

## Environmental and Social Action Plan (ESAP) for Re-Powering of Ghorashal Unit No.3

September 2014

Task Title/Description	Due Date
<b>1. Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts</b>	
1.1. Assign an E&S officer at the Ghorashal Facility with ultimate responsible for the E&S	Within 3 months of execution date of the Contract of Guarantee
1.2. <b>Environment, Health and Safety</b> – Prepare a Project Specific EHS Plan.	Prior to construction
1.3. <b>Environment and Social Management System (ESMS)</b> – Develop an ESMS for the Ghorashal Plant that includes: <ul style="list-style-type: none"> <li>• E&amp;S Policy</li> <li>• Objectives of the system</li> <li>• Organizational Structure / Roles / Responsibilities for E&amp;S Management</li> <li>• E&amp;S Training requirements</li> <li>• E&amp;S Key Performance Indicators</li> <li>• Monitoring / Audit / Reporting Procedures</li> </ul>	Within 3 months of execution date of the Contract of Guarantee
1.4. <b>Environmental and Social Management and Monitoring for Ghorashal Plant</b> – Use the framework EMP in the EIA to prepare a detailed Environmental and Social Management and Monitoring Plan (ESMMP) for Operations.	Within 3 months of execution date of the Contract of Guarantee
1.5. <b>Emergency Preparedness and Response Plan</b> – Provide MIGA with project site-specific Emergency Response Plan for the operational phase	Prior to commissioning
1.6. <b>Community Engagement, Consultation, Disclosure.</b> Submit a stakeholder engagement plan that is tailored to the characteristics and interests of the Affected Communities, and includes differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable.	Within 3 months of execution date of the Contract of Guarantee
1.7. Develop a <b>Community Grievance Mechanism</b> for construction	Within 6 months of execution date of the Contract of Guarantee
1.8. Develop a <b>Community Grievance Mechanism</b> for operations	Within 6 months of execution date of the Contract of Guarantee
<b>2. Performance Standard 2: Labor and Working Conditions</b>	
2.1. Develop an HR Policy consistent with the requirements of PS 2 and Bangladesh Labor Law. This can be done by updating BPDB's Service Rules (preferred) or stand-alone policy for the Ghorashal Plant.	Within 3 months of execution date of the Contract of Guarantee
2.2. Develop an HR Policy for construction consistent with the requirements of PS 2 and Bangladesh Labor Law	Within 3 months of execution date of the Contract of Guarantee
2.3. In sub-contracting agreements, commit sub-contractors to compliance with the Construction HR Policy	Within 3 months of execution date of the Contract of Guarantee
2.4. Obtain a formal Labour Management and Accommodation Plan from the EPC contractor.	3 months prior to construction

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<p>2.5. Develop and OHS Management System for the Ghorashal Plant that includes:</p> <ul style="list-style-type: none"> <li>• OHS Policy;</li> <li>• Objectives of the system;</li> <li>• Organizational Structure / Roles / Responsibilities for OHS Management</li> <li>• Hazard identification and assessment;</li> <li>• Hazard control;</li> <li>• Formal workplace inspections;</li> <li>• OHS Training Requirements;</li> <li>• Accident / incident response and investigation</li> <li>• Monitoring / Audit / Reporting Procedures</li> </ul>	<p>Within 6 months of execution date of the Contract of Guarantee</p>
<p>2.6. BPDB will need to put in place a formal contractor management system to audit its contractors as well as those of the EPC contractor. The management system should include:</p> <ul style="list-style-type: none"> <li>• Compliance checklist against applicable standards;</li> <li>• Criterion on contractor selection to minimize HSE or labour related risks and issues at the time of engagement;</li> <li>• Monitoring and audit procedures; and</li> <li>• Requirement for third-party evaluation.</li> </ul>	<p>1 month prior to the start of construction activities</p>
<p><b>3. Performance Standard 3: Resource Efficiency and Pollution Prevention</b></p>	
<p>3.1. Develop a detailed water management and monitoring plan for the entire Ghorasal complex</p> <p><i>(this plan can be developed as part of the ESMMP – action 1.3. It should cover both groundwater and surface water and include a water balance for the plant and further elaboration of the baseline – see next action)</i></p>	<p>Within 3 months of execution date of the Contract of Guarantee</p>
<p>3.2. Establish a surface water quality baseline at intake and outflow</p> <p><i>(this requires at least weekly monitoring of field parameters (temperature, pH, turbidity, Dissolved Oxygen, Electrical Conductivity and Total Dissolved Solids) and at least monthly laboratory analysis of the full suite of parameters over a minimum of 6 month period that covers both dry season and rainy season at sites upstream and downstream of Ghorasal discharge point)</i></p>	<p>Within 6 months of the execution date of the Contract of Guarantee</p>
<p>3.3. Develop a detailed air quality monitoring program for the entire Ghorasal complex</p> <p><i>(This plan can be developed as part of the ESMMP – action 1.3. This plan should specify frequency, duration and locations for monitoring, the type of equipment to be used and should also include further elaboration of the baseline – see next action)</i></p>	<p>Within 3 months of execution date of the Contract of Guarantee</p>
<p>3.4. Establish an air quality baseline for the Ghorasal complex</p> <p><i>(this requires at least 7 days of continuous monitoring during the dry season and 7 days of continuous monitoring during the rainy season)</i></p>	<p>Within 9 months of the execution date of the Contract of Guarantee</p>
<p>3.5. Prepare a waste management plan</p> <p><i>(This plan can be developed as part of the ESMMP – action 1.3.)</i></p>	<p>Within 3 months of execution date of the Contract of Guarantee</p>

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<p>3.6. Prepare an Asbestos Abatement and Management Plan</p> <p><i>(This plan can be developed as part of the Construction EHS Plan – action 1.1 and asbestos should also be covered in the ESMMP – action 1.3)</i></p>	<p>Within 3 months of execution date of the Contract of Guarantee</p>
<p><b>4. Performance Standard 4: Community Health, Safety and Security</b></p>	
<p>4.1. Develop a traffic management plan for construction, including a driver code of conduct</p>	<p>Prior to construction</p>
<p>4.2. Engage a suitably qualified professional to undertake a Life and Fire Safety (L&amp;FS) review of the Ghorashal facility and develop a Corrective Action Plan to address any identified deficiencies / gaps between the existing facility and the requirements of the WBG General EHS Guidelines.</p>	<p>Within 6 months of the execution date of the Contract of Guarantee</p>
<p>4.3. Develop a Security Protocol for managing BPDB's own security, which outlines measures for assessing security risk, engaging and training security guards, security incident response and investigation, and monitoring performance. The Security Protocol should refer to international best practice, such as the UN Code of Conduct for Law Enforcement Officials and the UN Basic Principles on the use of force and firearms.</p>	<p>Within 3 months of the execution date of the Contract of Guarantee</p>