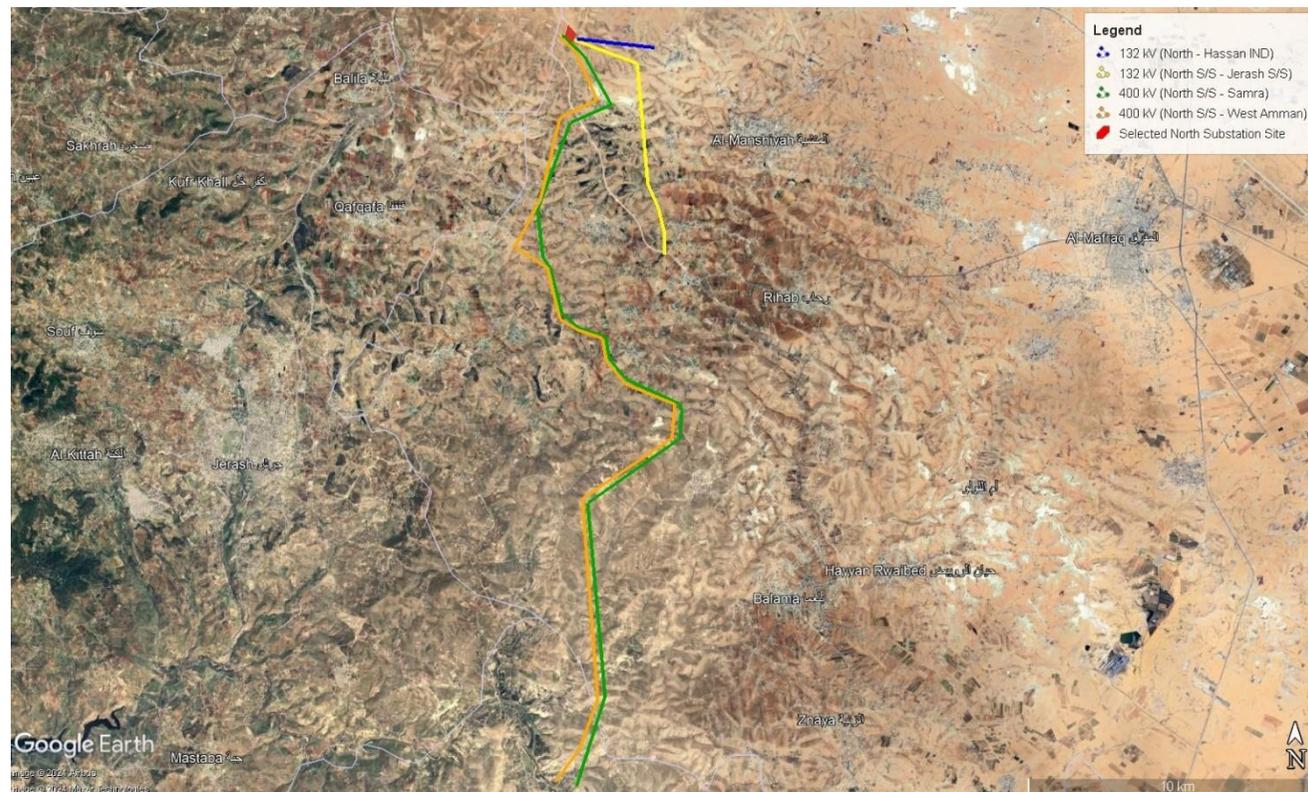


Figure 2: Provisional Route Provided by NEPCO for the OHTL (to be updated)

The OHTL connections are as follows:

- 400 kV OHTL (north s/s – Al Samra s/s) Length: 31 km
- 400 kV OHTL (north s/s -West Amman s/s) Length: 31 km
- 132 kV Super-Heated OHTL (North – Al Hassan Industrial Estate) Length: 11 km, as replacement of existing OHTL conductor + new 3 km OHTL to connect the said OHTL
- 132 kV conventional conductor OHTL (norths/s- Jerash s/s) Length: 9 km

1.2 The ESAP

An Environmental and Social Action Plan (ESAP) has been developed and adopted in 2018 for the NEPCO Restructuring Loan – Jordan financed by EBRD. The ESAP prepared for this project covers the new substation project and the associated facilities only and it does not replace or override the 2018 ESAP. NEPCO will be required to implement both ESAPs and report updates to EBRD.

This ESAP sets out the programme, identifies those responsible and defines success criteria, and as such provides a framework for monitoring the implementation of the Environmental and Social (E&S) measures to achieve compliance with the national legislations, EBRD Environmental and Social Policy (ESP) 2019 and associated Performance Requirements (PRs), and the related European Union (EU) Directives.

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1: Assessment and Management of Environmental and Social Impacts and Issues							
1.1	Assign an accredited Environmental Impact Assessment (EIA) ¹ consulting company to obtain the necessary permit for the Project and the Associated Facility (OHTL) from the Ministry of Environment (MoEnv). The EIA shall comply with the national legislations and EBRD ESP 2019. The ESIA shall also comply with the “General Guidelines for Bird Surveys and Assessment for Utilities and Infrastructure” dated October 2022 issued by the Royal Society for Conservation of Nature (RSCN) with regards to the requirements for bird surveys and the suitable methodology and for the required mitigation and management measures to be integrated in the designs.	Legal compliance	Legislative requirement EBRD PR 1 Best Practice	NEPCO & E&S ESAP Implementation Consultant	▪ Prior to first disbursement	<ul style="list-style-type: none"> ▪ Provide MoEnv official letter issuing the permit ▪ Evidence of consultation with RSCN and BirdLife ▪ Publish Non-Technical Summary of ESIA for the Project on web page and disclose locally in line with local requirements and the Stakeholder Engagement Plan (SEP). 	
1.2	Obtain all the required permits (environmental and construction) for the Project and the Associated Facilities (OHTL) including permit from Civil Aviation Regulatory Commission (CARC) for the towers	Legal compliance	Legislative requirement EBRD PR 1 Best Practice	NEPCO & E&S ESAP Implementation Consultant	▪ Prior to the construction mobilisation for Project	▪ Environmental and construction Authorisation granted.	
1.3	Submit an annual environmental and social ² report (AESR) to the EBRD on the environmental and social performance of the Project and the status of the implementation of this ESAP.	EBRD reporting requirement	EBRD PR 1	NEPCO & E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> ▪ During construction of Project: Environmental and social report and ESAP progress update to the EBRD every 6 months ▪ During operation: Annual environmental 	<ul style="list-style-type: none"> ▪ Annual environmental and social reports (template to be provided by the EBRD) and ESAP progress updates received. ▪ Reports and progress against this ESAP 	

¹ An Environmental Assessment study is referred to as EIA when it is undertaken in accordance with local requirements and as an ESIA when it is undertaken in accordance with International Financing Institution requirements.

² ‘Environmental and social’ includes occupational and community health, safety, security, gender and human rights as well as human resources matters and working conditions.

NEPCO Eastern Green Corridor - North Substation and Overhead Transmission Line - ESAP

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
					and social report and ESAP progress update to the EBRD within 60 days of Company year-end for the duration of EBRD financing of the Project.	satisfactory to the EBRD.	
1.4	NEPCO to prepare, adopt, and implement an Environmental, Health and Safety, and Social management system (EHSS-MS) for the construction and operation phases of the Project (substation) and the Associated Facilities (OHTL) to be aligned with the national legislations, EBRD's ESP (2019) (and the incorporated PRs), and relevant EU requirements and based on ISO system (9001:2015/ 14001:2015 and 45001:2018) requirements.	Appropriate management of E&S issues through a robust EHSS management system aligned with ISO system (9001:2015/ 14001:2015 and 45001:2018) requirements	EBRD PR1 Best practice.	NEPCO & E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> EHSS-MS updated and appropriately disseminated prior to the commencement of construction and operation activities of Project 	<ul style="list-style-type: none"> EHSS-MS in place and implemented by NEPCO for the Project and associated facilities. NEPCO to provide copy of EHSS-MS to EBRD for approval prior to construction and prior to operation 	
1.5	The Contractor shall submit a project and site-specific EHSS-MS in line with local legislations, EBRD ESP 2019 and according to ISO system (9001:2015/ 14001:2015 and 45001:2018) requirements. Contractors EHSS-MS will demonstrate how requirements are transferred to all subcontractors.	Appropriate management of E&S issues through a robust EHSS management system aligned with ISO system (9001:2015/ 14001:2015 and 45001:2018) requirements	EBRD PR1 Best practice.	Contractors	<ul style="list-style-type: none"> EHSS-MS finalised and approved by NEPCO and EBRD prior to the commencement of Contractors Scope for Project. 	<ul style="list-style-type: none"> EHSS-MS in place and implemented by Contractor for the Project and associated facilities. NEPCO to provide a copy of EHSS-MS for approval prior to construction 	
1.6	Prepare a legal register and implement all National legislative requirements in relation to the Project and associated facilities to ensure compliance with Jordanian law.	Ensure Project and associated facilities are in full compliance with relevant	EBRD PR1 Best practice.	NEPCO & E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> Prior to the commencement of construction activities of Project and maintained through 	<ul style="list-style-type: none"> Legal register in place and compliance monitored on a regular basis. 	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
		legislation			operations.		
1.7	Prepare and submit a Construction Environmental & Social Management and Monitoring Plan (CESMMP) to be implemented for the Project and the associated facilities. Ensure that the necessary measures contained in the ESIA are included.	Ensure management of EHSS risks/ compliance with national, international and lender standards.	EBRD PR 1 – ESMP Best Practice	Contractors	<ul style="list-style-type: none"> ▪ Prior to commencement of construction works of Project 	<ul style="list-style-type: none"> ▪ CESMMP in place and implemented. ▪ NEPCO to provide a copy of CESMMP to EBRD for approval prior to construction ▪ NEPCO, with support from the E&S ESAP implementation consultant, to monitor implementation of CESMMP by the Contractors and maintain proper documentation. 	
1.8	Prepare and submit an Operation Environmental Management Plan (OESMMP) to be implemented for the Project and the associated facilities. Ensure that the necessary measures contained in the ESIA are included.	Ensure management of EHSS risks/ compliance with national, international and lender standards.	EBRD PR 1 – ESMP Best Practice	NEPCO & E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> ▪ Prior to commencement of operation of Project 	<ul style="list-style-type: none"> ▪ OESMMP in place and implemented. ▪ NEPCO to provide a copy of OESMMP to EBRD for approval prior to operation ▪ NEPCO to monitor implementation of OESMMP, with support from the E&S ESAP implementation consultant, by their staff and maintain proper documentation. 	
1.9	Identify roles, responsibilities and authorities for implementation of the EHSS-MS for the Project and associated facilities, within the PIU of the project. Include an organisational chart which clearly presents the roles and responsibilities for the construction and	Ensure management of EHSS risks/ compliance with national,	EBRD PR 1 – Organisational Capacity and Commitment Best Practice	NEPCO & E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> ▪ Prior to construction of Project and AFs ▪ Prior to operation of Project 	<ul style="list-style-type: none"> ▪ Copy of organisational chart as part of EHSS-MS ▪ Provide copy of CVs and acquired certificates for the HSE Team 	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	operation and channels of communication and interaction with Contractors during construction and their staff during operation. In addition, assign a Health, Safety, and Environment (HSE) Onsite Officer for implementation of EHSS-MS	international and lender standards.					
1.10	Include the related measures contained in the ESIA/ESMMP and ESAP in tenders and contracts in relation to the Project and Associated Facilities and ensure safety and environmental factors are reflected in the designs and plans. ³	Ensure management of EHSS risks/ compliance with national, international and lender standards.	EBRD PR 1 – ESMP Best Practice	NEPCO, E&S ESAP Implementation Consultant, and PIU Consultant	▪ Prior to issuing tender to Contractors for Project	<ul style="list-style-type: none"> ▪ Copy of tender documents submitted to EBRD for approval highlighting clauses related to E&S compliance ▪ Proof of implementation of necessary measures and site assessment to finalise the alignment and design of the OHTL submitted to EBRD for approval demonstrating avoidance measures 	
1.11	Prepare and implement a stringent selection and evaluation process for the selection and management of contractor with particular	Ensure the proper selection of contractors and their compliance	PR 1	NEPCO, E&S ESAP Implementation Consultant, and PIU Consultant	▪ Prior to issuing tender to Contractors for Project	▪ Contractor selection and review process in place that considers EHSS and labour provisions and	

³ Safety and environmental considerations to be considered for the final OHTL alignment include but not limited to the following (as practically as possible): 1. Design for the OHTL alignment and the footprint of the towers shall avoid resettlement and livelihood impacts; 2. When undertaking works such as micro-siting of the pylon bases, the landowner/user/occupier should be consulted to get input on optimal siting from their point of view. The Contractor shall take all reasonable and feasible steps to avoid or, at least, minimise impacts of OHTL on the land; 3. Avoid tracing the transmission line through protected areas, environmentally sensitive areas or through forest areas; 4. Avoid archaeological and cultural heritage sites; 5. Place transmission line towers at high points in the terrain so that conductors can be chained over valleys, thus eliminating the need to remove trees; 6. Locate the transmission line along the base of mountain or hill slopes, rather than in the centre of valleys where large birds might collide with the conductors; 7. Avoid passing through villages and populated areas; 8. Minimise the need to build new access roads whenever possible and use existing roads and access roads whenever possible; 9. Ensure that minimum distances between cables and the ground, highways, roads, railway lines, buildings, communication systems, etc. are compliant with GIIP (Good International Industry Practice) and national legislations; 10. Ensure the appropriate design of the towers and associated components (cross arms, position of insulators...) and installation of conductors according to best international practices for protecting birds against collision and /or electrocution. A proper design may reduce 100% electrocution and minimise collision risk; 11. Noise Reduction Measures for OHTLs; 11. Additional measures such as those required from MoEnv and RSCN in relation to measures to prevent impacts on birds and avi-fauna.

NEPCO Eastern Green Corridor - North Substation and Overhead Transmission Line - ESAP

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	<p>focus on environmental, health and safety and labour provisions.</p> <p>Ensure that appropriate E&S clauses on compliance with E&S national legislation, NEPCO E&S standards and EBRD Performance Requirements are included in the tender documentation and contract.</p> <p>Request the contractor to cascade the E&S requirements to subcontractors.</p>	with EHSS and labour requirements				issues.	
1.12	<p>Develop and implement a suitable training plan/programme for NEPCO team responsible for the planning, development, construction, and operation of the Project and the associated facilities that includes EHSS issues. The plan/programme should focus on construction and operations of the Project and the associated facilities, key EHSS issues and risks, and the required measures to ensure compliance with national legislations and EBRD PRs.</p>	To ensure suitably qualified workers are working on the Project	PR1 Best practice	NEPCO, E&S ESAP Implementation Consultant, and PIU Consultant	<ul style="list-style-type: none"> ▪ Prior to the start of construction and operation of Project and continuing regularly throughout construction and operations. 	<ul style="list-style-type: none"> ▪ Project EHSS Training Programme in place and proof of implementation and delivery to key related teams in NEPCO 	
1.13	<p>Ensure that the necessary provisions, plans and procedures are in place to monitor the environmental, social and labour aspects of the Project and associated facilities. In specific, such procedures must consider the following:</p> <ul style="list-style-type: none"> ▪ Include reference for monitoring and reporting on project compliance with EBRD PR and updates on ESAP compliance. ▪ Undertake monthly EHSS audit during construction phase and annually during operation phase (audit contractor performance during construction and internal monitoring and auditing within 	Ensure management of EHSS risks/ compliance with national, international and lender standards.	EBRD PR 1 – Monitoring and Reporting Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	<ul style="list-style-type: none"> ▪ Prior to construction and prior to operation of Project ▪ Prior to construction of Project 	<ul style="list-style-type: none"> ▪ Provide Monitoring and Reporting procedures as part of EHSS-MS 	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	NEPCO during operation) <ul style="list-style-type: none"> Provide EBRD with EHSS report quarterly during construction and annually during operation to include compliance with EBRD PR and ESAP compliance 						
1.14	Assign an employee with the appropriate skills and qualifications to be responsible for community liaison, development of detailed land acquisition and compensation plans, the implementation of the SEP, and management of other social matters.	Inform and consult with local community, landowners, and land users regarding the project and the associated facilities	EBRD PR 5 and PR 10 – Consultation Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	<ul style="list-style-type: none"> Prior to construction of Project 	<ul style="list-style-type: none"> Appointment of appropriate personnel 	
PR2: Labour and Working Conditions							
2.1	As part of the EHSS-MS for the Project and the associated facilities, prepare a Human Resources policies and procedures, inclusive of equal opportunities and non-discrimination policies. This is to be done in accordance with Jordanian Labour Laws, EBRD PR 2 and International Labour Organisation (ILO) standards.	Effective management of workforce and ensure compliance with relevant Labour standards	EBRD PR 2 – HR Policies Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	<ul style="list-style-type: none"> Before and during construction of Project Before and during operation of Project 	<ul style="list-style-type: none"> Human Resources policy and procedures prepared for the Project and submitted to EBRD for approval. Provide evidence for implementation of induction training and regular refreshers for employees and workers. 	
2.2	Define worker accommodation requirements for construction workforce. Ensure contractors and all subcontractors implement the EBRD/IFC Worker accommodation Guidelines and undertake monthly audits to ensure compliance with these on NEPCO team and on contractor working for the Company. Accommodation on the construction site shall not be allowed.	To ensure adequate worker accommodation is provided and that contractors are required to comply with these standards.	PR2 Best practice EBRD/IFC Worker Accommodation Guidelines	NEPCO, E&S ESAP Implementation Consultant Contractor	<ul style="list-style-type: none"> Prior to construction of Project Quarterly inspection of housing and reporting 	<ul style="list-style-type: none"> Workforce accommodation plan prepared and submitted to EBRD for approval Audit reports every 6 months during the construction process NEPCO to monitor, with support from the E&S ESAP implementation 	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
						consultant, proper implementation	
2.3	<p>Setup and implement the practices that allow NEPCO employees and Contractor workers to have grievances addressed and monitor contractor grievance mechanism.</p> <p>The grievance mechanism should have a specific stream for GBVH. Focal points for GBVH shall be nominated among Contractor or Contractor supervision workforce.</p> <p>Ensure that all subcontractors have access to a grievance mechanism.</p>	Minimise risk of worker grievances and ensure issues are identified and managed	EBRD PR 2 – Grievance Mechanism Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractor	<ul style="list-style-type: none"> ▪ Before and during construction of Project ▪ Before and during operation of Project 	<ul style="list-style-type: none"> ▪ Worker grievance management procedure prepared and submitted to EBRD for approval ▪ Audit reports every 6 months during the construction process ▪ NEPCO, with support from the E&S ESAP implementation consultant, to monitor proper implementation and report worker grievances in the AESR. 	
2.4	Submit employment terms form to include a summary of employment terms for workers including employment duration, benefits, allowances, etc. Such forms should be explained to workers through appropriate means (e.g. as part of induction training) and should be signed by all employees retained.	Effective management of workforce and ensure compliance with relevant Labour standards	EBRD PR 2 – Non-employee Workers Best Practice	Contractors	<ul style="list-style-type: none"> ▪ Before and during construction of Project 	<ul style="list-style-type: none"> ▪ Employment terms form prepared and submitted to EBRD for approval ▪ Audit reports every 6 months during the construction process ▪ NEPCO, with support from E&S ESAP Implementation Consultant, to monitor proper implementation 	
2.5	Prepare a supply chain declaration form to be signed by all major equipment suppliers to the Project and the associated facilities. The form must state that the supplier complies with EBRD PR for supply chain and EHSS Policy prepared as part of the EHSS-MS.	Ensure supply chain working conditions are according to good practices	EBRD PR 2 – Supply Chain Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	<ul style="list-style-type: none"> ▪ Prior to construction of Project 	<ul style="list-style-type: none"> ▪ Provide signed supply chain declaration forms ▪ NEPCO to monitor proper implementation 	
2.6	Submit and implement labour employment plan. The plan should provide details on number of workers required for the project	Effective worker management and reduce risk of	EBRD PR 2 – Non-employee Workers Best Practice	Contractor	<ul style="list-style-type: none"> ▪ Prior to signing contract with construction 	<ul style="list-style-type: none"> ▪ Labour employment plan prepared and submitted to EBRD for 	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	with breakdown (skilled and unskilled), labour histogram, contract services required for the Project, and a local community labour /contractor recruitment strategy. Plan should be according to local employment requirements for local communities and should be implemented through appropriate local platforms (e.g. local District office / local Municipality).	local community resentment for project.			Contractor for Project	<ul style="list-style-type: none"> approval ▪ Audit reports every 6 months during the construction process ▪ NEPCO, with support from the E&S ESAP Implementation Consultant, to monitor proper implementation 	
2.7	Prepare Security staff employment plan to be guided by international best practice requirements (such as the Voluntary Principles on Security and Human Rights).	Ensure proper implementation of security measures to reduce risks on safety of public and workforce	EBRD PR 2 – Security Personnel Requirements Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractor	▪ Prior to construction of Project	<ul style="list-style-type: none"> ▪ Security employment plan prepared and submitted to EBRD for approval ▪ Audit reports every 6 months during the construction process ▪ NEPCO, with support from the E&S ESAP implementation consultant, to monitor proper implementation 	
2.8	Develop and implement a training programme for the Contractors and subcontractors on GBVH targeting workers and communities.	GBVH prevention	EBRD PR 2 Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractor	▪ Trainings developed before construction and implementing during construction	<ul style="list-style-type: none"> ▪ Contractor reports to NEPCO ▪ Evidence of training in the AESR 	
2.9	Prepare and implement a Worker Influx Plan and Labor Employment Plan that must take into account the following: <ul style="list-style-type: none"> i. Workers sleep offsite; no onsite accommodation provided. ii. Prioritize hiring Jordanian and local workers; use expatriates if local skills are lacking 	Labour and working conditions	EBRD PR 2 Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractor	▪ Prior to construction of Project	<ul style="list-style-type: none"> ▪ Worker Influx Plan prepared and submitted to EBRD for approval ▪ Labour and Employment Plan prepared and submitted to EBRD for approval 	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	iii. medical examination program; iv. details and procedures for ensuring and maintaining hygienic conditions onsite; v. development a code of conduct for workers; and vi. requirements for induction training, awareness-raising, and other applicable measures.						
PR3: Resource Efficiency and Pollution Prevention and Control							
3.1	Ensure the Contractors develop and implement a dust and pollution control procedure which identifies sources of dust and air pollution, mitigation measures to prevent nuisance dust and other air emissions, as required by ESIA/ESMMP	Minimise impact of nuisance and emissions on occupational health and safety and nearby receptors	National legislations, EBRD PR 3 Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	<ul style="list-style-type: none"> ▪ NEPCO, with support from the E&S ESAP implementation consultant, review/approval: prior to construction of Project ▪ Contractor to implement throughout construction 	<ul style="list-style-type: none"> ▪ Plan reviewed and approved by NEPCO, with support from the E&S ESAP implementation consultant, and implemented by the contractor for the Project ▪ Adherence to ESIA/ESMMP for dust and air emissions ▪ Submission of procedure as part of CESMMP ▪ No nuisance dust or other emissions ▪ Report to EBRD incidents involving nuisance dust ▪ NEPCO, with support from the E&S ESAP implementation consultant, to monitor proper implementation and submit audit reports 	

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						to EBRD ▪ Audit reports every 6 months during the construction process	
3.2	For SF6 in substation: ▪ Any new Circuit breaker and gauge for metering SF6 gas must have a SF6 leaks metering and prevention systems installed ▪ Ensure SF6 periodic leakage detection and recovery actions are taken through liaising with the substation operator ▪ Ensure that SF6 leaks metering and prevention system is functioning properly ▪ Implement a schedule for routine inspections and maintenance of SF6 equipment, which includes checking seals, gaskets, and connections for signs of wear or damage ▪ Employ leak detection equipment, such as gas analysers, to continuously monitor and detect any leaks in SF6 equipment ▪ Handling of hazardous material to be performed as mentioned within the accompanying I Safety Data Sheet (SDS) ▪ Ensure that all personnel working with SF6 equipment receive adequate training in handling, maintenance, and leak prevention. This training should also cover the risks associated with SF6 and the proper response procedures in the event of a leak ▪ Maintain detailed records of all maintenance, inspections, and leak detection activities. This documentation serves to track the history of SF6 equipment and past leak incidents. ▪ Develop clear procedures for reporting any SF6 leaks, encouraging employees to	Control and reduce emissions of GHG from project	EBRD PR 3 – Greenhouse Gases Best Practice	NEPCO, E&S ESAP Implementation Consultant, and PIU Consultant Contractors	▪ Prior to issue of contractor tender for substation ▪ Prior to signing with the Contractor (substation) ▪ Prior to commissioning ▪ Prior to and during operation	▪ Plan reviewed and approved by NEPCO, with support from the E&S ESAP implementation consultant, and implemented by the contractor and by NEPCO during operation ▪ SF6 leaks metering and prevention system installed and continue to function properly ▪ Audit reports every 6 months during the construction process ▪ NEPCO, with support from the E&S ESAP implementation consultant, to monitor proper implementation	

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	<p>promptly report even minor leaks without fear of repercussions</p> <ul style="list-style-type: none"> ▪ In the event of a leak detection, have a set of procedures in place to address it promptly. This may involve isolating the equipment, venting SF6 gas safely, and repairing or replacing faulty components ▪ Continuously review and improve SF6 leak management procedures based on industry best practices and lessons learned from past incidents ▪ Arrange for periodic third-party audits or inspections to ensure compliance with international industry best practices and gain an independent perspective on the SF6 leak management efforts ▪ Keep SF6 equipment within the recommended temperature and pressure ranges, as operating outside these parameters can increase the risk of leaks. ▪ Contractor to prepare and submit a SF6 leakage detection and management plan 						
3.3	<p>Ensure that Contractors develop and implement plan including measures to prevent impacts on water resources as required by ESIA/ESMMP</p>	<p>Prevent and minimise impact on water resources</p>	<p>National legislation EBRD PR 3 Best Practice</p>	<p>NEPCO, E&S ESAP Implementation Consultant Contractors</p>	<ul style="list-style-type: none"> ▪ NEPCO, with support from the E&S ESAP implementation consultant, review/approval: prior to construction of Projects ▪ Contractor to implement throughout construction of Project 	<ul style="list-style-type: none"> ▪ Plan reviewed and approved by NEPCO, with support from the E&S ESAP implementation consultant, and implemented by the contractor for the Project ▪ Adherence to ESIA/ESMMP for water protection ▪ Submission of procedure as part of 	

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						CESMMP <ul style="list-style-type: none"> ▪ Report to EBRD incidents involving water contamination ▪ NEPCO to monitor, with support from the E&S ESAP implementation consultant, proper implementation and submit audit reports to EBRD ▪ Audit reports every 6 months during the construction process 	
3.4	Ensure that Contractors develop and implement erosion control and site restoration plan for all construction activities as required by ESIA/ESMMP	Minimise impact on erosion	National legislations EBRD PR 3 Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	<ul style="list-style-type: none"> ▪ NEPCO, with support from the E&S ESAP implementation consultant, review/approval: prior to construction of Projects ▪ Contractor to implement throughout construction of Project 	<ul style="list-style-type: none"> ▪ Plan reviewed and approved by NEPCO, with support from the E&S ESAP implementation consultant, and implemented by the contractor for the Project ▪ Adherence to ESIA/ESMMP for erosion control ▪ Submission of procedure as part of CESMMP ▪ Implementation of best practice erosion control and site restoration ▪ Report to EBRD incidents ▪ NEPCO to monitor, with support from the E&S 	

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						ESAP implementation consultant, proper implementation by Contractors and submit audit reports to EBRD ▪ Audit reports every 6 months during the construction process. Report to EBRD: ▪	
3.5	Ensure that Contractors develop and implement a water management plan as required by ESIA/ESMMP.	Minimise water use by project	National legislations, EBRD PR 3 – Water Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	▪ NEPCO, with support from the E&S ESAP implementation consultant, review/approval: prior to construction ▪ Contractors to implement throughout construction of Project	▪ Plan reviewed and approved by NEPCO, with support from the E&S ESAP implementation consultant, and implemented by the contractor for the Project ▪ Adherence to ESIA/ESMMP ▪ Submission of procedure as part of CESMMP ▪ Continue implementation during construction and operation ▪ NEPCO to monitor, with support from the E&S ESAP implementation consultant, proper implementation by Contractors and submit audit reports to EBRD	

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3.6	Ensure that Contractors develop and implement waste management plan(s) for the substation and the OHTL to cover solid waste, wastewater and hazardous waste as required by ESIA/ESMMP.	Minimisation of waste streams and ensure proper management and disposal	National legislations, EBRD PR 3 – Waste Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	<ul style="list-style-type: none"> ▪ NEPCO, with support from the E&S ESAP implementation consultant, review/approval: prior to construction ▪ Contractors to implement throughout construction of Project 	<ul style="list-style-type: none"> ▪ Plan reviewed and approved by NEPCO, with support from the E&S ESAP implementation consultant, and implemented by the contractor for the Project ▪ Adherence to ESIA/ESMMP ▪ Submission of procedure as part of CESMMP ▪ Continue implementation during construction and operation ▪ NEPCO to monitor, with support from the E&S ESAP implementation consultant, proper implementation by Contractors and submit audit reports to EBRD 	
3.7	Prepare and submit spill prevention and response plan as required by ESIA/ESMMP.	Reduce risks of hazardous material spillage to surrounding environment	National legislations, EBRD PR 3 – Safe Use and Management of Hazardous Materials Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	<ul style="list-style-type: none"> ▪ NEPCO, with support from the E&S ESAP implementation consultant, review/approval: prior to construction ▪ Contractors to implement throughout construction of Project ▪ Prior to operation 	<ul style="list-style-type: none"> ▪ Plan reviewed and approved by NEPCO, with support from the E&S ESAP implementation consultant, and implemented by the contractor for the Project during construction and by NEPCO during operation 	

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						<ul style="list-style-type: none"> ▪ Adherence to ESIA/ESMMP ▪ Submission of procedure as part of CESMMP/OESMMP ▪ Continue implementation during construction and operation ▪ NEPCO to monitor, with support from the E&S ESAP implementation consultant, proper implementation by Contractors and by NEPCO Staff and submit audit reports to EBRD 	
3.8	Any new transformers at the substation should use PCB free oil	Eliminate use of persistent organic pollutants	EBRD PR 3 – Safe Use and Management of Hazardous Materials Best Practice	NEPCO, E&S ESAP Implementation Consultant, and PIU Consultant Contractors	<ul style="list-style-type: none"> ▪ Prior to issue of contractor tender for substation ▪ Prior to signing with the contractor (substation) ▪ Prior to operation 	<ul style="list-style-type: none"> ▪ Provide signed commitment letter 	
PR4: Health and Safety							
4.1	Ensure that construction (contractors) and operation (NEPCO) teams develop and implement Occupational Health and Safety (OHS) and public health and safety plans and programmes to guide all activities on project sites during site preparation and construction of the Project and Associated Facilities (by Contractors) and operation (by NEPCO).	Protect health and safety (Occupational and public health and safety)	National legislations, EBRD PR 4 / Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	<ul style="list-style-type: none"> ▪ Health and safety plans (Occupational health and safety and public health and safety) approved by NEPCO prior to mobilisation by contractors for the Project and prior to operation by NEPCO ▪ Plans implemented throughout 	<ul style="list-style-type: none"> ▪ Health and safety plans (Occupational health and safety and public health and safety) reviewed and approved by NEPCO, with support from the E&S ESAP implementation consultant, and implemented by the contractor for the 	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
					construction and operation	Project during construction and by NEPCO during operation <ul style="list-style-type: none"> ▪ NEPCO to review, with support from the E&S ESAP implementation consultant, and approve security procedures / practices ▪ Adherence to ESIA/ESMMP ▪ Submission of procedure as part of CESMMP/OESMMP ▪ Training confirmed by NEPCO ▪ NEPCO to monitor, with support from the E&S ESAP implementation consultant, proper implementation by Contractors during construction and by NEPCO Staff during operation and submit audit reports to EBRD 	
4.2	Ensure that contractors develop and implement a Traffic Management Plan to cover onsite and offsite activities as required by ESIA/ESMMP	Traffic and road safety risks to workers and communities	EBRD PR 4 – Traffic and Road Safety Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	<ul style="list-style-type: none"> ▪ Traffic plans approved by NEPCO prior to mobilisation by contractors for the Project ▪ Plans implemented throughout construction 	<ul style="list-style-type: none"> ▪ Plan reviewed and approved by NEPCO, with support from the E&S ESAP implementation consultant, and implemented by the contractor for the Project during construction 	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
						<ul style="list-style-type: none"> ▪ Adherence to ESIA/ESMMP ▪ Submission of procedure as part of CESMMP ▪ Continue implementation during construction ▪ NEPCO to monitor, with support from the E&S ESAP implementation consultant, proper implementation by Contractors during construction and submit audit reports to EBRD 	
4.3	Limit public exposure to electric and magnetic fields (EMF), including: <ul style="list-style-type: none"> ▪ As required by the International Financing Corporation (IFC) EHS Guideline, ensure that exposure level limits to the public should remain below the International Commission on Non-Ionising Radiation Protection (ICNIRP) limits ▪ NEPCO to ensure substation facilities, towers and corridor are beyond the ESIA-required buffer zones/clearances for houses/properties and in accordance with NEPCO regulations ▪ NEPCO to measure EMF at houses/buildings within 150m of substation and OHL and apply appropriate mitigation if needed to reduce potential exposure 	Limit public exposure to electric and magnetic fields	EBRD PR 4 Best Practice	NEPCO, E&S ESAP Implementation Consultant and PIU Consultant Contractors	<ul style="list-style-type: none"> ▪ Substation, tower and corridor location design stage ▪ EMF measurements: if requested by nearby resident ▪ EMF mitigation: if needed to meet international standards 	<ul style="list-style-type: none"> ▪ Public exposure to the EMF meets international standards ▪ EMF measured and mitigated if needed ▪ Report to EBRD results of any EMF measurements and any mitigation measures implemented 	

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4.4	Develop a project and site-specific Emergency Preparedness and Response Plan as required by ESIA/ESMMP	Ensure preparedness for emergency incidents and situations	EBRD PR 4 – Emergency Preparedness and Response Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	<ul style="list-style-type: none"> ▪ Emergency Preparedness and Response Plan approved by NEPCO prior to mobilisation by contractors for the Project and prior to operation by NEPCO ▪ Plans implemented throughout construction and operation 	<ul style="list-style-type: none"> ▪ Submission as part of CESMMP/OESMMP 	
4.6	Use good construction practice to prevent off-site nuisance from construction noise. NEPCO and/or Construction contractor to monitor noise upon request from resident and implement mitigation measures as needed to meet standards.	Protect public health and safety	National legislations, EBRD PR 4 / Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors and Subcontractor	<ul style="list-style-type: none"> ▪ Control noise: throughout construction ▪ Monitor and mitigate as needed 	<ul style="list-style-type: none"> ▪ No noise complaints ▪ NEPCO to monitor, with support from the E&S ESAP implementation consultant, proper implementation ▪ Report to EBRD if any noise measurements exceed standards, and any mitigation needed 	
4.7	NEPCO to implement measures to control operation noise: <ul style="list-style-type: none"> ▪ Engineering measures (e.g., rubber footings) to suppress operational noise at substations ▪ OHTL design to include Noise Reduction design measures ▪ On-demand monitoring in case of complaint or request by resident or other affected person ▪ Implementation of mitigation if noise exceeds standards 	Protect public health and safety	National legislations EBRD PR 4 Best Practice	NEPCO, E&S ESAP Implementation Consultant (if available during operation)	<ul style="list-style-type: none"> ▪ Control noise: throughout operation ▪ Measurements and mitigation during operation if requested and if needed 	<ul style="list-style-type: none"> ▪ Report to EBRD if any noise measurements exceed standards, and any mitigation needed 	
4.8	EPC Contractor to coordinate with NEPCO to provide the final detailed design to ensure they are aware of hydraulic designs required	Natural hazard - flood	EBRD PR 4 Best Practice	NEPCO EPC contractor	Prior final design is issued	Final design validated by NEPCO	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	to be implemented for the Project and the associated costs.						
4.9	Inspection for flood control and erosion and runoff control to include inspections for implementation of mitigation measures.	Natural hazard - flood	EBRD PR 4 Best Practice	NEPCO, E&S ESAP Implementation Consultant EPC Contractor	Continuous during construction and operation	Inspection reports from Contractor to NEPCO, then NEPCO monitoring, with support from the E&S ESAP implementation consultant. Evidence of monitoring in the AESR	
PR5: Land Acquisition, Involuntary Resettlement and Economic Displacement							
5.1	For the substation, since land acquisition has already been completed, land audit for substation land to be carried out and corrective action plan agreed with NEPCO before tendering for the Contractor and required measures implemented before contractor can mobilise to the site. ⁴	Ensure compliance with National Legislations and PR5	National legislations EBRD PR 5 Best Practice	NEPCO, E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> ▪ Corrective action plan agreed with NEPCO before tendering for the Contractor ▪ Required measures implemented before contractor can mobilise to the site. 	<ul style="list-style-type: none"> ▪ Audit report and corrective action plan approved. 	
5.2	For OHTL – a Resettlement Plan (RP) shall be prepared according to national legislation and PR5 requirements as stated in the Resettlement Framework (RF). ⁵	Ensure compliance with National Legislations and	National legislations EBRD PR 5 Best Practice	NEPCO, E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> ▪ During design, prior to land entry, prior to construction, after construction, after line 	<ul style="list-style-type: none"> ▪ Submit RP with all required documentation to EBRD for review and approval 	

- ⁴ Professional valuers will accompany the assets survey, determine and apply the relevant rate to each asset, and prepare the valuation report for each affected person for the consideration of the resettlement planning team manager. These reports will also be used in preparation of engagement materials for consultations with affected persons. The valuers will also be present during the implementation of the compensation distribution process.

⁵ RF for the OHTL shall include the following actions required to be completed – as practically as possible:

- NEPCO to provide all required information to prepare the RP and implement the below measures including – **prerequisite for preparation of the RP:**
 - Land deeds

- list of the landowners /users/occupiers of each impacted property will be needed as well as their contact details. In case, NEPCO was not able to get the required information from the DLS, then NEPCO shall duly document that.
- Cadastral information of each property impacted by the project
- The final design and land required for the substation
- The final designs of the OHTLs routes and location of each pylon and the footprint with dimensions, of the land for the base of each pylon
- Mapping of the temporary components for the construction phase including all cadastral information and property areas and descriptions
- Append a copy of PR 5 to the contract with the Contractors for the Project **along with tender package**
- Contractor, **prior to any construction works and as part of design of the works**, identify locations for temporary works such as laydown areas, access roads, work force and project site office accommodation. Where possible and feasible, avoid private land that is being actively used especially where this is for residential purposes and livelihoods purposes.
- NEPCO, **prior to any construction works and as part of design of the works**, when undertaking design works such as micro-siting of the pylon bases, the landowner/user/occupier should be consulted to get input on optimal siting from their point of view. The Contractor shall take all reasonable and feasible steps to avoid or, at least, minimise impacts of the project on the land and associated assets.
- Contractor where possible and feasible, use existing roads and tracks for accessing the sites of the project components. **Details to be submitted prior to construction.**
- Conduct proper alternatives assessment for the OHTL **in the design** to ensure resettlement/ livelihood impacts are avoided. This shall be covered **in the ESIA** to the extent possible and based on design information available and by the Contractor **during design** of the OHTL alignment and tower footprint
- Conduct proper census and inventory surveys **prior to construction**
- Conduct land valuation in line with market rates **prior to construction**
- Provide photographs of all land plots that are not vacant showing the use of the land and assets on the land. This shall be done **prior to construction and could be part of the design.**
- The Contractor to produce GIS maps of the project sites, including OHTL areas, showing the cadastral description and boundaries of the land plots. This should include areas of the land which will be impacted on both a temporary basis (such as laydown areas) and on a permanent basis (such as pylon bases). All boundaries should be dimensioned. The **mapping should be based on final designs.**
- Conduct engagements with landowners, land users or occupiers of land that may be impacted by the construction and operation phase of the project works. This should be to both inform as well as consult. This shall be **prior to and during construction.** In case, NEPCO was unable to reach the landowners, then NEPCO shall duly document that.
- Conduct consultation with landowners explaining the land valuation and land acquisition process for the OHTL and negotiations with landowners, including the timing (not necessarily date certain) of the compensation **prior to construction in case NEPCO was able to reach landowners.**
- If an agreement is reached with the landowner (**prior to construction**), NEPCO will be required to formalise the agreement and sign an undertaking to pay compensation once the transmission line is energised.
- NEPCO or its contractor should sign land entry protocol and proposing compensation in line with the compensation methodology agreed with the Bank **prior to land entry. (In case NEPCO or the Contractor was able to reach the landowners).**
- **Prior to land entry**, the Contractor shall follow the "Entry onto land protocol." A copy of this protocol should be attached to the **contract with the Contractor as an appendix.** If that was not completely possible, then NEPCO must duly document that.
- Prior notice to the landowner/ user/occupier should be given. They are entitled to be informed about what activities are proposed on their land. **In case, NEPCO was unable to reach the landowners, then NEPCO shall duly document that.**
- NEPCO to put in place the resource to do a detailed inventory immediately **upon installation of the line.** (This is to see if there is any difference compared to baseline)
- **Once the RF is prepared and agreed,** NEPCO will be required to provide a letter confirming that a land acquisition budget has been allocated to make the settlements once the line is energised with a clear timeline for payments

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		PR5, proper stakeholder and engagement, transparency, resettlement impact avoidance,		Contractors	energisation – as applicable. Timeline is underlined for each measure. This shall be finalised prior to final disbursement from EBRD <ul style="list-style-type: none"> E&S ESAP Implementation Consultant to support NEPCO to implement the requirements and monitor implementation by NEPCO and Contractors 	including associated evidence and documentation of implementation including eligibility matrices, list of PAPs, evidence of payment, etc. <ul style="list-style-type: none"> All land acquisition and compensation in accordance with Resettlement Plan Report to EBRD status of Resettlement Plan development and implementation, and summary of land acquisition and compensation 	
5.3	Appoint a person to be the primary point of contact within NEPCO regarding the land acquisition and compensation programme as part of the organisational plan in the EHSS-MS.	Ensure clear and transparent land acquisition process as per national related legislations with increased consultation and information disclosure	EBRD PR 5 – Compensation Best Practice	NEPCO, E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> Appointment: Prior to and throughout preparation and implementation of Resettlement Plan 	<ul style="list-style-type: none"> Person appointed and in place throughout preparation and implementation of Resettlement Plan Report to EBRD status of appointment and highlights of engagement with affected people 	
5.4	At completion of land acquisition and compensation, NEPCO to audit the completed programme.	Ensure clear and transparent land acquisition	EBRD PR 5 – Compensation Best Practice	NEPCO, E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> Undertake audit upon completion at appropriate time as 	<ul style="list-style-type: none"> Audit completed Final land acquisition and compensation in 	

- NEPCO shall pay compensation **after installation and energisation are complete**
- If a landowner chooses to contest the proposed compensation through legal means, NEPCO would be required to pay the compensation **once a court ruling is issued**
- Review of documents **ex post fact (retroactive)** submitted to the Bank, with lists of PAPs, evidence of payment, etc.

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		process as per national related legislations with increased consultation and information disclosure			per the Resettlement Plan	accordance with Resettlement Plan ▪ Report to EBRD status of Resettlement Plan implementation and summary report	
PR6: Biodiversity and Living Natural Resources							
6.1	The ESIA for the substation and the OHTL shall also comply with the “General Guidelines for Bird Surveys and Assessment for Utilities and Infrastructure” dated October 2022 issued by the Royal Society for Conservation of Nature (RSCN) with regards to the requirements for bird surveys (mainly for the OHTL but may also be required for the substation – based on consultation with RSCN).	Legal requirements Avoid and prevent impact of biodiversity	National requirements EBRD PR 6 – Conservation of Biodiversity Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractor(s)	<ul style="list-style-type: none"> ▪ During the ESIA process for the substation and the OHTL ▪ Prior to issue of the tender for the OHTL ▪ Prior to approval of the design for the substation and the OHTL ▪ Prior to construction of the substation and the OHTL and continue throughout construction ▪ During operation 	<ul style="list-style-type: none"> ▪ Provide MoEnv comments on the ESIA Terms of Reference for the substation and the OHTL and requirements for the avi-fauna surveys and assessment ▪ Provide MoEnv approval on the ESIA(s) and environmental permit(s) ▪ Provide correspondence with MoEnv and RSCN that the measures included in the design, tender documents, management plans and procedures, and other reports are sufficient and cover the requirements of the guidelines. 	
6.2	During detailed design stage, undertake field surveys at the Substation site and along the OHTL route, the surveys should include: <ul style="list-style-type: none"> ▪ Nest search survey during the suitable period. ▪ Bird monitoring survey which includes vantage points during periods of 	Legal requirements Avoid and prevent impact of biodiversity	National requirements EBRD PR 6 – Conservation of Biodiversity Best Practice	Contractor	<ul style="list-style-type: none"> ▪ During the detailed design of North Substation and OHTL 	<ul style="list-style-type: none"> ▪ All findings will feed into the biodiversity section of the ESIA. ▪ Findings will be used to minimise the impact on biodiversity in the project area. 	

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	<p>intensive migration for at least 2 weeks, in areas that attract birds within the project area such as (water bodies, landfills, important nesting sites for hovering birds)</p> <ul style="list-style-type: none"> ▪ Special surveys for rare or threatened species and birds on nesting periods. ▪ Survey of bird species that overwinter at the project site. <p>Surveys should be undertaken according to the “General Guidelines for Bird Surveys and Assessment for Utilities and Infrastructure” dated October 2022 issued by the RSCN.</p>						
6.3	<p>Worker code of conduct and induction training for NEPCO substation construction team and contractor OHTL construction team to cover biodiversity management measures, including no hunting at any time and under any condition.</p> <p>No construction camps allowed on site.</p>	Avoid potential for habitat disturbance	EBRD PR 6 – Conservation of Biodiversity Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractors	<ul style="list-style-type: none"> ▪ NEPCO review/ approval: prior to construction for Project ▪ Contractors to implement throughout construction 	<ul style="list-style-type: none"> ▪ Biodiversity management measures included in worker code of conduct / induction training 	
6.4	<p>Monitoring of the substation and the OHTL to inform the actual impact caused on resident and migratory birds.</p> <p>Mortality rate surveys must be undertaken through carcass search surveys covering the substation and the OHTL. The carcass search will work as a complementary survey for the above-mentioned monitoring.</p> <p>As part of the avi-fauna carcass search programme bats fatalities must be monitored.</p>	Risk of collision and strikes of migratory and soaring birds with the substation and OHTL. Risk of collision and strikes of bats with the substation and OHTL.	National requirements EBRD PR 6 – Conservation of Biodiversity Best Practice	NEPCO, E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> ▪ During first year of operation and to be revised accordingly 	<ul style="list-style-type: none"> ▪ Submission of avi-fauna report 	
6.5	According to findings of the preconstruction surveys and the avi-fauna surveys and after consultation with the RSCN/BirdLife, install	Risk of collision and strikes of migratory and	National requirements	NEPCO, E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> ▪ Design and install during construction 	<ul style="list-style-type: none"> ▪ Install diverters as recommended/agreed ▪ Report to EBRD status of 	

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	<p>bird diverters at suitable spacing where collision is a risk, and mainly on approximately 60% of the line between two pylons (from the centre out, as the pylons are fairly obvious and most collisions occur in the centre of the span between the pylons) to reduce risk of collision as per expert advice. Other measures may also be required for the substation and the OHTL based on request from MoEnv and RSCN and based on expert advice and RSCN requirements. These will also be included in the project details. The BFDs installed will be ones that glow or light up at night and are dynamic (e.g. move with the wind) to increase visibility for diurnal and nocturnal migrants. BFDs shall meet the required long-term guarantee (e.g. of ten years or more). Installation of earthing wire and attached BFDs will be completed at the same time (within 1 week). BFDs will be installed to the manufacturer’s guidance and assessment of the OHTL, taking into consideration number and spacing.</p> <p>Other measures may also be required for the substation and the OHTL based on request from MoEnv and RSCN and based on expert advice. These will also be included in the project details.</p>	<p>soaring birds with the substation and the OHTL. Risk of collision and strikes of bats with the OHTL.</p>	<p>EBRD PR 6 – Conservation of Biodiversity Best Practice</p>	<p>Contractors</p>		<p>bird diverter installation</p>	
6.6	<p>Select final locations of project components and alignment for associated facilities to avoid cutting trees to the extent possible. If needed, request prior authorisation from MoA and implement corresponding requirements.</p>	<p>Avoid potential for habitat disturbance</p>	<p>EBRD PR 6 – Conservation of Biodiversity Best Practice</p>	<p>NEPCO, E&S ESAP Implementation Consultant</p> <p>Contractors</p>	<p>▪ As part of the detailed design and the ESIA</p>	<p>▪ Include cutting trees activity in AESR and compliance with MoA recommendations</p>	

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6.7	<p>Develop a Biodiversity Management Plan in line with ESIA recommendations, this ESAP and national regulations.</p> <p>The Biodiversity Management Plan shall ensure that key biodiversity is managed as per PR6 requirement.</p> <p>Biodiversity Management plan to be signed off by NEPCO and the EBRD.</p>	Mitigate impact on biodiversity during construction and operation	EBRD PR 6 – Conservation of Biodiversity Best Practice	Contractors	Prior to construction, once detailed design is prepared	Biodiversity Management Plan developed and signed off by NEPCO and the EBRD	
PR8: Cultural Heritage							
8.1	Obtain no objection for the Department of Antiquities (DoA) on the final layout of the substation and the exact locations of the transmission towers as well as any access routes to ensure that no work will affect archaeological site.	Preserve archaeological finds during construction	National legislations EBRD PR 8 – Chance Finds Procedure Best Practice	NEPCO, E&S ESAP Implementation Consultant Contractor	▪ Prior to construction of Project	▪ No-objection letter from DOA	
8.2	<p>Undertake preconstruction survey with the Department of Antiquities (DOA) for the Project to avoid archaeological sites</p> <p>Develop and implement Chance Finds Procedure as part of CESMMP</p>	Preserve archaeological finds during construction	National legislations EBRD PR 8 – Chance Finds Procedure Best Practice	Contractor	▪ Prior to construction of Project	▪ Submission as part of CESMMP	
PR10: Information Disclosure and Stakeholder Engagement							
10.1	<p>Implement the Stakeholder Engagement Plan (SEP) developed for the Project. The SEP identifies appropriate engagement strategy for stakeholders relevant to the project including affected communities.</p> <p>NEPCO should identify responsible person for its implementation which could be under responsibilities of company CLO or HSE Manager/Officer.</p> <p>NEPCO shall require the EPC Contractors to identify and assign responsible person from</p>	Ensure meaningful engagement with stakeholders during project implementation	EBRD PR 10 – Stakeholder Engagement Plan Best Practice	NEPCO, E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> ▪ Ongoing SEP implementation ▪ Person assigned - prior to construction 	<ul style="list-style-type: none"> ▪ Implement SEP ▪ Responsible person assigned ▪ Report to EBRD on plan implementation and outcomes 	

NEPCO Eastern Green Corridor - North Substation and Overhead Transmission Line - ESAP

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Invest Needs, Response	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	their team or from the local community to be a CLO for the project and implementation of the SEP.						
10.2	Implement stakeholder grievance mechanism procedure as part of SEP. Grievance mechanism should identify responsible person for its implementation as part of the organisational plan in the EHSS-MS..	Minimise risk of grievances and ensure issues are identified and managed	EBRD PR 10 – Grievance Mechanism Best Practice	NEPCO, E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> ▪ Prior to construction 	<ul style="list-style-type: none"> ▪ Grievance mechanism procedure included as part of SEP ▪ NEPCO to monitor, with support from the E&S ESAP implementation consultant, proper implementation and report grievances in the AESR. 	
10.3	Provide public access to information on E&S performance of the project. This should include information on the NEPCO website and hardcopies through appropriate local platforms in Arabic language (local District Office/Municipality). Documents to include at least SEP, NTS and annual EHS update report	Ensure transparency and good communication with stakeholders	EBRD PR 10 – Information Disclosure Best Practice	NEPCO, E&S ESAP Implementation Consultant	<ul style="list-style-type: none"> ▪ Prior to construction ▪ Continuous during project lifetime 	<ul style="list-style-type: none"> ▪ Establish link on NEPCO website for public access 	